

Fulton Street Software

SOC 2 Frequently Asked Questions

What is SOC 2?

SOC 2 (System and Organization Controls 2) is an independent audit standard developed by the American Institute of Certified Public Accountants (AICPA). It evaluates whether an organization's controls are appropriately designed and implemented to protect customer data.

Fulton Street Software engaged an independent CPA firm to evaluate our security controls and governance processes against the SOC 2 Trust Services Criteria.

What is the difference between a Type I and Type II SOC 2 audit?

A SOC 2 audit may be performed as either a Type I or Type II examination.

SOC 2 Type I

A Type I audit evaluates whether an organization's security controls are properly designed and implemented as of a specific point in time.

The auditor reviews policies, procedures, technical safeguards, governance, risk management, access controls, change management, and other security processes to determine whether they are suitably designed to meet the Trust Services Criteria.

SOC 2 Type II

A Type II audit includes everything contained in a Type I examination but also evaluates whether those controls operated effectively over an extended observation period, typically six to twelve months.

The auditor gathers evidence throughout the review period to confirm that controls were consistently followed and operating as intended.

Why did Fulton Street Software complete a Type I audit first?

This is the standard progression followed by organizations implementing a formal SOC 2 compliance program.

An organization must first establish and implement its security controls before an auditor can evaluate whether those controls have operated consistently over time.

A Type I examination validates that the control framework has been properly designed and implemented. Once those controls have been operating for the required observation period, a Type II examination can be performed to evaluate their operating effectiveness.

Completing a Type I audit first is considered industry, best practice and is the normal path toward achieving a Type II report.

Does Fulton Street Software plan to complete a Type II audit?

Yes. Our Type I examination establishes the foundation for our ongoing compliance program. We intend to continue operating and monitoring our controls as part of our normal business processes and plan to undergo a Type II examination following the required observation period. Security and compliance are continuous processes rather than one-time projects.

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Which Trust Services Criteria were included?

Our SOC 2 examination was performed using the **Security (Common Criteria)** Trust Services Criteria.

These controls address areas such as:

- Information Security
- Logical Access Controls
- Risk Management
- Change Management
- System Monitoring
- Incident Response
- Vendor Management
- Business Continuity
- Governance

Where is customer data hosted?

The Asara platform is hosted within Microsoft Azure.

Microsoft Azure provides the underlying cloud infrastructure, while Fulton Street Software is responsible for designing, operating, monitoring, and securing the Asara application and supporting operational controls.

Is customer data encrypted?

Yes. Customer data is encrypted in transit using TLS and encrypted at rest within our cloud environment using Microsoft Azure encryption technologies.

Is Multi-Factor Authentication (MFA) supported?

Yes. Administrative access to Fulton Street Software systems requires Multi-Factor Authentication.

Customer organizations also authenticate their users through their own identity management processes, including Microsoft Active Directory and MFA where implemented.

Does Fulton Street Software perform vulnerability management?

Yes. Our security program includes vulnerability scanning, endpoint protection, security monitoring, log management, patch management, and periodic independent penetration testing as part of our ongoing security program.

Does Fulton Street Software sign Business Associate Agreements (BAAs)?

Yes. We execute Business Associate Agreements with customers when required and maintain appropriate agreements with applicable service providers.

How often are security controls reviewed?

Security controls are reviewed continuously through operational monitoring and are formally reviewed as part of our ongoing compliance program, including annual risk assessments, policy reviews, vendor evaluations, and independent audits.

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Who can I contact with security questions?

Questions regarding security, compliance, or our SOC 2 program may be directed to:
security@fultonstreetsoftware.com
or your Fulton Street Software account representative.