

Overhaul complies with 21 CFR Part 11 for electronic records. Overhaul has implemented technology and controls to ensure that system processing is complete, valid, accurate, and authorized to meet Overhaul's objectives. Overhaul ensures there are no errors in processing and in case of any, they should be detected timely and corrected.

Overhaul has implemented the following controls to meet compliance objectives:

- The Overhaul system detects invalid data in the electronic records, field entries that are outside of limits, mandatory fields that have been left blank, and invalid data values in electronic records.
- For electronic records, the Overhaul system provides the capability to view, print, and export the entire contents in human-readable form.
- Electronic records within the Overhaul system are immutable which protects electronic records from modification or deletion throughout the records retention period.
- Only authorized Overhaul staff have system-level access consistent with their job role.
- Overhaul performs a quarterly review of access to the Overhaul system. Any issues identified as a result of the review are communicated and resolved.
- Access to the Overhaul system requires individual login credentials made up of a unique combination of user id and password.
- Overhaul's service uses secure, computer-generated, time-stamped audit trails to record the date and time of actions that create, modify, or delete electronic records.
- Audit trail documentation is retained for a period of at least as long as that is required to be in compliance with the Customer's agreement.
- The Overhaul system protects the audit trail from unauthorized deletion, modification, and timestamp changes.
- Access to view, print, and export the audit trail is restricted to authorized users.
- System-level audit trails are implemented to record system administrator actions and changes.
- The Overhaul system supports role-based access controls to limit the options and functionality available to individual users, based on their access level and permission rights.
- The transmission of electronic records from/to the Overhaul system is encrypted over public networks via secure transmission protocols (e.g., HTTPS/TLS).
- Overhaul performs regular encrypted backups of encrypted databases and metadata storage which have restricted access.
- Restores of backups are performed regularly to ensure the integrity, accuracy, and ability to restore the data.
- The Overhaul service checks to determine the validity of the source of data input or operational instruction.
- Performance reviews for Overhaul staff are performed to help ensure that each employee's skill set matches their job responsibilities.
- Overhaul has formal written policies and procedures which collectively address the security, availability, and confidentiality of the Overhaul system and cover the escalation process for security breaches and other incidents. These policies are reviewed and approved by management on an annual basis and are posted on the Company's employee management platform.