



AUDIT DETAILS

Security

- SSL 128 bit encryption
- Microsoft Digital certificates installed on hard drive
- Biometric fingerprint authentication
- 15 minute forced log off
- Dual control of user maintenance by administrators

Multi-Factor Authentication

InfobankWEB currently complies with the FFIEC's guidelines regarding authentication in an internet banking environment. InfobankWEB meets these requirements by utilizing both biometric fingerprint scanners and digital certificate authentication.

OFAC

InfobankWEB scans the required fields on outgoing foreign wire transfers, outgoing domestic wire transfers, and incoming wire transfers at the moment they are created. If it is an outgoing transaction that contains a potential violation, the end user must agree to OFAC approval and provide a reason for processing. A report is available summarizing the number of scans and hits. All audit information regarding OFAC is retained for a period of (5) years.

New OFAC NS-PLS Watch List –

OFAC has created a list of persons who were elected to the Palestinian National Authority on the party slate of terrorist organizations, including Hamas. This list was released on April 12, 2006. The persons on this list *do not* appear on the OFAC SDN list. In order to uniquely identify these names, OFAC has created the program code [NS-PLC], which stands for "Non-SDN Palestinian Legislative Council". Unless OFAC has granted a license, transactions involving these individuals must be *rejected*. This newly mandated OFAC list is included in your automated OFAC scan performed by InfobankWEB.

Disaster Recovery

InfobankWEB is a web based system with the database residing at The Bankers Bank. The end user administrator would require only to order a new certificate and install the biometric device on a new PC with high speed internet for disaster recovery. All data and authentication credentials are stored at The Bankers Bank. There is no proprietary software to install, maintain and backup. However, InfobankWEB does provide a

database download utility for respondent bank backup of transactions and activity. The Bankers Bank recommends that this is performed at least quarterly.

External Review

InfobankWEB is subject to external audit reviews on a periodic basis. Annually, The Bankers Bank engages an outside party to perform an FFIEC Information Technology Audit. A review of InfobankWEB is included in this audit. Also, The Bankers Bank undergoes examinations from the Federal Reserve Bank and the Oklahoma State Banking Department every 18 months. The IT portions of these exams include a thorough review of InfobankWEB's processes and procedures.