

Platform layers and functionalities

1. Key functionalities of the solution are:

Cross-platform usability.

1.1 Estater:

- Real Time monitoring based on location preferences (map visualization tool based on homogeneous clusters of properties and projects)
- Supply of relevant information, including macroeconomic, industry related and other important political or social events
- Provide community related information and events. Tribe formation. Including podcast, interviews.

a. Retail investors

- Deliver core functionality to trade fractional rights
- Invest in small development Projects
- Lookup small properties for sale
- Deliver report capabilities as support for decision making
- Deliver portfolio management core functionality
- Deliver Push-notification for relevant events based on user preferences

b. Small developers

- Propose small projects
- Upload feature regarding various information
- Chat with individual investors

c. Small real estate agents / real estate owners

- Upload properties for projects or for sale
- Chat with retail investors

1.2 Apex Origin

- Create a flexible system for hosting cash rerouting
- Create customizable environment for various professional users (ex.)
- Provide an origination tool for creating a project, structuring a prospect and IFROs
- Deliver networking solution, chat feature and team management tool.

- Proved ahead of the market community related information, news and events. Appropriate for professional users

1.3 NAFRAM

- Provide fractional rights market overview
- Host individual primary and secondary fractional rights issues and disseminate investor information publicly, transparently offering equal opportunity for investors.
- Provide Cross-Sale functionality to Apex Origin for professional information and reports.
- Directly provide general public information relevant to the market (economical, political, geopolitical) NAFRAM 500 index, NAFRAM Sector Index.
- Host regulatory and supervisory functionality. Including the Market Regulatory & Supervisory Board (“MRSB”); Fractional Rights Clearing & Settlement House – FRCS and public decisions for regulations, supervision and sanctioning of market participants..

1.4 Slingshot

- Provide core functionality for professional trading. (Trading Desk)
- Order Management of secondary market cross-functional with NAFRAM. Opening, closing, and managing market positions
- Provide complex toolkits with live streaming quotes, charts and relevant information. Non copyrighted NAFRAM/Apex Origin information (general and market). Copyrighted information from Apex Origin.

DISCLAIMER

The content of this functional requirements document may be subject to change at the time of implementation in the event that the documented approaches to the development are found to be inappropriate or sub-optimal. As such the document should not be considered to be a final statement of the implemented code, nor form a definitive guide to the changes made.

2. PROJECT OBJECTIVES

Key project objectives are:

- Develop user experience with user friendly and intuitive User Interface with fast response times
- Build a solution that covers specific needs for all user types
- Create flexible system that can be dynamically adapted and updated on a fast pace process

- Deliver reporting capabilities as support for strategic decision-making process for operational team

3. SUCCESS FACTORS

Critical success factors for this development engagement are:

- High quality deliveries with maintainable quality software adhering to known design principles and Client's own best practices
- Adherence to industry security standards
- Sharing information on risks and impediments which may affect deliveries at an early stage
- Expected added value in test efficiency and test quality improvement
- A scalable and flexible resource pool allowing shorter time to market when developing new features
- Ensure low turnover in the team in order to keep the knowledge and competencies within the team over time.
- High quality estimates and a process to ensure commitment to the estimate and that any exceptional deviations from estimates are followed up
- Quick and easy adherence of individual investors
- High-level of customization for professional users
- High-level of community management

4. PRODUCT SCOPE

4.1 IN SCOPE

The product relies on the identification and answer of the key functionalities. The user can be any relevant stakeholder in real estate (from property owners to investors, traders and real estate professionals), with a product feature represented by a global real estate development and investment platform that can be used in order to satisfy the user's demands and expectations. It can be used for various actions, as well as in the process of selling and buying of fractional rights in real estate projects.

In order to materialize the solution, NAFRAM incorporates the following integrated apps:

- a. APEX ORIGIN – detailed in section 5.1
- b. NAFRAM (The North American Fractional Rights Automated Market) – detailed in section 5.2
- c. Slingshot – detailed in section 5.3
- d. Estater – detailed in section 5.4/5.1

5 HIGH-LEVEL FUNCTIONAL REQUIREMENTS

Note: These functional requirements are based on what is 'in scope' elements.

The MoSCoW technique has been integrated below to categorize and prioritize various requirements based on importance. MoSCoW categories are as follows:

- **MUST:** Describes a requirement that must be satisfied in the final solution for the solution to be considered a success;
- **SHOULD:** Represents a high-priority item that should be included in the solution if it is possible. This is often a critical requirement but one which can be satisfied in other ways if strictly necessary;
- **COULD:** Describes a requirement which is considered desirable but not necessary. This will be included if time and resources permit; and
- **WOULD:** Represents a requirement that stakeholders have agreed will not be implemented in a given release, but may be considered for the future

5.1 APEX ORIGIN / ESTATER

Apex Origin represents a desktop application which integrates:

- A commercial meeting place

All real estate professionals meet in a single virtual space, allowing them to cooperate, find common opportunities and develop Projects.

It allows many features, essentially bringing together all professionals that may contribute to a Project.

- A property listing area (the Opportunity Bank)

Homeowners and real estate agents can post properties available to be included in a Project.

The Opportunity Bank represents the space where professional developers and property managers (called Originators) can find and select opportunities and structure a Project, be it a full development on unoccupied land (for commercial or residential purposes), a refurbishment and resale, or simply a long-term lease of a property.

- An investment area, including an investment proposal structuring tool (an Origination Tool)

It allows the creation of Projects, covering all elements, from real estate development and management to financing (both equity and fixed income instruments).

The Origination Tool allows Originators to structure investment proposals in the form of a prospectus, for each Project. Such prospectuses are typically organized via advice from investment banks or investment advisors, certified by NAFRAM.

Once finalized, a prospectus becomes the basis for an initial fractional rights offering on NAFRAM OTC or an IPO (Initial Public Rights Offering) on NAFRAM ONE, which will be issued on NAFRAM (The North

American Fractional Rights Automated Market) and will be further formalized between the Originator, the Property Vehicle (as applicable) and the Original Investors in a Fractional Rights Agreement.

Apex Origin includes a library of pre-approved forms of prospectuses for investment and structured products, already certified by NAFRAM (and, as required, by the US-SEC). Disclosure requirements and standardized due diligence to be included differ in case of initial fractional rights offerings on NAFRAM OTC and IPROs on NAFRAM ONE, with the last to include higher standard requirements (as provided for in traditional capital markets for disclosure requirements in case of products dedicated to the OTC market or to NASDAQ/NYSE type of markets). Such standardized requirements will be included in a product library on APEX Origin.

Originators, with the advice of investment banks may propose other instruments, however subject to certification by the said entities (and, as required, by the US-SEC).

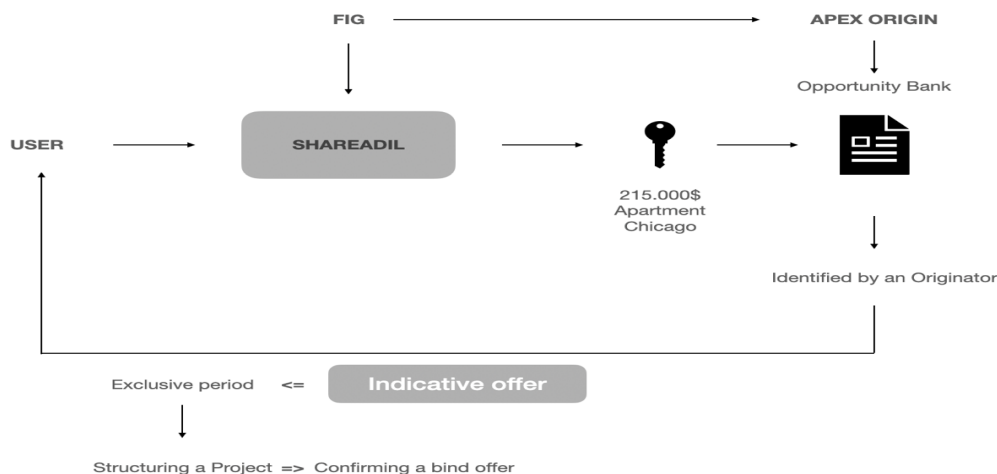
The Commercial Area includes dedicated space for all real estate professionals certified by NAFRAM:

Developers	Real estate agencies	Architects	Technical advisors
Contractors	Law Firms	Notaries Public	Valuators
Surveyors	Information Providers	KYC investigators	Planning Experts

The Commercial Area is designed to allow each participant to maximize their involvement in various Projects, through open interaction with other participants.

For example, an Originator looking to develop similar types of properties in 6-7 other parts of the US and Europe can access a screening tool that enables them to register a request for a particular Project profile, allowing each relevant supplier to pre-register.

The functionalities of Origination Tool in Apex Origin can be best understood by using a Project as an example.



A User of Estater, the retail app which is part of the NAFRAM ecosystem, posts a property for sale, for example, an apartment for \$ 215,000 in the urban residential area of Chicago – typically, this is a homeowner looking to find quickly a suitable offer (as opposed to the slow process of a traditional sale on the local market).

The listing automatically appears in the Opportunity Bank of Apex Origin. An Originator identifies the registration and contacts the homeowner on Estater (either directly or is notified by a certified agent), providing an indicative offer, subject to an exclusivity period for structuring a Project and therefore confirming a binding offer.

If the homeowner says yes to the non-binding offer, the property is blocked, and the exclusivity period starts.

The Originator is not interested of course in a single property deal. He plans to bring together 200+ properties in a single investment proposal, based on a unified, homogenous profile.

During the exclusivity period, the Originator uses Apex Origin as follows:

- leverages the resources in the Commercial Area to:
 - Perform due-diligence, including:
 - o Fact checking (property is actually located at address, identity of owner, KYC, fraud prevention etc);
 - o Property Title checking.
 - Structure the Project from a real estate perspective and incorporate the Property Vehicle;

using suppliers certified by FIG.

- Uses the Origination Tool to structure an IPRO (an Initial Fractional Rights Offering) for the Project, which includes all 200+ properties identified in a single, unified ticket. The Originator is usually advised in this respect by an investment bank and other primary financing providers which are selected as Original Investors from the Commercial Area.

Once a proforma prospectus is agreed with the Original Investors, the Originator provides a binding offer to the home owner (and all the other 200+ homeowners selected for the offering).

At this stage binding offers are signed, the Fractional Rights Agreement is signed with the Original Investors, the funds are released, and the property title to the relevant real estate is transferred to the Property Vehicle.

Once the primary offering is finalized, the issue, certified by NAFRAM (and by the SEC, as applicable) is listed for trading on the secondary market hosted by NAFRAM. The issue will immediately thereafter appear as tradeable on Estater.

IPROs

Each IPRO requires the issuance of a Prospectus and the conclusion of a Fractional Rights Agreement between the Originator, the Property Vehicle (as applicable) and the Original Investors. Issuance and execution of these documents is done in the platform, electronically.

Each IPRO prospectus will include:

- a Project – it can be a fix and lease, fix and flip, develop and lease, develop and sell, lease and re-release, for residential or commercial purposes, for single large properties or many smaller properties of homogenous features which are pooled together;
- the Originator – the entity or person who holds ultimate responsibility and manages the Project; the Originator can be a developer or a property manager, depending on the relevant skills specific to the Project;
- the Underwriter – the entity/entities that together coordinate and issue the IPRO documentation and coordinate the distribution and selling process of the IPRO, either under best effort basis or as an underwriter;
- an Investment horizon – 5- 20 years, depending on the Project, but may vary from 1 year to Projects held in perpetuity, in some cases;
- a Property Structure – which can vary from (1) strict direct ownership in the real estate itself by the investors – i.e. no corporation (suitable for a smaller number of investors), (2) pass through structures, such as trust entities, including public and private REITs, (3) fully segregated structures, where the property legal ownership is vested entirely with the Originator who retains the rights over it after the Project is finalized, while the investors hold contractual rights against the property vehicle, during the Investment Horizon and (4) dual listed Projects, which feature both a Project Vehicle listed on a classical exchange through an IPO, combined with an IPRO;
- various layers of Investors, from fixed income (debt) to preferred and common equity investors;

- specific Governance Rules, dealing with various events occurring regarding the Project or in relation to the investors, or between different classes of investors or regarding the Originator (and their liability).

The Apex Origin Library

Apex Origin include from the very beginning 6-9 individual types of offerings (IPRO products), which underline the versatility and competitive advantages of structuring IPROs.

Unique structures

The Products are structured in such a manner that they would have particular appeal for various categories of Originators and investors, covering a “gap” which can be now seen on the market.

Generally, each IPRO addresses either the Residential or the Commercial market, has a particular profile (fix & flip, fix& lease, develop & sell etc), is coordinated by an Originator working alongside an Investment Bank and is either focused on a single large value property or is based on pooling smaller properties (NAFRAM is particularly well equipped to handle large pools of properties).

Pooling Projects/IPROs

As an important remark, in pooling Projects, the Originator is not of course expected to manage individually each property, but will sub-contract to local developers/property managers. The Originator has the role of coordinating, integrating and ultimately represent the “face” towards the market, as a seasoned reputable player on the relevant niche.

A pooling IPRO allows a large Originator to coordinate the (1) development/purchase & repair and (2) resale/leasing of small properties and integrate them into a large scale operation (pool together many individual properties in a single project), thus making use of its operational leverage, as well as its reputation.

For small developers working under the Originator umbrella this is an excellent opportunity, as they would be able to raise financing for their small projects at much better rates than they would normally have available for them, as well as to lower costs of inputs (due to the integrating purchasing of materials etc).

For the market, the coordination of the Originator offers the guarantee of quality and standardized approach throughout the portfolio .

5.2 NAFRAM (THE NORTH AMERICAN FRACTIONAL RIGHTS AUTOMATED MARKET)

NAFRAM represents a desktop application which features an integrated primary and secondary single market for all Projects developed through Apex Origin or which are admitted to trading by NAFRAM,

subject to completion of requirements for listing (for example, crowdfunds which may be interested to list their existing projects in development or even finalized and income generating, on NAFRAM).

Effectively, NAFRAM represents the exchange market for all trading of fractional rights in Projects and is structured for large offerings, in excess of \$ 100 million (NAFRAM.ONE) as well as smaller investments, starting from \$ 1m. (NAFRAM.OTC).

5.3. SLINGSHOT

Slingshot is a desktop-based application made especially for professional traders and market makers, effectively a trading desk dedicated to Projects listed on NAFRAM, separately for NAFRAM OTC and NAFRAM ONE

Slingshot includes a mobile based monitoring function for professionals (a mobile based Slingshot Lite), based on a special login, allowing them access to monitor investments and the market on NAFRAM.

5.4. ESTATER

This is a mobile (and desktop) app, which allows individuals to:

- list properties as owners or as agents;
- look up properties as potential buyers or investors;
- make individual investments in fractional rights, i.e. buy and sell/trade fractional rights on the market (like an online broker app in terms of features); and
- structure with other individual investors smaller sized IPROs (which can be listed on NAFRAM.OTC).

Estater is focused on two important groups of stakeholders: (i) retail investors and traders which may develop a preference for this investment mode and include it in their portfolio, in addition to Robinhood or E-toro and (ii) small developers, usually individuals and families focused on small scale developments, and which are primary source for pooled offerings.

The ESTATER app consists of 3 major components:

1. The Listing module, where all properties are listed by Originator with their complete information (similar with area as in 5.1 Apex Origin but aimed towards the small Originators). In order to successfully list a property, certain legal steps must be successfully completed by the Originators (owner, small agent, etc):
 - a. The Originator has already signed pre-contracts (i.e. a small pool of 10 residential properties in Savannah, Georgia, already formed, named Pool Savannah) thus creating a pool

2. The Users Type Registration module, where users can create their accounts and allow them to choose one of the following 3 sign-up categories:
 - a. Property Owners – with the goal of listing their properties
 - b. Potential Investors – who should complete a KYC procedure according to any and all existing laws and regulations. Once successfully registered, Potential Investors profiles are also asked to complete a form where they will be asked to provide a number of parameters: first & last name, state, income range, etc. These parameters are necessary to allow the application to calculate the Investment Risk Appetite. The Potential investors can be differentiated between 2 relevant groupings:
 - i. Private individuals – represent the majority of the targeted user type as they also represent a marketing hook
 - ii. Investment Banks or similar – smaller in users’ volume but very relevant from a monetization point of view, can be attracted through a solid and qualified mass of Private Individual loyal users.
 - c. Small Originators/Professionals – can originate/list properties, create pools and interact exclusively online (i.e. an Originator with a bigger pool, can assimilate smaller Originators with smaller pools)
3. The Virtual Broker/Dealer module, which allows the users to trade on their own, offering users continuous information flows from NAFRAM (not from the trading module) using typical market standard visualization to allow for flawless usability.

The majority of the properties listed on the app are aimed to be fractioned or to enter in bigger pools (for higher margins). To facilitate this, users can opt of a variety of strategies to use, depending on the category they are in and their risk appetite. For example, if a group of smaller investors are interested in the same property, they can easily signal the interest for that property. Once the price and the number of fractional rights is set, a dedicated Group-User for the specific item is created (that allows the investors group to pull their resources easier). Through this dedicated Group-User, the investors can vote for the decision of acquiring the respective property and to also specify their terms (how much % of the total value shall be paid, etc) – in essence the application automizes deal syndication for its users and provides a highly secured virtual environment with user-friendly interface to expedite proceedings.

Once the conditions are accepted via vote in the specific property Group-User, the fractional rights are registered in the name of the seller and the system calculates automatically the rights distribution to the investors group according to % set during the group vote. All the investors in the group who successfully completed all the requirements to this stage, shall have 24 hours to complete payment. If in any circumstance, any of the investors fail decides on last-minute withdrawal and/or fails to complete the payment, the specified investor is banned and the said deal is canceled for the entire group (with the exception, the rest of the investors in the group are able and willing to take over the % of fractional rights and the financial obligation set by the banned investor, with sufficient pre-notice)

A property acquired by a group can always be re-listed for sale in the application, increasing its chances to be seen by bigger Originators. For listing/re-listing a group-owned property, group has vote and reach consensus (similar to how the acquisition decision voting works).

To ensure a smooth experience, the systems is build taking the following into account:

- User/Investors can make group acquisitions or listings either under a formalized structured (Real Estate Investment Trust) or under an un-formalized structure (Ad Hoc)
- If the user/investor group opts for the creation of a formalized structured group, an application process has to be followed (requiring and extended KYC and other documents to be submitted for review) and an Admin of ESTATER shall manually accept or deny the application.
- if the investor group becomes a Real Estate Investment Trust, no single investors that is part of a REIT can take a decision on the property as an individual
- If an Agent wishes to conduct transaction on ESTATER or in the NAFRAM ecosystems on behalf of his clients, the Agent in question must present a legalized mandate from the owner, that contains the extent of the Agents mandate as well as his limitations (if any)
- The platform shall provide the option for advisors to be engaged by ESTATER users online and offline(?) The advisers shall have a similar role to that of a broker or a dealer.

6 MARKET INSTITUTIONS

6.1. The Fractional Rights Registry

- Created with different layers for real estate property, FTIS and derivative products, including pooling of real estate property or FTIS, to register fractional property and fractional rights and as well, transactions of fractional property and fractional rights in real time, with very limited cost and in a traceable and transparent manner.
- FRR will have its own section on the platform, that market users may access from any of the platform layers (APEX Origin, Estater, NAFRAM, Slingshot) and require and get property statements for any right traded on the platform.
- Prior to any initial offering, either an offering on NAFRAM OTC or an IPRO on NAFRAM ONE, the title subject to that particular offering will be fractioned in as many fungible units as provided for in the initial offering and will be registered as such in the FRR. Likewise, at the end of each trading session, as soon as settlement is done by FRCS, all settlement results will be automatically transmitted from FRCS to FRR, with FRR automatically updating registration of rights owners according to settlement.

- Such registry will digitally record and keep records for all titles and stakeholders in the NAFRAM economy.
- The FRR will establish a cooperation with all relevant land registries, directed towards the registration of fractional rights for those properties, FTIS and derivative products issued and transacted within NAFRAM.
- For products that may be subject to a private offering followed by a delisting procedure on NAFRAM, the owner of such a delisted right may choose to terminate registration in the FRR and move its registration with the relevant land registry office. In such a case, NAFRAM will support the move through its cooperation agreements with land registries and by also offering access to a list of legal advisors registered with NAFRAM.
- Digital registry shall include a separate layer to archive all digital contracts and property titles and related documents for each specific digital record, thus creating a related digital history for each digital property and/or right registration.
- The creation of a special tax registry and tax collection digital tool allowing for collection and payment of fractional property related taxes, where due, according to title registration jurisdiction.
- All fractional property in the FRR shall be subject to full disclosure and compliance with laws and regulations issued by the appropriate authorities and will be fully compliant and reported with respect to money laundering, tax evasion, and anti-terrorist international regulations.

6.2. Fractional Rights Clearing & Settlement House - FRCS

- Acting as any traditional clearing and settlement institution for all secondary trading transactions, digitally linked to the Fractional Property Rights Registry.
- FRCS will have a dedicated section on the platform, performing all clearing and settlement operations of the daily trading. Settlement results will be available on FRCS page in the platform, to be accessed from NAFRAM and Slingshot.
- At the end of each transaction day, both on NAFRAM OTC and NAFRAM ONE, at settlement, FRCS will automatically send end-day registration of property over the transaction rights to FRR for instant registration.

6.3. **Market Regulatory & Supervisory Board (“MRSB”)** will be established as a Foundation with the purpose to:

- Issue all regulations and establish the regulatory framework with respect to both IPROs and secondary trading (i.e. disclosure requirements, IPROs structure, secondary trading regulations).
- License and approve NAFRAM market products. As a list of pre-approved products will be available from day one of operations, market participants and, in particular, investment banks acting on NAFRAM may create at any time new products, with such new products being subject however, of approval by the MRSB.
- License and approve direct participants on NAFRAM market: IPROs underwriters, broker-dealers, investment advisors.
- Exert the supervisory attribute in the market with respect to compliance with market regulations and with sanctioning and coercive attributes in the market.

The MRSB will be headed by a board of seven members nominated amongst reputable professionals (ex-investment banking officials, ex-regulatory agencies professionals, academics) to insure full neutrality of the MRSB towards NAFRAM market participants, products and operations. As well, the organizational chart of MRSB will include separate departments for regulatory and supervision, with each department divided in divisions according to functionality.

MRSB will have its own website with a link on NAFRAM, where interested parties may be able to always see: (i) all regulations issued by MRSB; (ii) licenses issued in favor of market participants; (iii) list of authorized IPROs; (iv) all decisions and approvals granted by MRSB; (v) enforcements; (vi) MRSB Board Members, organizational chart, departments and divisions.

6.4. **NAFRAM Collect.** As each right initially offered, traded and registered with the FRR generates income from a variety of sources, it will be imperative for NAFRAM, as part of its commitment to protect investors in the market, to make sure, not only such income is collected but that it is properly reported and gets distributed to the owners of the fractional rights attached to products registered in the FRR. With each right having its own existing collection agreements (i.e. lease agreements), it is not going to be the purpose and meaning of NAFRAM to replace those existing contracts. NAFRAM Collect will be just an organization inside NAFRAM, where, at the time of each and any initial offering of rights, the originator of that particular initial offering

will need to commit to report all collected income to NAFRAM Collect and distribute such collected income to NAFRAM Collect which will further distribute such income to the owners of rights as registered with the FRR.

NAFRAM Collect will interconnect with all relevant land registries and other private or public registry organisms. As instructed at the time of each initial offering or IPRO, Originators will need to send collection reports and transfer collected funds to NAFRAM Collect.

All collected funds registered by product in NAFRAM Collect will be distributed in the accounts of each investor owner of rights of a product, according to rights ownership lists delivered to NAFRAM Collect by the FRR.

NAFRAM Collect, as a section, will be part of the platform admin, as a service provided to the users and will not have a front-end page on the platform.

7 HIGH LEVEL NON-FUNCTIONAL REQUIREMENTS

SECURITY REQUIREMENTS

- Application should identify and authenticate all users accessing the system for traceability and accountability.
- The supplier/partner must operate a Vulnerability and Threat Management Program and proactively ensure new threats and vulnerabilities are identified and any risk to service removed.
- Beneficiary must be informed at all times of any medium or higher risks identified by these security tests and mitigation steps required in order to take timely and appropriate actions.
- Beneficiary undertakes scans of the relevant systems to identify vulnerabilities. Suppliers are expected to support this activity and provide requested information.
- All major development work undertaken and code changes made on critical systems or systems processing Beneficiary sensitive* data must be security tested before release to ensure it is not susceptible (at a minimum) to OWASP Top 10 common exploits. Any of these OWASP Top 10 being present in the code may delay the go-live of the application. See this link for more info – http://owasptop10.googlecode.com/files/OWASP_Top-10_2013%20-%20Presentation.pptx
- For mobile apps, they must be tested (at a minimum) against the OWASP Top 10 Mobile exploits. See the below link for more info – https://www.owasp.org/index.php/Projects/OWASP_Mobile_Security_Project_-_Top_Ten_Mobile_Risks
- Passwords must NOT be stored in cookies or temporary files. SSL cookies must have the secure flag set.

- All content should be delivered with the autocomplete=off parameter set for all forms relating to passwords and sensitive* data.
- Applications that process NAFRAM data must have an audit log and log the following data and the supplier/partner must at a minimum maintain this data: User's IP address, Date of access, Time of access, Resource requested, User's browser version, the referring URL.
- Application logs must be kept by the supplier/partner for a minimum of two years and kept in a secure manner. Logs must be exported on a regular basis and stored on encrypted backup media.
- Logs must be archived to a system that is separate to the system that the logs relate to, and integrity maintained.
- Logs must not include payment card details, authentication details or personal information regarding the users.

Supplier/Partner security requirements

- The supplier/partner must ensure that all backups containing NAFRAM sensitive* data or intellectual property are encrypted at all times. The supplier/partner must never directly expose their servers to the Internet – all servers must be protected by a separate firewall. All ports should be inaccessible from the Internet except for those specifically required for application operation – i.e. HTTP and HTTPS web servers, FTPS/SFTP for file transfer.
- Disable unused services, ports and development kits/tools from all internet facing servers at the minimum.
- Admin interfaces MUST NOT be available to the entire Internet address range. All admin interfaces for the application must be limited to a range of addresses and changed from the default directory and file names must be renamed to names different to the default values so as to limit the opportunity for opportunistic attempts to gain administrative access.
- All databases irrespective of whether production, staging or development that process NAFRAM sensitive* data must be encrypted. All backups of these databases must also be encrypted.
- The supplier/partner must ensure that any application provided is hosted in a secure industry standard (ex: ISO27001 certified) data center with adequate controls in place to ensure the physical security of NAFRAM sensitive* data and to ensure that unauthorized access to NAFRAM data does not occur.
- Database servers must NOT be located in the same network segment as Web servers and must NEVER be Internet facing. There must be separation between Web Servers and Database servers using a 'Stateful' firewall.
- The supplier/partner must NOT use NAFRAM systems that process production or live data for testing or development purposes. Test data must be created specifically for these purposes. Testing must NOT take place on Production systems.

- The supplier/partner must ensure that all transfer of NAFRAM non-public data between Beneficiary, the supplier/partner and any other third parties must only be communicated over secure channels (for example: SFTP, OFTP2, SSHv2, HTTPS). Unencrypted Email Attachments, FTP are prohibited from use and Beneficiary must be informed of any instance found by the supplier/partner.
- All supplier/partner-owned laptops/desktops that process any of NAFRAM sensitive* data, documents or files must have their hard drives and removable media fully encrypted using industry standard encryption software.
- The supplier/partner must NOT store NAFRAM sensitive* data on any mobile device or application, storage or any portable media type unless that device is fully encrypted.