



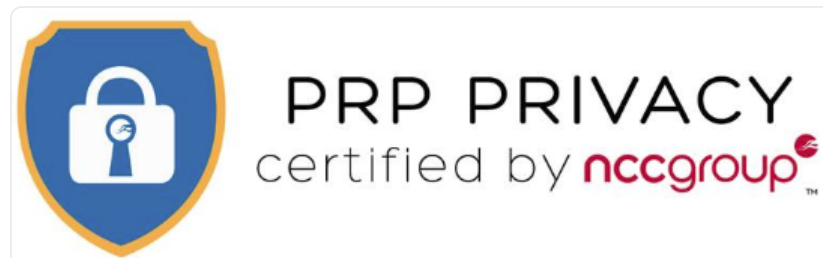
NCC Group Security Services, Inc.

650 California Street, Suite 2950

San Francisco, CA 94108

415.378.0100

<https://nccgroup.trust/us>



5 May 2025

## APEC PRP Certification

Via email

### Reference:

Thoropass, Inc.

575 Market Street, Suite 1850

San Francisco, CA, 94105

The following letter attests that Thoropass, Inc. has achieved the NCC Group's Asia Pacific Economic Cooperation (APEC) Privacy Recognition for Processors (PRP) System Certification as of the date above. This certification is active for one (1) year unless suspended or otherwise withdrawn by NCC Group prior to annual recertification.

The following systems/services were in scope of this assessment:

- Location(s) in Scope: All work will be performed remotely. Client scope is all cloud hosted.
- Applications/Systems in Scope: Thoropass Application system, including the Jarvis and Polaris applications.

NCC Group is an APEC-recognized Accountability Agent that performs CBPR and PRP certifications under the enforcement authority of the Federal Trade Commission (FTC). The APEC PRP system requires organizations to develop their own internal business rules on cross-border privacy procedures that must be assessed as compliant with the minimum requirements of the APEC system performed by an independent Accountability Agent.

Thoropass, Inc. has been found to be in compliance with the PRP certifications as required by APEC. The Thoropass, Inc. may utilize the NCC Group's PRP Certification Logo as provided for in the Communications Guidelines below. The Thoropass, Inc.

agrees to maintain its compliance with the PRP certification program and advise NCC Group of any material changes to its privacy policies or in its scoped environment.

Respectfully,

Randy Rodriguez

CBPR/PRP Assessor#: 2021-CBPRPRP-0014

[randy.rodriguez@nccgroup.com](mailto:randy.rodriguez@nccgroup.com)

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## **Communications Guidelines**

As required to become APEC CBPR or PRP Certified, an Applicant organization must obtain certification from an Accountability Agent. Once an Applicant organization is certified, the organization becomes a Participant in the CBPR or PRP Systems Program. The following are guidelines a Participant organization should follow once the organization is certified:

### **General Principles**

1. Communication of the certification and process should be abide by the general governance principles as the follows:
  - a. Communications should be simple and understandable;
  - b. Communications should be honest and transparent;
  - c. Communications should not be misleading about pricing, fees, or other costs associated with the certification process; and
  - d. Communications should be accountable to the Federal Trade Commission.
2. The NCC Group CBPR or PRP Certification logo is restricted for use by Certified Participant organizations.
3. Participant organizations are able to present their views of the certification process in webinars, press releases, white papers, articles, and Internet-based Media except to provide defamatory content that could harm the reputation of the certification process or NCC Group.