

# Information Security Policies – PMSOX LLC (Last updated: January 26, 2026)

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## 1. Information Security Policy (ISP)

This policy outlines the approach and controls in place to ensure the confidentiality, integrity, and availability of data handled by our application.

Owner / Founder: Omar El Mghari

Company: PMSOX LLC

### 1. Systems & Hosting

- Infrastructure is hosted on Vercel (frontend) and Firebase (auth, database).
- Monitored via GitHub-based CI pipelines.

### 2. Authentication

- Clerk handles user authentication with strong password policies.
- Internal tools (GitHub, Stripe, Plaid, etc.) use multi-factor authentication (MFA).

### 3. Access Control

- Only Omar has access to production systems.
- Secrets are stored via Vercel's secret manager and secured `env` files.
- Source code resides in private GitHub repositories.

### 4. Encryption

- HTTPS (TLS 1.2+) for all data in transit.
- Firebase and Vercel encrypt data at rest.

### 5. Change Management

- Version-controlled production code deployed through CI/CD (GitHub Actions).
- Security updates are applied within 24–48 hours.

### 6. Incident Response

- Errors and failures are logged; manual incident response playbook in place.

### 7. Privacy

- No Plaid bank data is stored. Users can delete data anytime.

## 2. Access Control Policy

This policy governs how access to systems and data is controlled and reviewed.

Owner: Omar El Mghari

### 1. Least Privilege Principle

- Only Omar has access to production systems, code, and secrets.

### 2. Authentication

- 2FA is enforced on all systems including GitHub, Firebase, Clerk, Vercel, Stripe, and Plaid.

### 3. Access Review

- Access logs are reviewed every 6 months on GitHub, Vercel, and Firebase.

### 4. Offboarding / Termination

- No current employees. If team members are added, access will be provisioned and revoked via GitHub and Vercel org controls.

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## 3. Data Deletion & Retention Policy

This policy outlines how PMSOX LLC handles the retention and deletion of user and system data.

### 1. Data Retention

- User activity logs and financial metadata (non-PII) are retained for audit purposes for up to 7 years.
- Plaid and Stripe transaction references are retained for 1 year unless otherwise required for compliance.

### 2. Data Deletion

- End-users may request account or transaction deletion at any time.
- All user requests are handled within 7 days, with full purging from Firebase and Stripe-linked metadata.

### 3. Data Scope

- We do not store bank credentials or transaction-level data pulled from Plaid.
- Minimal metadata (e.g., Plaid item ID, access token reference) is encrypted and deleted upon disconnection.

#### 4. Secure Deletion

- Firebase data is removed using the Admin SDK.
- All deletions are logged for audit and verified post-deletion.

### 4. Security Practices Summary

This summary outlines our key security practices to comply with data access partners such as Plaid.

#### 1. Authentication

- All accounts require 2FA (enabled via GitHub, Clerk, Firebase, and Stripe).

#### 2. Secure Storage & Secrets

- All secrets are stored in Vercel's encrypted secret manager and never committed to Git.

#### 3. Encryption

- Data in transit uses TLS 1.2+.
- Data at rest in Firebase and Stripe is encrypted by default.

#### 4. Least Privilege & Auditing

- Only the founder has admin access. GitHub, Firebase, and Stripe logs are reviewed monthly.

#### 5. Data Access & Deletion

- Users can revoke Plaid or Stripe access at any time.
- Data deletion is handled programmatically and logged.

#### 6. Infrastructure

- All infrastructure is hosted in the cloud (Firebase, Vercel), with managed patches and uptime monitoring.

#### 7. Incident Response

- Errors are logged and critical failures trigger alerts.
- Incident playbook is in place to address webhook or financial sync errors.

### 5. Zero Trust & Encryption Policy

This policy defines our approach to identity-first security using zero trust architecture and encryption.

## 1. Zero Trust Principles

- All access is denied by default unless explicitly granted.
- Authenticated sessions are validated continuously.

## 2. Identity Verification

- Users are authenticated using Clerk and Firebase JWT tokens.
- Internal services check claims and roles for every sensitive operation.

## 3. API Gateways

- API access is restricted via secure tokens and IP limitations when feasible.

## 4. Encryption

- HTTPS is enforced across all endpoints.
- Firebase encrypts all data at rest using AES-256.
- Secrets are injected at runtime from Vercel's environment store.

## 5. Device Trust (Future-proofing)

- Will evaluate secure device ID validation and user-agent checks as the team grows.