POS Remarketing Group, Inc.
1059 North Old Rand Road
Wauconda IL, 60084
Phone: 847.526.9650
Fax: 847.526.9651

March 2nd, 2026

Subject: Compliance Alignment of POSRG ITAD Services with HIPAA and NIST CSF 2.0

To Whom It May Concern,

This letter serves to formally document how POS Remarketing Group's (POSRG) IT Asset Disposition (ITAD) services align with and support compliance requirements under the **Health Insurance Portability and Accountability Act (HIPAA)** and the **NIST Cybersecurity Framework (NIST CSF 2.0)**.

POSRG maintains both **R2v3 (Responsible Recycling Version 3)** certification and **NAID AAA Certification**, demonstrating our adherence to stringent data security, environmental, and operational controls.

HIPAA Compliance Alignment

HIPAA's Security Rule requires covered entities and business associates to implement administrative, physical, and technical safeguards to protect electronic Protected Health Information (ePHI). POSRG's ITAD processes support these safeguards in the following ways:

1. Administrative Safeguards

- Documented data destruction policies and procedures
- Employee background screenings and confidentiality agreements
- Ongoing compliance training programs
- Serialized asset tracking and documented chain of custody
- Certificates of Data Destruction issued for all processed media

2. Physical Safeguards

- Controlled facility access with surveillance monitoring
- Secure storage of assets prior to processing
- Segregated processing areas for data-bearing devices
- Secure transportation protocols

3. Technical Safeguards

- NIST-compliant data sanitization methods consistent with NIST SP 800-88 guidelines
- Verified data destruction through overwriting, degaussing, or physical destruction

POS Remarketing Group, Inc.
1059 North Old Rand Road
Wauconda IL, 60084
Phone: 847.526.9650
Fax: 847.526.9651

- Audit trails for each serialized device
- Secure reporting and documentation retention

NAID AAA Certification further validates that our data destruction operations meet stringent third-party audited standards for secure media sanitization, which directly supports HIPAA's requirements for proper disposal of ePHI.

Alignment with NIST Cybersecurity Framework 2.0

POSRG's ITAD program supports the core functions outlined in NIST CSF 2.0:

1. Govern

- Documented policies aligned with data security and environmental compliance standards
- Management oversight and risk-based operational controls
- Regular third-party audits under R2v3 and NAID AAA standards

2. Identify

- Serialized asset inventory reconciliation
- Downstream vendor due diligence (R2v3 requirement)
- Risk-based device categorization and tracking

3. Protect

- Secure chain-of-custody procedures
- Access controls and secure processing facilities
- Controlled and verified sanitization methods

4. Detect

- Audit logging and reconciliation reporting
- Inventory verification processes
- Exception handling and discrepancy reporting protocols

5. Respond

- Incident response procedures

POS Remarketing Group, Inc.
1059 North Old Rand Road
Wauconda IL, 60084
Phone: 847.526.9650
Fax: 847.526.9651

- Documented corrective action processes
- Root cause analysis and remediation tracking

6. Recover

- Comprehensive reporting for compliance documentation
- Certificates of Destruction
- Audit-ready documentation retention

R2v3 certification specifically requires documented environmental, health, safety, quality, and data security management systems, as well as downstream accountability—providing an added layer of risk mitigation and compliance assurance.

Summary

Through its R2v3 and NAID AAA certifications, POSRG maintains independently audited controls that align with HIPAA Security Rule requirements and the NIST Cybersecurity Framework 2.0. Our ITAD services are designed to reduce risk, maintain chain of custody, ensure verified data destruction, and provide audit-ready documentation to support regulatory compliance obligations.

Sincerely,

Authorized Representative

POS Remarketing Group

VP of Asset Disposition

Matt Polich

Matt Polich

847-526-9650

mpolich@posrg.com