



Information Security Summary

How we protect your firm's information and your customers' data · October 2026

BlueSky AML performs independent AML testing for broker-dealers, which means handling your AML records and a sample of customer files. This summary describes how that information is protected. Our full due diligence questionnaire is available on request.

Written security program

We maintain a Written Information Security Program built to amended Regulation S-P service-provider expectations and Massachusetts 201 CMR 17.00. It is reviewed at least annually, and our principal is personally accountable for it.

Certified cloud platforms

Documents you upload stay in our portal, Content Snare (hosted on AWS in the United States, ISO 27001 certified), and are never copied elsewhere. Our workpapers are kept in Google Workspace (SOC 2 audited, ISO 27001 certified). All data is encrypted in transit and at rest.

Minimum data, short retention

We request only the sample and fields each test step needs and accept redacted copies. Customer NPI is deleted within 30 days of the final report; workpapers, with NPI removed, are kept for 6 years.

72-hour breach notice

If a breach involves your customer information, we notify you as soon as possible and no later than 72 hours after becoming aware of it, and support your own notification obligations.

One secure portal, never email

Clients upload documents only through our encrypted portal, using email-verified links that expire quickly. Every upload is marked confidential, so once submitted it can't be viewed through the link, even if an email is forwarded. Customer information is never exchanged by email.

Strict access control

Only our Principal can access client information. Multi-factor authentication is required on all of our accounts, and each client's documents are kept separate from every other client's.

Secured devices

Work is done on encrypted, automatically updated computers on a private network. We keep no paper files and never print client documents or copy them to removable media.

Vendor oversight and independence

Every provider that stores client data is reviewed before use and annually.

Questions or due diligence requests: Jack Walsh, Principal · jack@blueskyaml.com · blueskyaml.com