

LEGISYM

Credential Solutions™ Securely Proving Trading Partner Identities and Licensing

User Guide Series

Identity and DSCSA ATP Credential Onboarding

This User Guide outlines the required information and acceptable burdens of proof an applicant must provide in order to onboard with Legisym for Identity and DSCSA ATP Credentials.

INTRODUCTION

Before exchanging credentials as proof of identity and/or Authorized Trading Partner (ATP) status, new Clients need to establish an account with one of Legisym's digital wallet partners. By creating an account and submitting a credential request form to Legisym, applicants authorize Legisym to performance the necessary due diligence in order to issue and maintain their requested credentials (ie Identity Credential; DSCSA ATP Credential; etc.). The remainder of this document explains the onboarding process and acceptable burdens of proof associated with onboarding a new applicant:

- Account Creation and Authorization
- Credential Onboarding Process
 - Requesting Your Identity Credential
 - Issuance of Your Identity Credential
 - Requesting Your DSCSA ATP Credential
 - Issuance of your DSCSA ATP Credential

ACCOUNT CREATION AND AUTHORIZATION

In order to gain initial access to Legisym's Credentialing Services, you will need to accept Terms of Service of your digital wallet provider, sign contract, and pay upfront fees. Once your onboarding is completed with your digital wallet provider, the digital wallet provider who is integrated with Legisym, will allow you to pass through to Legisym's Credential Solutions™ application to begin the credential onboarding process in a secure interface.

CREDENTIAL ONBOARDING PROCESS

STEP 1: Requesting Your Identity Credential

Before an identity credential can be issued to your wallet, Legisym must first verify your identity through a process called identity proofing. Your Personal Information will only be used by Legisym to verify your identity in accordance with the guidelines published by the [National Institute for Standards and Technology \(NIST\)](#) or as required for the prevention of fraud.

In order to verify your identity, Legisym must collect your Personal Information, including certain Sensitive Personal Information. The specific categories of Personal Information or Sensitive Personal Information that may be collected through your use of Legisym's Credential Solutions™ services may vary, however some examples of Personal Information collected include name, address, and phone number. Some examples of Sensitive Personal Information that may be collected include different types of personal identification numbers, including driver's license, passport, or state ID card numbers. Legisym will never sell, rent, or trade any of this information. For more information about the information collected by Legisym, as well as additional details about how this information may be processed please see our [Privacy Policy](#).

Depending upon which method you select for "Verify My Identity Via", you will proceed with steps on the following page for either:

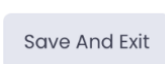


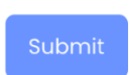
- A. Applying via DEA CSOS Signing Certificate; or**
- B. Apply via Notarized Corporate Documents.**

A. Applying via DEA CSOS Signing Certificate

Step A1: To authenticate the legitimacy of the organization as a registered business authorized to do business and to confirm your identity and the extent to which you demonstrate corporate responsibility consistent with the validated corporate registration, you will provide:

Required Text Fields	Additional Notes
Company Name	
Company Address	Address Line 1/ Line 2, City/District, State/Province/Region, Zip/Postal Code, Country
Contact Name	The name of the person submitting the application.
Contact Email	The business email of the person submitting the application.
Contact Phone	The business phone number of the person submitting the application.
Company Type	Select from dropdown menu: Manufacturer; Repackager, Wholesaler; 3PL; or Dispenser
Verify My Identity Via	Select from the dropdown menu: DEA Signing Certificate
Required Burdens of Proof	The Company Name and Company Address contained within your DEA-issued CSOS Signing Certificate must match the Company Name and Address entered in the online application. If the name or address does not match, or the certificate is expired or revoked, then the DEA-issued CSOS Signing Certificate cannot be used.
DEA Number	Provide the DEA number associated to your DEA-issued CSOS Signing Certificate. <i>NOTE: If entered incorrectly, upon submission of form you will see an error.</i>
DEA Signing Certificate (.pfx file)	Upload your .pfx associated the DEA number you entered. <i>NOTE: Upon submission of form, Legisym DOES NOT store your .pfx file. It is only used at the time of submission to complete due diligence checks associated to verifying your identity and authenticate the legitimacy of the organization as a registered business authorized to do business.</i>
DEA Signing Certificate Password	Enter your password associated to your DEA Signing Certificate. <i>NOTE: Upon submission of form, Legisym DOES NOT store your password. It is only used at the time of submission to complete due diligence checks associated to verifying your identity and authenticate the legitimacy of the organization as a registered business authorized to do business.</i>

Step A2: Once all data/burdens of proof are entered, the **SUBMIT** button will be enabled. *NOTE: The due diligence process WILL NOT begin until you click the **SUBMIT** button to submit your identity credential request to Legisym for processing.*

Form Buttons	Action Taken
	If you click SAVE AND EXIT , all completed form fields will be saved <i>EXCLUDING</i> DEA Signing Certificate .PFX file and DEA Signing Certificate Password. These two entries would need to be entered again upon returning and continue form. You will then be returned to your digital wallet provider’s portal.
	If you click CLEAR , all data field entries will be clear to start the form over.
	If you click CANCEL , any progress made will not be saved; you will be returned to your digital wallet provider’s portal.
	If you click SUBMIT: Legisym’s automated due diligence processes will be triggered and will provide a response in real time.

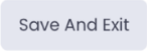
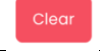

B. Applying via Notarized Company Documentation

Step B1: To authenticate the legitimacy of the organization as a registered business authorized to do business and to confirm your identity and the extent to which you demonstrate corporate responsibility consistent with the validated corporate registration, you will provide:

Required Text Fields	Additional Notes
Company Name	
Company Address	Address Line 1/ Line 2, City/District, State/Province/Region, Zip/Postal Code, Country
Contact Name	The name of the person submitting the application. The contact name entered on your application during onboarding must match the name shown on the Notarized Credential Request Letter AND government-issued photo ID uploaded.
Contact Email	The business email of the person submitting the application.
Contact Phone	The business phone number of the person submitting the application.
Company Type	Select from dropdown menu: Manufacturer; Repackager, Wholesaler; 3PL; or Dispenser
DUNS Number	The organization address entered on your online application during onboarding must match the name and address associated to the DUNS registration you provide here.
Required Document Uploads	The Organization Name and Organization Address printed on all documents must match the Name and Address entered in the online application. If the name or address is not printed on the document, then the document cannot be used.
Notarized Credential Request Letter (PDF)	<p>This a basic letter attesting that the documents being submitted for the identity proofing are true and accurate. It must be signed by whoever is completing this application on behalf of the organization. (see sample Notarized Credential Request Letter).</p> <p>To be considered valid, the document MUST:</p> <ul style="list-style-type: none"> • Contain applicant name that matches the name as entered in the online onboarding form; • Contain applicant name that matches the name as printed on the Government-issued Photo ID uploaded; • Contain organization name and address that matches the organization name and address entered in online onboarding form; • Be printed on company letterhead; • Contain visible signature of registered Notary Public; and • Contain visible stamp/seal of Notary Public. NOTE: If the notary seal/stamp IS NOT visible in scanned copy, the copy should be uploaded and the original mailed to: Legisym, LLC Attn: Brittany Payson 9325 Tarver Dr. STE C-101 Temple, TX 76502
Government-Issued Photo ID (PDF)	<p>Any (1) of these can be submitted:</p> <ul style="list-style-type: none"> • Government ID <ul style="list-style-type: none"> ○ State, territory, or tribal non-driver’s identification card ○ State-, territory-, or tribal-issued driver’s license • Passport <ul style="list-style-type: none"> ○ Unexpired passport book / card <p>To be considered valid, identification must include a clear photograph of the individual bearer, along with name matching the name:</p> <ul style="list-style-type: none"> • As entered in online application; and • As referenced in the notarized credential request letter

<p>Articles of Incorporation (PDF)</p>	<p>Any (1) of these can be submitted:</p> <ul style="list-style-type: none"> Articles of Incorporation Articles of Amendment <p><i>NOTE: The name and address must match be present on the document and match name and address provided on the application and other documents submitted.</i></p> <p>If your Articles of Incorporation documents do not display your business address (<i>for example the state of Delaware often issues their Articles of Incorporation documents without the address or with the address of a Delaware Registering Agent</i>) OR an address that doesn't match your current address, then this document alone is not an acceptable form of identity. In this scenario: Provide one (1) Additional Proof of Corporate Identity with your Articles of Incorporation. Any one (1) of the below government-issued documents can be submitted. Note the organization name and address must be printed on the document and match what was entered on your online onboarding application:</p> <ul style="list-style-type: none"> Articles of Incorporation with the related Service Request Invoice displaying SR#, organization name, and organization address (see sample Service Request Invoice from Delaware) Copy of State Board of Pharmacy or State Department of Health Issued Certificate Copy of DEA Controlled Substance Registration Certificate Copy of Form 10-K Filing Annual Report (United States Securities And Exchange Commission), Copy of Secretary of State Annual Report Copy of DEA License.
<p>IRS Employer Identification Number (EIN) Letter (PDF)</p>	<p>Any (1) of these can be submitted:</p> <ul style="list-style-type: none"> IRS EIN Assignment Letter (SS-4) IRS Address Change Notice (CP148A) IRS EIN Verification Letter (147C letter) Certification of U.S. Residency for Tax Treaty Purposes (IRS Form 6166) <p><i>NOTE: The name and address must match be present on the document and match name and address provided on the application and other documents submitted.</i></p>

Step B2: Once all data/burdens of proof are entered, the **SUBMIT** button will be enabled. *NOTE: The due diligence process WILL NOT begin until you click the **SUBMIT** button to submit your identity credential request to Legisym for processing.*

Form Buttons	Action Taken
	<p>If you click SAVE AND EXIT, all completed form fields will be saved. You will then be returned to your digital wallet provider's portal.</p>
	<p>If you click CLEAR, all data field entries will be clear to start the form over.</p>
<p>Cancel</p>	<p>If you click CANCEL, any progress made will not be saved; you will be returned to your digital wallet provider's portal.</p>
	<p>If you click SUBMIT: Legisym will automatically be notified that your application has been submitted and is ready for their review. Unlike the DEA Signing Certificate process, use of Notarized Company Documents requires manual review and may take a few days to complete the due diligence process.</p>

STEP 2: Issuance of Your Identity Credential

Once Legisym’s due diligence process is completed, a decision will be made to either **Issue** your Identity Credential or **Reject** your request for an Identity Credential.

If your application passes Legisym’s automated and/or manual due diligence processes for remote identity proofing, your Identity Credential will be automatically issued to your private, digital wallet provided by your digital wallet provider. Legisym will perform continuous monitoring in the background to identify possible triggers for revocation or recertification of your Identity Credential.

If your application fails Legisym’s automated and/or manual due diligence processes for remote identity proofing, you will be notified by Legisym via email and provided with option(s) to resolve any pending issue(s) with your application.

STEP 3: Requesting Your DSCSA ATP Credential

Before a DSCSA ATP Credential can be issued to your wallet, you must first have a valid, Identity Credential. Then sufficient evidence is required to be gathered and documented regarding the status of the regulator-issued license (i.e. Board of Pharmacy (BOP); Department of Health (DOH)) and/or registration record (FDA)

Depending upon which **Organization Type** you selected during your Identity Credential onboarding, you will proceed with the below steps for a DSCSA ATP Credential as either:

A. Applying as a Dispenser

To determine your ATP status, you will provide:

Required Text Fields	Additional Notes
State-Issued License Number	Enter your state license number as issued by the Board of Pharmacy (BOP) or State Department of Health (DOH).
Issuing State	Select the state from the dropdown menu that issued your license

B. Applying as a Wholesaler or 3PL

To determine your ATP status, you will provide:



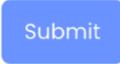
Required Text Fields	Additional Notes
State-Issued License Number	Enter your state license number as issued by the Board of Pharmacy (BOP) or State Department of Health (DOH).
Issuing State	Select the state from the dropdown menu that issued your license

C. Applying as a Manufacturer or Repackager

To determine your ATP status, you will provide:

Required Text Fields	Additional Notes
FDA Establishment Identifier (FEI #)	<p>Enter your FEI number as issued by the FDA</p> <p>NOTE: If you fall into the category of a Virtual Manufacturer (<i>and therefore do not have their own FEI #</i>), you will need:</p> <ul style="list-style-type: none"> Your product labeler code or evidence that you hold an NDA, ANDA, or BLA for a product; AND FEI # of one of your CMOs (or CLPs) who manufacture at least one of your products.

Once all data/burdens of proof are entered, the **SUBMIT** button will be enabled. *NOTE: The due diligence process WILL NOT begin until you click the **SUBMIT** button to submit your ATP credential request to Legisym for processing.*

Form Buttons	Action Taken
	If you click CLEAR , all data field entries will be clear to start the form over.
	If you click CANCEL , any progress made will not be saved; you will be returned to your digital wallet provider's portal.
	If you click SUBMIT : Legisym's automated due diligence processes will be triggered and will provide a response in real time.

STEP 4: Issuance of Your DSCSA ATP Credential

Once Legisym's due diligence process is completed, a decision will be made to either **Issue** your DSCSA ATP Credential or **Reject** your request for a DSCSA ATP Credential.

If your application passes Legisym's automated and/or manual due diligence processes for ATP status, your DSCSA ATP Credential will be automatically issued to your private, digital wallet provided by your digital wallet provider. Legisym will perform continuous monitoring in the background to identify possible triggers for revocation or recertification of your DSCSA ATP Credential.

If your application fails Legisym's automated and/or manual due diligence processes for ATP status, you will be notified by Legisym via email and provided with option(s) to resolve any pending issue(s) with your application.