



## SOC 3

# SERVICE ORGANIZATION CONTROL REPORT ON CONTROLS RELEVANT TO SECURITY, CONFIDENTIALITY, AND AVAILABILITY

For Templafy Services

For the period January 1, 2022 through December 31, 2022

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## **Section I:**

**Independent service auditor's assurance  
report provided by Conclude Accountants**

## Independent service auditor's assurance report provided by Conclude Accountants

To the Templafy Aps Board of Directors:

### Scope

We have examined Templafy's (the "Service Organization" or "Templafy") accompanying assertion titled "Templafy's management assertion" (the "assertion") that the controls within Templafy's in-scope services and offerings for its Services pertaining to document creation, collaboration, productivity, and email signature ("system") were effective throughout the period 1 January 1, 2022 to December 31, 2022, to provide reasonable assurance that Templafy's service commitments and system requirements were achieved based on the trust services criteria for security, availability, and confidentiality (applicable Trust Services Criteria), set forth in TSP section 100, 2017 Trust Services Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy (AICPA, Trust Services Criteria).

Templafy uses Public Cloud Service Provider Microsoft Azure. The description includes only the control objectives and related controls of Templafy and excludes the control objectives and related controls of Microsoft Azure. Our examination did not extend to controls of Microsoft Azure, and we have not evaluated the suitability of the design or operating effectiveness of such controls.

### Service Organization's Responsibilities

Templafy is responsible for its service commitments and system requirements and for designing, implementing, and operating effective controls within the system to provide reasonable assurance that Templafy's service commitments and system requirements were achieved. Templafy has also provided the accompanying assertion about the effectiveness of controls within the system. When preparing its assertion, Templafy is responsible for selecting, and identifying in its assertion, the applicable trust services criteria and for having a reasonable basis for its assertion by performing an assessment of the effectiveness of the controls within the system.

### Service Auditor's Responsibilities

Our responsibility is to express an opinion, based on our examination, on whether management's assertion that controls within the system were effective throughout the period to provide reasonable assurance that the Service Organization's service commitments and system requirements were achieved based on the applicable trust services criteria. We performed our examination in accordance with Dutch law, including Dutch Standard 3000A 'Assurance-opdrachten anders dan opdrachten tot controle of beoordeling van historische financiële informatie (attest-opdrachten) (assurance engagements other than audits or reviews of historical financial information (attestation engagements)). Those standards require that we plan and perform our examination to obtain reasonable assurance about whether management's assertion is fairly stated, in all material respects.

Our responsibilities in this regard are further described in the 'Service Auditor's Responsibilities' section of our assurance report. We are independent of Templafy in accordance with the 'Verordening inzake de onafhankelijkheid van accountants bij assurance-opdrachten' (ViO, Code of Ethics for Professional Accountants, a regulation with respect to independence). Furthermore we have complied with the 'Verordening gedrags- en beroepsregels accountants' (VGBA, Dutch Code of Ethics). We believe that the assurance evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Our examination included:

- Obtaining an understanding of the system and Templafy's service commitments and system requirements;
- Assessing the risks that controls were not effective to achieve Templafy's service commitments and system requirements based on the applicable trust services criteria;
- Performing procedures to obtain evidence about whether controls within the system were effective to achieve Templafy's service commitments and system requirements based on the applicable trust services criteria.

Our examination also included performing such other procedures as we considered necessary in the circumstances.

### **Inherent Limitations**

There are inherent limitations in the effectiveness of any system of internal control, including the possibility of human error and the circumvention of controls. Because of their nature, controls may not always operate effectively to provide reasonable assurance that the Service Organization's service commitments and system requirements were achieved based on the applicable trust services criteria. Also, the projection to the future of any conclusions about the effectiveness of controls is subject to the risk that controls may become inadequate because of changes in conditions or that the degree of compliance with the policies or procedures may deteriorate.

### **Opinion**

In our opinion, management's assertion that the controls within the Service Organization's system were effective throughout the period 1 January 1, 2022 to December 31, 2022, to provide reasonable assurance that Templafy's service commitments and system requirements were achieved based on the applicable trust services criteria is fairly stated, in all material respects.

On behalf of Conclude Accountants,

*Conclude Accountants B.V.*

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**P.J. van Glaanen Weijgel RA**

**Responsible RA**

Utrecht | 6 January, 2023



**Section II:**  
**Templafy's management assertion**

## Templafy's management assertion

We are responsible for designing, implementing, operating, and maintaining effective controls within Templafy (the "Service Organization" or "Templafy") related to in-scope services and offerings for its Services pertaining to document creation, collaboration, productivity, and email signature ("system") were effective throughout the period 1 January 1, 2022 to December 31, 2022, to provide reasonable assurance that Templafy's service commitments and system requirements were achieved based on the trust services criteria for security, availability, and confidentiality (applicable Trust Services Criteria), set forth in TSP section 100, 2017 Trust Services Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy (AICPA, Trust Services Criteria). Our description of the system is presented in Section III and identifies the aspects of the system covered by our assertion.

Templafy uses Public Cloud Service Provider Microsoft Azure. The description includes only the control objectives and related controls of Templafy and excludes the control objectives and related controls of Microsoft Azure. The description also indicates that certain Trust Services Criteria specified therein can be met only if Microsoft Azure's controls assumed in the design of Templafy's controls are suitably designed and operating effectively along with the related controls at the Service Organization. The description does not extend to control of Microsoft Azure.

However, we perform annual due diligence procedures for third part sub-service providers and based on the procedures performed, nothing has been identified that prevents Templafy from achieving its specified service commitments.

We have performed an evaluation of the effectiveness of the controls within the system throughout the period 1 January 1, 2022 to December 31, 2022, to provide reasonable assurance that Templafy's service commitments and system requirements were achieved based on the trust services criteria relevant to security, availability, and confidentiality ("applicable trust services criteria") set forth in TSP section 100, 2017 Trust Services Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy (AICPA, Trust Services Criteria). Templafy's objectives for the system in applying the applicable trust services criteria are embodied in its service commitments and system requirements relevant to the applicable trust services criteria.

There are inherent limitations in any system of internal control, including the possibility of human error and the circumvention of controls. Because of these inherent limitations, a service organization may achieve reasonable, but not absolute, assurance that its service commitments and system requirements are achieved.

We assert that the controls within the system were effective throughout the period 1 January 1, 2022 to December 31, 2022, to provide reasonable assurance that Templafy's service commitments and system requirements were achieved based on the applicable trust services criteria.

On behalf of Templafy,



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**Ellen Benaim**

**CISO**

Copenhagen | 6 January, 2023



**Templafy<sup>T</sup>**

**Section III:**

**Description of the boundaries of the  
Templafy system**

## The Templafy organization

### System overview and background

Templafy ApS (Templafy), headquartered in Denmark, is a business enablement Software-as-a-Service (SaaS) platform that provides document creation, collaboration, productivity and email signature tools (Services) for users of Microsoft Office and Google Suite, supporting every step of the document creation workflow. Templafy was founded in 2014 and has been fast-growing since, with employees in Denmark, the USA, The Netherlands, Germany, the UK and Australia.

Templafy is committed to achieving and maintaining the trust of its customers. Integral to this mission is providing a robust security and privacy program that carefully considers data protection matters across the suite of Services by design and default, including data submitted by customers to the Templafy Services. Templafy’s enterprise customers span most industries globally, such as banking, financial services, professional services, industry, health, education and governmental. Both Templafy and its Services are crafted to meet their security, confidentiality and compliance requirements.

Templafy is a multi-tenant SaaS platform. Each organization that uses Templafy Services shares a set of resources. The main interaction point for end-users is the Templafy web application and the Templafy add-ins. Add-ins are provided via Application Programming Interfaces (APIs) and add-in models by Microsoft and Google. Furthermore, Templafy integrates into or with Document Management Systems, Customer Relationship Management (CRM) solutions, Digital Asset Management (DAM) solutions and Enterprise Resource Planning (ERP) solutions via APIs.

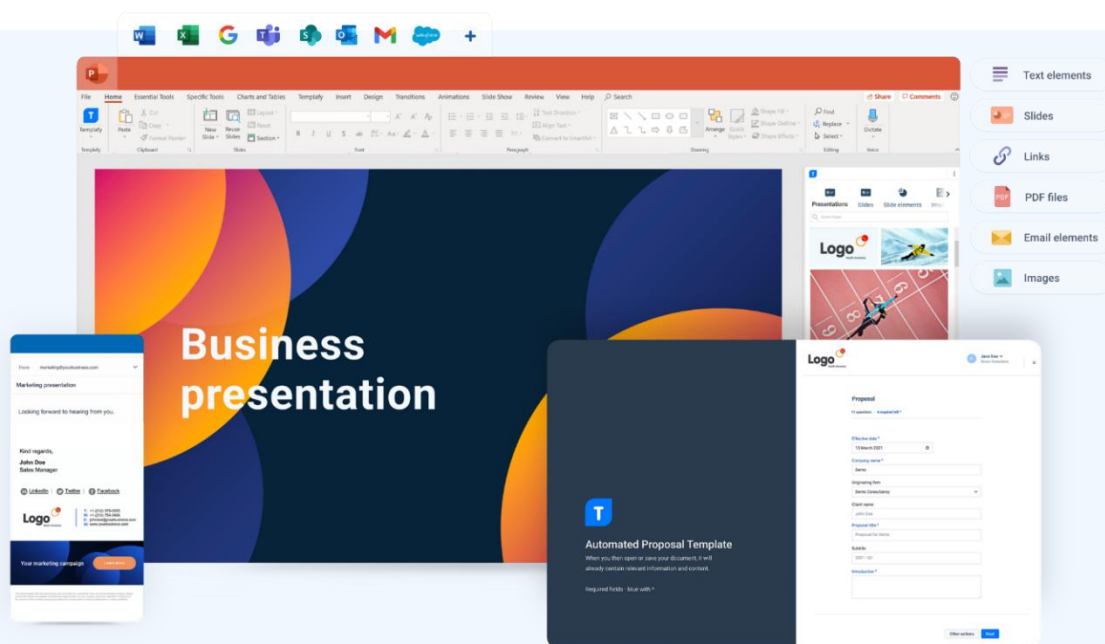


Figure 1 Templafy user experience



Figure 2 Templafy Single sign-on and data flow

### Description of covered Services

The scope of this report covers the Templafy Services described in *Figure 3*. Templafy provides various tools to enable professionals to create better performing documents faster through connected content.

	Service Name	Service Description
<b>Platform</b>	<i>One</i>	<p>Real-time management and distribution of document templates and digital assets. Filtering and access management with filters and AI (Artificial Intelligence) powered tags. Role-based access control (RBAC) of user access rights throughout the platform.</p> <p>Add-ons to content distribution:</p> <ul style="list-style-type: none"> <li>• Font Distributor distributes and manages fonts across the whole organization for font control.</li> <li>• Offline content distribution.</li> </ul> <p>Integrations management:</p> <ul style="list-style-type: none"> <li>• DAM integration</li> <li>• CRM integration</li> <li>• DMS integration</li> </ul>
	<i>Hive</i>	<p>Templafy Hive is the second iteration of the platform. Templafy moved from a monolithic architecture to a microservices architecture and structured our software in separate, connected units.</p> <p>Real-time management and distribution of document templates and digital assets. Filtering and access management with filters and AI powered tags. Role-based access control (RBAC) of user access rights throughout the platform. EU data protection access filter and activity log available to customer admins.</p> <p>Add-ons to content distribution:</p> <ul style="list-style-type: none"> <li>• Font Distributor distributes and manages fonts across the whole organization for font control.</li> <li>• Offline template distribution and access.</li> <li>• Spaces for content libraries to manage and distribute document templates and digital assets in real-time management to a specific group.</li> </ul> <p>Integrations management:</p>

- App connector (e.g., Office applications, Office 365, Salesforce, G-Suite, Teams).
- Data connector (e.g., Salesforce, Highspot and other company data sources).
- Content connector (e.g. Bynder, Aprimo and other company DAM solutions).
- Delivery connector (e.g., SharePoint, Highspot and other company DMS solutions).

**Modules**

<i>Library</i>	<p>Direct access to the latest business document assets like slides, graphs, text elements, images etc. through a user-friendly task pane add-in inside document creation applications. Filtered access to relevant assets based on user profile and office location.</p> <p>Integrate and connect with company image banks and digital asset management applications to bring all the relevant assets close to the user (optional).</p>
<i>Dynamics</i>	<p>Templates: Building, updating, and maintaining automatically personalized templates with brand and compliance information through dynamic content fields.</p> <p>Metadata: Dynamically inserted metadata and data loss prevention (DLP) information</p> <p>Compile: Building, updating, and maintaining complex documents like sales quotes, contracts and quarterly reports becomes an easy task.</p>
<i>Validator</i>	<p>Chosen PowerPoint presentations validated against up-to-date latest versions uploaded in Templafy. Easy update of re-used presentations through a simple popup appearing right in PowerPoint.</p>
<i>ProductivityPlus</i>	<p>Pro-presentations made easy using intuitive features designed to build complex slides while making professional formatting simple.</p> <p>Import and link tables, data cells, and graphs from Excel to PowerPoint with a simple copy-paste. Keep the linked data up to date with real-time update function.</p>
<i>Check</i>	<p>Check function inspects documents against up-to 40 pre-defined rules and ensures that the content, format, and layout are professional.</p>

		<p>Fix format, layout, and content compliance issues fast with one click before sending. Get an overview of issues in the Templafy task pane and use the Fix button to quickly amend the presentation.</p>
	<p><i>Email signature manager</i></p>	<p>Unified look and feel for all email signatures for enterprise-wide use, and support for multiple signatures per user.</p> <p>Management of multiple brands and office locations in one dynamic layout through our easy-to-use centralized platform. Real-time roll out and updates of email signatures and seasonal campaigns.</p> <p>Email signatures for Outlook Online, Windows, Mac and Mobile. Email signature servers hosted by Templafy or clients themselves.</p> <p>Add on: Advanced mobile signature hosting solution for no re-routing of emails outside of company servers with self-hosting.</p>
	<p><i>Engage</i></p>	<p><i>Only available on Templafy Hive platform</i></p> <p>Document sharing embedded into the organic workflow of every employee. Curated collaboration workflows optimize the approval process, contract negotiations and co-creation. Document insights dashboard with actionable data transforms every business document into performing one.</p>

Figure 3 Templafy Services

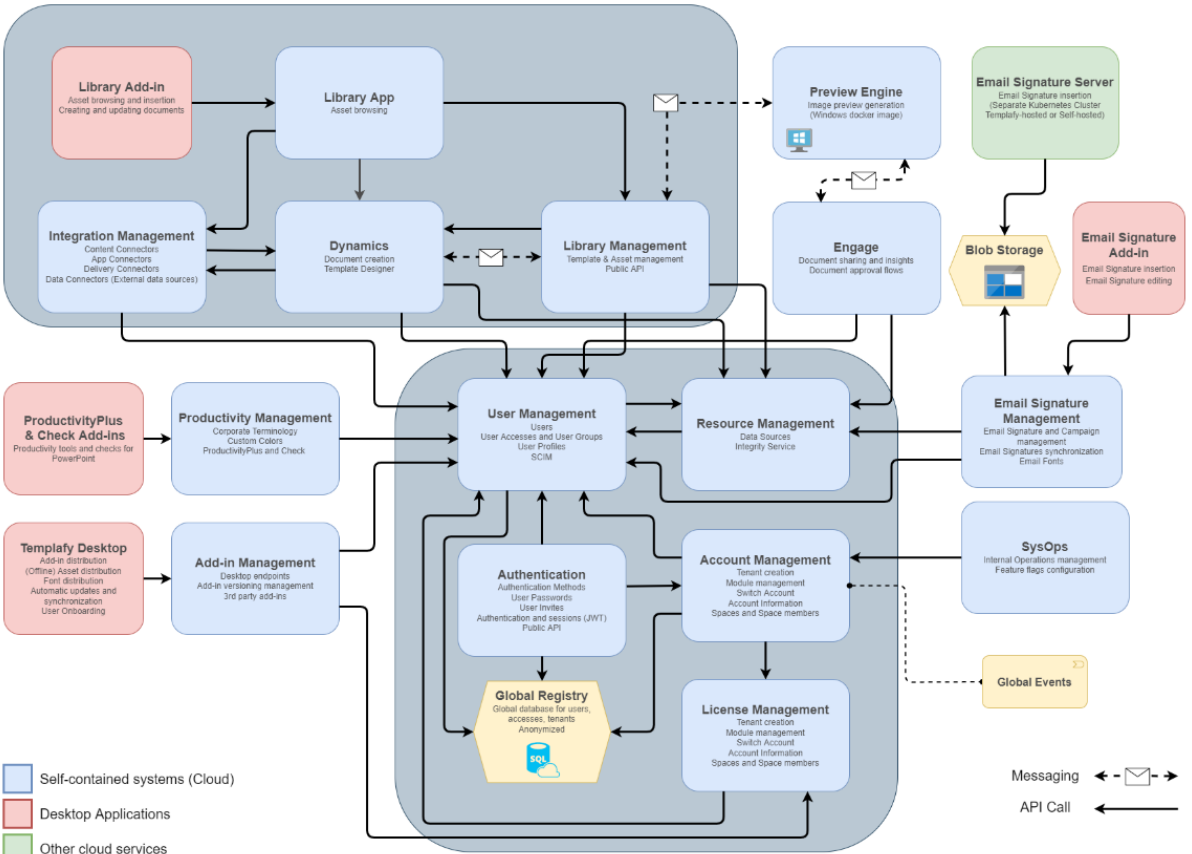


Figure 4 Self-contained system architecture

## Components of the system providing services

### Overview of Templafy architecture

Templafy Services are operated in a multi-tenant architecture that is designed with tenant isolation to segregate and restrict customer data access based on business needs. The architecture provides logical data separation for different customers via customer-specific unique identifiers and allows the use of customer and user role-based access privileges. Templafy Hive is made up of self-contained systems. Each self-contained system runs in a docker container hosted in Azure Kubernetes Service (AKS) to support millions of daily users. Templafy uses Infrastructure-as-Code with a focus on security and DevSecOps techniques. Additional data segregation is maintained by providing separate environments for different functions, including for testing and production. Product functionality and system architecture are designed with security by design and default.

### Infrastructure

Function	Description
Public Cloud Service Provider	<b>One</b>
Microsoft Azure	North Europe (Primary) and West Europe (Secondary)
	<b>Hive</b>
	West Europe (Primary) and North Europe (Secondary)
	East US (Primary) and West US (Secondary)
	Australia East (Primary) and Australia Southeast (Secondary)
	Central Canada

### Software

Function	Description
Operating Systems	Kubernetes Linux Docker Windows Server
Databases	Microsoft SQL server and databases
Monitoring Systems	There are multiple monitoring systems in use, including: <ul style="list-style-type: none"> <li>• Azure Monitor</li> <li>• Microsoft Defender for Cloud</li> <li>• Microsoft Defender for Cloud Apps</li> </ul>



- Microsoft Defender for Storage
- Azure Security Center
- Advanced Threat Protection
- Azure Application Insights
- Azure Container Insights
- Azure Sentinel
- WhiteHat Security
- SonarCloud

#### Network Infrastructure

Templafy Services' network infrastructure utilizes a common set of network components, including:

- Azure Load Balancer
- Azure Firewall
- NGINX
- Azure Virtual Network
- Network Security Group

#### Core systems

##### Microsoft Azure

- Azure App Services
- Azure Kubernetes Service
- Azure Key Vault
- Azure CDN
- Azure Cognitive Services
- Azure Storage Accounts
- Azure Network Watcher
- Azure Service Bus
- Azure Data Lake
- Azure DNS

Amazon Simple Email Service (SES)

SendGrid

Azure DevOps

#### Supporting systems

Dashlane

PagerDuty

StatusPage

Zendesk

Aha!

Slack

Endpoint protection	Microsoft Intune
	Microsoft Defender for Endpoint
	Defender Advanced Threat Protection (ATP)
	BitLocker
	Windows Firewall
	FileVault (macOS)
	Apple Firewall (macOS)

Figure 5 Infrastructure components

### People

Templafy’s structure is documented in its organizational chart, which shows the separation of duties and levels of oversight. The CEO leads the company, and there are multiple C-Suites who report to the CEO. Templafy’s board of directors is comprised of representatives that are independent of management. The following teams are in-scope as their job responsibilities require that they have access to production systems, develop code to be included in the environment or supporting operational and advisory functions:

Department	Responsibilities covered (Non-exhaustive)	Office Location
Engineering	Change, development, security and availability responsibility over Templafy Services	Copenhagen
		Berlin
		Eindhoven
Technical Operations	Deliver and support to customers	Copenhagen
		Berlin
		Eindhoven
		New York
Information Security	Security and privacy over Templafy Services and Templafy	Copenhagen
		Berlin
		Eindhoven
IT	Provision and manage employee laptops and desktops	Copenhagen
	Mobile device management	Berlin
	Network management	Eindhoven

Customer Success	Enable the customer usage of Templafy Services	Copenhagen Berlin Eindhoven New York
Product	Strategic direction and prioritization of Templafy Services roadmap	Copenhagen Berlin Eindhoven
People+	Onboarding/offboarding employees Employee background checks Performance management	Copenhagen Berlin Eindhoven New York

Figure 6 Templafy departments

### Process and procedures

Templafy has implemented an Information Security Management System (ISMS) based on the International Organization of Standards (ISO) Codes of Practice for Information Security Management ISO/IEC 27000:2017 standard. Templafy chooses to focus on the highest quality level of controls to achieve a risk-based approach in preserving the confidentiality, integrity and availability of information. Organization-wide, Templafy is committed to continually improving the suitability, adequacy and effectiveness of the ISMS. Templafy has extensive information security policies and procedures pertaining to confidentiality, integrity and availability, such as:

- Information security
- Risk management
- Access control
- Physical and environmental security
- Personnel security
- Awareness and training
- Asset management
- Cryptography
- IT operations
- Network and information transfer
- Software development lifecycle
- Change management
- Vulnerability management
- Supplier risk management
- Incident response management
- Business continuity and disaster recovery

## Data

### Customer agreements

Customer data means electronic data and information submitted by or for the customer to the Templafy Services as defined by the publicly available Templafy General Terms and Conditions Agreement (SaaS agreement). Templafy has an information classification and handling standard and has classified customer data as confidential, the highest level. Templafy complies with privacy standards and is governed by a data processing agreement to ensure the data receives the appropriate level of protection. Customers are covered under Templafy's data processing agreement available on the website unless a contract is otherwise entered.

Templafy retains and disposes of customer data in a secure manner in accordance with customer agreements and information classification and handling standard. Customer data is disposed 90 days after termination of customer contract, and as soon as possible for active customers requesting specific data removal.

### Customer data elements

Templafy stores public enterprise information such as office locations and legal disclaimers, digital assets (such as office templates, email signatures, text snippets, images for image library, icons). All these digital assets that are provided by customer admins and uploaded to the system. Digital assets are stored in a unique Azure Blob storage for each customer. Validation checks are performed upon files upload and restrictions to certain file types are enforced. Content length limit is in place for all requests. Input validation on front-end with property size check (e.g., string length, valid email address) before the back-end APIs are called. Back-end checks ensure full validation on domain layer and database layer.

Contact information about employees such as name, job title, work email, work phone numbers and work location are stored to personalize the templates for the users. User profile information is stored in a logically segregated SQL database. Users are authenticated based on customer admin selected authentication method. Customer admins determine which user profile data elements are processed by Templafy and modifiable by customer end-users. Templafy supports just-in-time (JIT) provisioning, single-sign on (SSO), multi-factor authentication (MFA), and on-boarding against customer Active Directories (AD).

### Templafy data flow

Users access Templafy in the web application or application add-in (e.g., Word, PowerPoint). Add-ins are provided via Application Programming Interfaces (APIs) and add-in models by Microsoft and Google. Templafy also integrates into or with DMS, CRM solutions, DAM solutions and ERP solutions via APIs. APIs are subject to vulnerability scans and penetration testing.

A user starts the document generation flow by selecting a template file in the web application or application add-in. User profile information is retrieved from the SQL database and added to the template to personalize it as directed for the user.

Templates may have gating questions' answers injected into it as configured by customer admins, which the user can answer through a form interface. Templafy connects the template, any user profile information, data source information and the answers to the gating questions in a background job. The data filled template is permanently deleted after twenty-four hours from the unique temporary blob storage which is required to perform the injection. The end-user receives a read-only shared access signature (SAS) download link valid for a few minutes, where the final template is generated onto the local machine. The SAS link facilitates secure communication when data is stored in the blob storage.

The connection to Templafy ends here. The user can then use the data filled template to build further to the document or presentation, which is not stored back to Templafy. The file is shared on the customer's own local or cloud DMS. All requests throughout the document generation process are encrypted in transit and valid authentication of the user is required.

## **Relevant aspects of the control environment, risk assessment, information and communication, monitoring**

As defined by the Committee of Sponsoring Organizations of the Treadway Commission (COSO), this section provides information about the five interrelated components of internal control at Templafy:

- **Control Environment.** Sets the tone of an organization, influencing the control consciousness of its people. It is the foundation for all other components of internal control, providing discipline and structure.
- **Risk Assessment.** The entity's identification and analysis of relevant risks to the achievement of its objectives, forming a basis for determining how the risks can be managed.
- **Control Activities.** The policies and procedures that help make sure that management's directives are carried out.
- **Information and Communication.** Systems, both automated and manual, that support the identification, capture, and exchange of information in a form and time frame that enable people to carry out their responsibilities.
- **Monitoring.** A process that assesses the quality of internal control performance over time.

### **Control environment**

#### *Organizational structure and assignment of authority and responsibility*

The board of directors and executive management play an integral role in demonstrating from the top the importance of security, including integrity and ethical values throughout the organization.

Information security is seen as a key strategic initiative, therefore the Chief Information Security Officer (CISO) reports directly to the chairman of the board of directors and meets regularly, at least quarterly, to discuss ongoing security efforts. The CISO is the head of the information security department. The information security team implements the Information Security Management System (ISMS) and provides security guidance throughout the organization.

*Chairman of the Board of Directors:* The Chairman of the Board of Directors oversees information security overall, sets strategic direction and assigns priority to support the information security objectives in Templafy. They allocate investment in alignment with the organization strategy and risk profile. They review Templafy's information security program's adequacy and effectiveness on a frequent basis. They have oversight of strategic security risks and provide prioritization and advisory.

*CISO:* The Chairman of the Board of Directors and Management Team have appointed a Chief Information Security Officer (CISO). The CISO is overall responsible for designing, implementing and monitoring a strategic, comprehensive Templafy-wide information security strategy aligned to the overall organization strategy. The CISO is a member of the Management Team and reports directly to the Chairman of the Board of Directors. The CISO reports to the Board at least annually. The CISO appoints and manages the Information Security department.

*Management team:* The Management team endorses and supports the development and implementation of a comprehensive information security program and its components. They review the status and impacts of security initiatives and act appropriately on management reports concerning information security performance metrics, security incidents and risks, investment requests, policy exceptions etc. The Information Security department's budget is approved in line with the budget process set by the Management team.

*Information Security department:* The Information Security department acts as a design and operational function, and the members work with various business units and other operational entities to implement a consistent and Templafy-wide information security program. The Information Security department are responsible for defining technical and non-technical information security standards, procedures and guidelines and supporting Templafy leaders and employees in the definition and implementation of controls, processes and supporting tools to comply with the information security policies and manage information security risks.

*Leaders:* Leaders must ensure their employees are informed of their obligations to fulfil the Information Security Policy where relevant to their roles and lead by example in respective departments. Leaders must actively support the associated information security objectives and initiatives by providing the direction, resources, support and reviews necessary to ensure that information assets are appropriately protected within their area of responsibility. Leaders must monitor compliance and remind users of their obligations and escalate non-conformities as required.

Management communicates and oversees the requirements regarding conduct, professional integrity, and ethics by making the code of conduct available in Templafy's internal SharePoint site and through documents signed by employees.

### *Personnel security*

*Awareness training:* Templafy has a strong security-first mindset due to repeated emphasis and communication around numerous security topics to all the organization on a frequent basis. Templafy has put in place security awareness initiatives and a training awareness program. All employees and contractors receive information security awareness training at onboarding, and at least annually thereafter.

The security awareness training covers information on relevant security best practices and includes the responsibility of every employee and contractor to communicate security concerns. Job-specific training is provided to personnel where appropriate. Awareness is raised with weekly security updates in town hall meetings, communication efforts via email, and internal communication tools.

New employees are required to review and acknowledge their receipt of the Information Security Policy, Acceptable Use Policy, and Information Classification and Handling Standard during onboarding. Confidentiality and intellectual property rights clauses are included in employment contracts. Once employed, employees are subject to Templafy's procedures and sanctions for violating Templafy's information security policies.

*Onboarding and offboarding:* Templafy has a process for revoking system and building access and returning assigned assets. This is integrated into the onboarding and offboarding process within the Human Resource (HR) system. The task to revoke system and building access are assigned to responsible individuals and are completed in a timely manner.

The People+ team is responsible for ensuring the onboarding and offboarding tasks are completed correctly and within stated time intervals. For a change of roles or position change, an automatic alert is generated from the HR system to the information security team and based on this alert, a review is conducted as to the appropriate levels of access. Subsequent action is taken based on the review. Periodic access reviews are conducted as described in the logical security section.

*Background checks:* Background checks are performed on new employees, before they start at Templafy, who will have access to the production environment or production data, as permitted by local laws. Candidates are evaluated against documented job descriptions that define the skills, responsibilities and knowledge levels required for all critical roles in the organization. The background checks performed include identity verification, employment verification, professional reference checks and criminal record check. Due to local restrictions in Germany and The Netherlands, a criminal record check cannot be performed in these countries, however; a criminal conduct search is performed instead. In the United States, a criminal felony and misdemeanor search within the last seven years is carried out.

*Disciplinary process:* A process and submission form are in place to facilitate anonymous notification of inappropriate behavior, including non-compliance with the Information Security Policy and its supporting standards. A formal disciplinary action process is enforced for personnel failing to comply with the established Information Security Policy and standards, where all reports of non-compliance are investigated by the People+ team, information security team, and other department representatives as required, through to resolution.

## Risk assessment

Templafy has established an organization-wide information security risk assessment process to identify and manage information security risks across the organization. It enables Templafy to identify, evaluate, and mitigate the risks that may threaten the achievement of its service commitments and system requirements related to security, availability, and confidentiality based on the applicable trust services criteria set forth in TSP Section 100, 2017 Trust Services Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy (AICPA, Trust Services Criteria).

Templafy performs an annual risk assessment that covers security, privacy, continuity and operational risks. The risk management process is derived from ISO 27005 and aligned with the COSO 2013 framework. As part of this process, threats to security are identified, and risks from these threats are formally assessed. Security risks related to external parties (such as customers, contractors, sub-processors and suppliers) are identified and addressed. The assessments include threats, vulnerabilities, impact, likelihood and mitigating controls. Following the risk assessment, a risk treatment plan is implemented to mitigate risks. After the treatment plan is evaluated and residual risk rating obtained, acceptance is obtained from risk owners.

Changes in security threats and risks are reviewed by the information security team, and updates to existing control activities and information security policies are performed, as necessary. The CISO, as part of the annual management review of security, considers developments in technology and the impact of applicable laws and regulations to Templafy's security policies. The chairman of the board of directors receives reports on a quarterly basis covering the main ongoing risks and the management review report on security at year-end.

## Control activities

### *Software development lifecycle*

Templafy has a Secure Development Lifecycle (SDLC) methodology across each of the engineering teams, aligned with the best security standards such as ISO/IEC 27001, and follows Scrum and Agile approaches.

Detailed policies and processes for the development of the Templafy Services have been designed with optimal security and quality in mind. The principles of security by design and default are implemented and rooted in training, coaching, pair programming, code review comments, coding tools and branch policies in Azure DevOps. Templafy has implemented segregated environments for



development, test and production as a means to support segregation of duties and prevent unauthorized changes to production. In addition, production data is not used or copied to non-production environments. Test scripts and synthetic data are created for use in the development and staging environments.

### *Change management*

Changes are prioritized in collaboration with product owners and engineering teams. Information security and availability considerations are core components in application development and testing. Project management frameworks are used to manage application development and testing, and roles and responsibilities are identified throughout the system development lifecycle.

Azure DevOps is used to plan, schedule, approve, apply, distribute, and track changes to the production environment with designated responsibilities and enforced through branch policies. It controls the integrity and reliability of the environment while maintaining a continuous delivery model without downtime.

All application code changes are tested, peer-reviewed and approved prior to implementation into production. The production and non-production environments are deployed in their own Azure Active Directory and their own Azure Subscriptions, thus completely separated, and changes are tested according to the nature of the change in an environment separate from production prior to deployment into a production release. Tests include functionality unit testing, integration testing, smoke tests, manual regression testing and load testing. Extensive security testing is conducted (see vulnerability management section).

All change requests are logged, whether approved or rejected, on a standardized central system. The approval of all change requests and the results thereof are documented. Access to migrate change to production requires formal approval and is restricted to authorized personnel. Code management tools enforce branch protection policies to help ensure users cannot bypass standard change controls.

The Product Owner and the engineering team discuss the status and progress of all outstanding changes within the current sprint during daily stand-ups. Release notes are documented and communicated to internal and external users via the knowledge center for changes related to feature and security changes.

Templafy maintains a continuous delivery model of the Services. Patch management is incorporated into the SDLC to ensure necessary updates, fixes and other changes are timely implemented to the Services. Patches are released like any other change in Templafy's SDLC and follow the same change management procedures. Patch implementation timescales are defined to ensure timely patching in accordance with severity. Different automatic release plans are made available to customers to choose from the newest software features for testing purposes or stable and most reliable versions.

### *Baseline configuration hardening*

Templafy's security configuration standards are applied through automated deployment mechanisms to help ensure consistent application. Templafy uses secure OS configurations deployed via Kubernetes. Templafy leverages hardened Azure Public Compute Images for servers. Templafy continuously monitors all resources deployed in the Azure environment in conformity to Azure best practices, CIS benchmarks, ISO/IEC 27001, 27017 and SOC 2 compliance requirements and applies applicable recommendations after review by the security guild.

### *Encryption*

Templafy has implemented best practices regarding encryption methods and has implemented a secure process for transmitting or receiving data across open, public networks.

- Templafy One and Hive support TLS1.2.
- Data at rest is encrypted using AES 256-bit by default throughout all Azure services in use for the Templafy Services.
- TLS1.2 is used to communicate between all the Azure services in use for the Templafy Services.
- File and disk level encryption on blob storages.
- Disk level encryption on SQL database.

The transmission, movement, and removal of information are restricted to authorized internal users and processes.

Authentication towards our Azure native PaaS services is done through Azure managed identities.

The key management of Service-Managed keys for data at rest encryption is performed by Azure. The certificates used for data in transit encryption are managed using Azure Key Vault by Templafy and are subject to Templafy cryptography policy.

### *Vulnerability management*

Templafy has a vulnerability management process in place to discover, assess, remediate, and track vulnerabilities in Templafy services and supporting infrastructure. A risk assessment is carried out on the discovered vulnerabilities and a risk rating is assigned to prioritize the remediation accordingly.

The vulnerability remediation is documented in the work item in DevOps and the changes required are carried out in-line with Templafy's change management procedures as described in the change management section.

*Open-source:* Templafy only uses developed and tested open-source libraries to enhance our product offering. We have a central repository of dependencies and whitelist of approved dependencies and versions. Templafy continuously scans and tracks 3<sup>rd</sup> party dependency risks and report findings through our vulnerability management flow internally and back to dependency authors for remediation. Templafy constantly updates all our 3<sup>rd</sup> party dependencies. We use a tool called Renovate to ensure that any security or bug fixes are applied without delay. We manually review licenses for new 3<sup>rd</sup> party tools. Despite not being often, any new 3<sup>rd</sup> party dependencies go through a due diligence procedure.

*Penetration testing:* Penetration testing is conducted to measure the security posture of the Templafy Services and Infrastructure. Templafy has an external penetration test performed at least once per calendar year. The objective of those penetration tests is to identify design or functionality issues in Templafy Services that could expose Data or Customer to risks from malicious activities. Each external penetration test is performed by an internationally recognized, independent third-party software security testing company. Each penetration test (i) encompasses both the internal and external network and authenticated application layer, (ii) includes at least 80 hours of manual effort by the testing company, (iii) probes for weaknesses in network perimeters or other infrastructure elements and any weaknesses in process or technical countermeasures relating to Templafy's Services that could be exploited by a malicious party, and (iv) identifies (at a minimum) the following security vulnerabilities: invalidated or unsanitized input; broken access control; broken authentication and session management; cross-site scripting (XSS) flaws; buffer overflows; injection flaws; improper error handling; insecure storage; denial of service; insecure configuration management; proper use of SSL/TLS; proper use of encryption; and anti-virus reliability and testing.

Customer-led penetration testing can be conducted upon request to the information security team and is subject to conditions prior to carrying out the tests.

*Vulnerability scanning:* Vulnerability scanning is performed on a continuous basis by Templafy in accordance with the vulnerability management policy. Technologies used are:

- WhiteHat Security scanning for 24/7 web application dynamic application security testing (DAST),
- SonarCloud for static application security testing (SAST) before each release,
- Renovate for ensuring that open-source dependencies always are the latest available version.
- Azure Security Center and Azure Monitor for daily infrastructure, network and application vulnerability scanning. Retests and on-demand scans are performed on an as-needed basis.

*Alerts and results:* Anomalous user behavior is captured through user behavior analytic (UEBA) tooling. Centralized data loss prevention (DLP) solution is implemented as protection against data leakage. The information security team is responsible for continuous monitoring and reacting upon alerts from numerous rules from these technologies, feeding into centralized reporting dashboard. Individual vulnerabilities identified during penetration and vulnerability testing are logged to the appropriate change management software and managed through the vulnerability management process. Scan and test results are assessed by the security and engineering teams, risks for each vulnerability are identified, and remediation is approved and prioritized until resolution in a timely manner. Vulnerability reports include a client summary, which is available to Templafy's customers upon request.

#### *Log management*

All Azure resources have audit logging enabled for the Templafy Services. This includes SQL and storage accounts. All activity in the production environment performed by users and administrators are tracked. The SQL database logs are protected from modification and are kept for a minimum of 3 months.

For Templafy Services, activity logs for administrator accounts are available in the admin portal of Templafy Hive.

For its internal infrastructure, Templafy collects, correlates, and analyzes data across users, devices, applications, and infrastructure using Azure Sentinel (SIEM) and the log data is retained for 6 months. The information security team proactively hunts for threats, and reacts to threats that trigger pre-defined and configured alerts. Incidents are handled using the incident management process as described in the incident management section. All systems are configured with the same time and date to ensure traceability if an incident occurs.

#### *Logical security*

A formal, documented user account and access provisioning process is in place to assign and revoke access rights to systems and applications. Access is allocated on a least privilege basis, which means by default, account access is denied until a business need is proven, and any additional privileges require approval. Templafy uses Azure AD for centralized authentication and authorization to restrict access to the systems and services within the Templafy environment. Each user account is unique and is identifiable to an individual user.

Periodic reviews of individual accounts and security group memberships are performed by the information security team in coordination with the system owners, to evaluate and validate the user access. Remediation action is taken, as necessary, based on the review. Upon change of responsibilities, access rights are reviewed and addressed accordingly. Upon termination, access rights are revoked within 24 hours. User password standards are defined and implemented based on requirements outlined in the Templafy information security policies and the security best practices to

enforce password quality, length, and complexity. Multi-factor authentication is enforced for critical systems, where supported.

Access to customer data through the Templafy solution by Templafy employees will be granted only for customer support and success services offered in the best interest of the customer, or when a forensic investigation needs to be carried out following a security incident. The information security team is responsible for the access management to customer data and governed by the principle of least privilege. Access is monitored by the information security team that can revoke access at any time.

Access to program production data is restricted and limited to authorized personnel. Templafy has role-based access control to Kubernetes clusters. Access to production information systems is enforced via Azure AD multi-factor authentication. Appropriate identification and authentication are required to perform actions on the production environment and cannot be circumvented. Read access to system databases is provided to Senior Site Reliability Engineers. No one in Templafy has write access to production system databases.

#### *Asset management*

Templafy has an asset management program that identifies information assets and defines appropriate protection responsibilities. Any assets associated with information and information processing facilities are identified and managed throughout their lifecycle in accordance with the information classification and handling standard. The lifecycle of the information includes creation, processing, storage, transmission, deletion and destruction stages. All information assets have designated asset owners.

#### *Information classification and handling*

The information security team has established and communicated an organization-wide information classification and handling policy and standard by which information is classified, defined, exemplified, and risk assessed. The standard clarifies to all Templafy employees how to handle information throughout the information lifecycle based on its classification. The lifecycle includes authorization, confidentiality, labeling, information transfer and storage protections, transportation, retention and disposal. The policy and standard is reviewed annually or more frequently to address significant organizational changes. All Templafy employees share the responsibility for ensuring that Templafy information receives an appropriate level of protection by observing the information classification restrictions and information handling process in the standard.

#### *Endpoint management*

All end-user laptops (Windows and MacOS) and mobile devices (iOS and Android) are centrally managed using mobile device management tool Microsoft Intune, which enforce full disk encryption, endpoint protection, secure configuration and the ability to remote lock and remote wipe in the event a device is compromised. The Acceptable Use Policy requires that all work-related activities can only be performed from devices that are managed by Templafy.

Templafy uses hardened baseline configurations deployed via Microsoft Intune. Full disk encryption is configured and enforced on all end-user laptops and desktops. Templafy continuously monitors all endpoints in conformity to Microsoft and industry best practices, CIS benchmarks, ISO/IEC 27001, ISO/IEC 27017 and SOC 2 compliance requirements and applies applicable recommendations and required remediations after review by the information security and IT teams.

Anti-malware software with EDR capabilities is installed on all Windows and macOS workstations which is centrally managed and daily scanning is performed to detect any malware. Endpoints are configured with tamper protections to prevent impairment, disabling, or removal of anti-malware protection.

### *Network management*

Azure Monitor is used to monitor the status and load of each managed network device. Azure Monitor provides detailed information of system metrics in dashboards and the ability to write custom queries to get essential data for all system behavior. It is used to monitor systems' current performance and investigate any irregularities from the past. The production environment has auto-scaling enabled. Templafy production data center network traffic is routed through a distributed denial-of-service (DDoS) protection service provided by Microsoft Azure to limit the effect of denial-of-service (DoS) attacks. The cloud guild in the engineering department holds routine meetings to review system capacity and environment health. All clusters have a georedundant failover location, to ensure continuous uptime and continuation of service.

All infrastructure and network changes are performed through Infrastructure-as-Code (IaC), and as such, is subject to the same rules as pull requests for code changes. This ensures the configuration is constantly checked against a set baseline.

The site reliability engineering team actively monitors network logging for the production network. Azure DDoS protection and Security Center generate alerts subject to review and investigation. An intrusion detection system (IDS) is configured to generate alerts following breaches of thresholds. Customer traffic is managed with load balancing. Templafy's network includes a demilitarized zone (DMZ) for web-facing systems using an Azure Network Security Group.

All internal connections in the cluster are TLS 1.2 encrypted. All internal communication inside the Kubernetes cluster between microservices is running over HTTPS (by default traffic inside a Kubernetes cluster is not encrypted, as SSL traffic is terminated at the Ingress level). We added this extra layer of security, to ensure that even if one service is compromised, this cannot easily spread to other services.

All external network connections to the SQL server are protected by a firewall that verifies inbound traffic based on source and destination address, protocol and port. The site reliability engineering team maintains the whitelist regularly. Changes to the firewall are required to follow change procedures as described in the change management section.

Ngix is used as an ingress controller to route traffic to Kubernetes services. Ngix ingress controller is configured to force a redirect of all HTTP traffic on port 80 to HTTPS on port 443. Ngix is configured to use HTTP Strict Transport Security (HSTS). This means once a supported browser receives this header that browser will prevent any communications from being sent over HTTP to the specified domain and will instead send all communications over HTTPS.

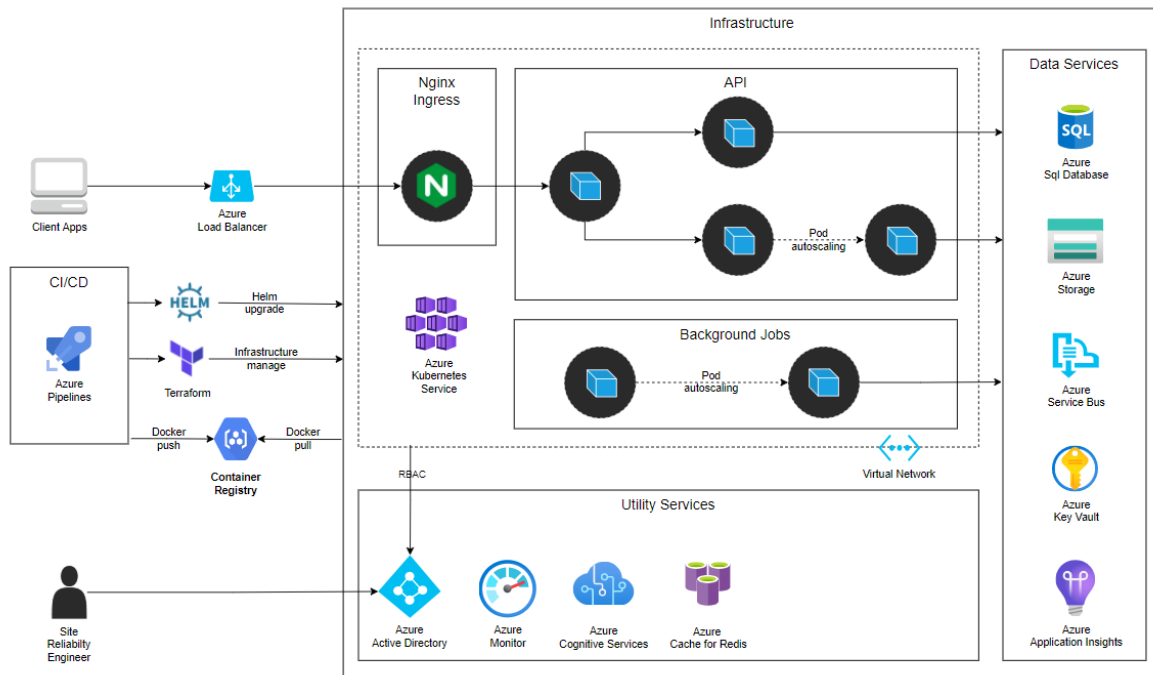


Figure 9 Production Network diagram

The corporate network supports internal business functions and is separate from the production network for each of the Templafy Services that support customer instances. Each corporate office location has multiple security controls to protect the network proportional to the risk assessment conducted on the network. Networking protocols that are not necessary for business purposes and/or are deemed to be non-secure are disabled. The corporate networks are segregated into VLANs based on business requirements.

### Incident management

Templafy has implemented an incident management policy that includes defined processes, roles, communications, responsibilities and procedures for detection, escalation and response to incidents internally and to customers.

Templafy's information security team uses the established incident classification, escalation and notification process for assessing an incident's criticality and severity. Response procedures are specific and reflect the nature of the incident. Incident and resolution analysis are carried out by the information security team to reduce the likelihood or impact of a future incident.

Incident procedures in relation to data privacy breaches have been implemented and include how and when to communicate with the data controller affected and the relevant authorities. Procedures for a forensic investigation of a security incident are in place when necessary to support potential legal action.

In the event of a Security Incident, Templafy provides customers with a detailed description of the Security Incident and the type of Personal Information concerned, unless otherwise prohibited by law or otherwise instructed by a law enforcement or supervisory authority. Templafy notifies without undue delay (and in any event within thirty-six (36) hours) inform affected customer in writing. Following the notification, Templafy takes reasonable steps to mitigate the effects of the Security Incident and to minimize any damage resulting from the Security Incident. Templafy assists and cooperates with affected customers with any necessary or appropriate disclosures and other investigative, remedial, and monitoring measures as a result of the security incident. Customers can report suspected security incident to Templafy via our [external incident reporting form](#) or through the email address [security@templafy.com](mailto:security@templafy.com).

Incidents that impact availability of the Templafy Services are monitored and detected using Azure Application Insights and Container Insights. These alerts trigger PagerDuty which calls to action the site reliability engineers. The on-call responder identifies the incident severity. Depending on the severity, roles are assigned including primary responder, subject matter experts and communication coordinator. All activity around the incident is captured through video recording, internal notes and Azure DevOps Issue for tracking. A blameless postmortem is scheduled within six business hours of the resolved incident, inviting all the people involved in identifying, solving, and communicating about the incident. An official Postmortem, approved by Product Owners or CTO is posted to [StatusPage](#) for external communication in a timely manner.



### *Data backup and recovery*

**Data backup:** For Templafy Services, tenant configuration data and binary data are backed up daily in SQL. In Templafy Hive, a 90-day Long-Term backup retention geo-redundant backup of SQL is available. Data in storage accounts are written to three disks for redundancy per site and replicated across multiple sites. The backup system automatically generates a backup log. A point-in-time restoration option is also enabled for up to 7 days, in which all changes can be restored with at most 10 minutes of data lost. Access to backup data is restricted only to authorized personnel using Azure AD with multi-factor authentication. Furthermore, all backups are encrypted using AES 256 encryption.

**Redundancy:** Templafy uses multi-site data centers with availability commitments to permit the resumption of Templafy Services in the event of a disaster or partial outage at its primary data center location. Templafy has a documented disaster recovery plan. This plan is reviewed and tested at least annually, and test results are reviewed by plan stakeholders. When necessary, plan documentation is updated.

**Business continuity and disaster recovery:** Templafy prioritizes the availability of the Templafy Services to its customers and plans for a variety of situations that may impact them. Templafy has established an organization-wide Business Continuity Policy that serves as a guideline for implementing uniform business continuity plans. Risk assessments are conducted to identify and assess business continuity risks across all office locations and Azure services. Protection measures are put into place to react to natural and human-made threats accordingly.

Templafy has created Disaster Recovery plans to cover all three general scenarios: malicious incidents (third-party or insider threat), accidental incidents (human error) and unavailability incidents (Azure outages that affects our product).

Templafy conducts testing of the business continuity and disaster recovery plans annually. Any issues identified during testing are resolved, and plans are updated accordingly. The business continuity plans are reviewed annually and updated, if necessary. Testing of plans include failing over a server and restoring of backups.

The business continuity plans cover the key personnel, resources and actions required to continue critical business processes and operations. Templafy performs an annual Business Impact Analysis (BIA) to identify the operational and financial impacts of any unplanned disruption to Templafy's business operations. The results of the BIA are integrated into the business continuity plans when relevant.

## *Physical security*

**Data center security:** No servers or computer facilities for the Templafy Services are hosted onsite. All physical access to facilities and environmental controls are controlled at the Cloud Service Provider (CSP) locations of Microsoft. Stringent physical and operational controls are in place and are accounted for by Microsoft's numerous ISO certifications and standard compliance, which are reviewed during the sub-processor annual evaluation by the information security team against Templafy's information security requirements, as described in the supplier management section.

**Office security:** Templafy maintains a physical and environment policy for its offices to ensure the security and integrity of Templafy's facilities and the assets located within. Templafy has physically sound buildings protected by appropriate security controls such as alarms, locks, reinforced windows, and emergency equipment. Keycard controlled locked access is in use and is timely removed as described in the logical security section. Visitors to secure areas are required to sign in and out with arrival and departure times, are required to wear an identification badge, and always escorted while in secure areas. Delivery and loading areas are managed and appropriately protected.

**Supplier management:** Templafy has established an organization-wide supplier risk management policy and standard to manage supplier relationships with a risk-based approach in line with the information security objectives. It covers key supplier lifecycle stages supplier onboarding, monitoring and offboarding. The policy outlines the controls that are implemented to ensure that suppliers live up to security and privacy requirements laid out by Templafy, and that this is appropriately managed by Templafy personnel involved in supplier relationships. The policy applies to all suppliers used by Templafy that have access to or process Templafy information, and thus must adhere to Templafy's information security requirements. This includes Templafy's sub-processors.

**Supplier assessments and monitoring:** All suppliers undergo a procurement assessment to identify the amount and severity of risks involved in the supplier relationship, as well as how critical the relationship is to the business at the procurement phase and are monitored thereafter at a frequency proportional to the calculated level of criticality and risk. More thorough assessments on security and privacy are conducted to ensure that suppliers meet the minimum information security requirements set out by Templafy. Depending on the supplier, assessments may be in the form of one or more of the following:

- Questionnaires filled out by the supplier, Templafy, or both. These are usually based on standard security framework e.g., ISO27001 and/or standard security questionnaires e.g., SIG, or custom-made by Templafy.
- Review of audit reports and/or certificates, e.g., ISO27001, SOC 2.
- Technical review meetings with the potential supplier.
- Reviewing further evidence such as suppliers' written policies or SOPs.
- Other means deemed applicable to the nature of the supplier relationship in question.

*Supplier agreements:* Templafy enters appropriate contractual agreements with suppliers. Depending on the supplier relationship, multiple agreements may be required, e.g., information security requirements, data privacy requirements, service level agreements, data processing agreements. All sub-processors have data processing agreements and are updated on a frequent basis subject to regulation changes. Templafy requires that suppliers sign a confidentiality and non-disclosure agreement prior to sharing confidential information.

## Information and communication

### *Internal communication*

Templafy communicates the information security program in various ways via security awareness training, town hall meetings, internal communications via email and messaging tools, policies and procedures uploaded to the Templafy's internal SharePoint site and verbally through daily interaction with the information security team.

### *External communication*

Customers can request meetings with security personnel during procurement and at any stage during customer use of Templafy Services. Upon request, customers can receive security documentation, including the latest penetration testing results, latest external audit reports such as ISO27001 and SOC 2.

Customers can report security incidents directly to [security@templafy.com](mailto:security@templafy.com). Customers can read the most recent general terms and conditions, service level agreements and data processing agreements on the Templafy website.

Communication with customers and partners can include their review of blog posts and knowledge base articles, as well as communication related to the resolution of submitted support cases on Templafy's ticketing system through the Templafy website.

## Monitoring

### *Internal audit*

Templafy has an internal audit function independent from control design and implementation periodically audits each area of Templafy's ISMS.

### *Legislative and contractual compliance*

Contractual and legislative requirements are registered, reviewed, updated, and compliance monitored on an ongoing basis.

### *Knowledge and research*

The Information Security team is responsible for keeping updated with changes in the cybersecurity and data protection threat landscape, through periodic research and contact with special interest groups, specialist security forums and professional associations.

#### Changes to the system during the period

There were no changes that are likely to affect report users' understanding of how Templafy provides the Templafy Services during the period 1 January, 2022 to 31 December, 2022.

#### Disclosure of incidents

There were no system incidents during the period 1 January, 2022 to 31 December, 2022 requiring disclosure that either:

- Were the result of controls failing; or,
- Resulted in a significant impairment to the achievement of systems requirements or service commitments to customers.

## Complementary user entity controls

Templafy Services are designed with the assumption that certain controls will be implemented by user entities.

#	Complementary user entity control
1	User entities are responsible for understanding and complying with their contractual obligations to Templafy.
2	User entities are responsible for monitoring and enforcing organizational compliance with Templafy's terms and agreements.
3	User entities are responsible for keeping the primary, service, security, billing and administrative contact information on file with Templafy updated.
4	User entities are responsible for immediately notifying Templafy of any actual or suspected information security breaches, including compromised user accounts, to security@templafy.com.
5	User entities are responsible for deploying releases of the Templafy Desktop MSI package without undue delay.
6	User entities are responsible for providing accurate and complete information and documentation regarding their own authentication method for authentication setup.
7	User entities are responsible for protecting established user IDs, passwords, and other credentials within their organizations, including appropriate safeguards for devices running Templafy applications.
8	User entities are responsible for maintaining their own signing certificate for SSO authentication methods and ensuring Templafy's technical operation teams receive updated certificate no later than three weeks before expiration.
9	User entities are responsible for reviewing their own access to Templafy periodically to validate the appropriateness of access levels, including any third party access they may have granted.
10	User entities are responsible for removing terminated or unwanted user accounts from the system either manually with the use of the deletion feature made available by Templafy or through SCIM in a timely manner.

- 13 User entities are responsible for ensuring the appropriateness of designated administrators and maintaining a low administrator count according to the principle of least privilege.
- 14 User entities are responsible for informing Templafy of changes to their infrastructure (e.g., network ports and proxy settings) or application environment (Office platform, OS platform, Desktop/Application Virtualization) in order to ensure the continued functioning and support of Templafy.

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*Figure 10 User entity responsibility*

## Complementary subservice organization controls

Templafy uses subservice organizations for data center hosting and infrastructure services in support of its document creation, collaboration and email signature system. Templafy runs on Microsoft Azure Platform-as-a-Service, which provides many enhanced features for security, availability and scalability out of the box. There are clear lines of responsibility, but often, there are also shared roles when it comes to responsibility regarding security in the cloud. Templafy conducts due diligence towards Microsoft Azure annually to monitor the outsourced operations. This is achieved by reviewing Microsoft's SOC 2 and other compliance reports, as well as having the necessary agreements in place.

Control activity expected to be implemented by subservice organization	Subservice organization	Applicable trust services
Physical access to the data center facility is restricted to authorized personnel.	Microsoft Azure	CC6.4, CC6.5
Physical security perimeters (e.g., fences, walls, barriers, guards, gates, electronic surveillance, physical authentication mechanisms, reception desks and security patrols) are implemented to safeguard sensitive data and information systems.	Microsoft Azure	CC6.2, CC6.3, CC6.4, CC6.5
The data center facility is monitored 24x7 by security personnel	Microsoft Azure	CC6.4, CC7.2
All production media is securely decommissioned and physically destroyed prior to leaving the data center.	Microsoft Azure	CC6.5
External vulnerability assessments are performed on a periodic basis, identified issues are investigated and tracked to resolution in a timely manner.	Microsoft Azure	CC7.1
Business continuity and disaster recovery procedures are developed, reviewed, and tested periodically.	Microsoft Azure	A1.3

Logical access to the underlying network and virtualization management software for the cloud architecture is appropriate.	Microsoft Azure	CC6.1, CC6.2, CC6.3, CC6.5, CC7.2
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*Figure 11 Subservice organization controls*