



Report on Eightfold AI Inc.'s Talent Intelligence Platform Relevant to Security, Availability, Confidentiality, and Privacy Throughout the Period October 1, 2022 to June 30, 2023

SOC 3® - SOC for Service Organizations: Trust Services Criteria for General Use Report



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Section 1

Independent Service Auditor's Report

Independent Service Auditor's Report

To: Eightfold AI Inc. ("Eightfold")

Scope

We have examined Eightfold's accompanying assertion titled "Assertion of Eightfold AI Inc. Management" (assertion) that the controls within Eightfold's Talent Intelligence Platform (system) were effective throughout the period October 1, 2022 to June 30, 2023, to provide reasonable assurance that Eightfold's service commitments and system requirements were achieved based on the trust services criteria relevant to security, availability, confidentiality, and privacy (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*).

The description of the boundaries of the system indicates that complementary user entity controls that are suitably designed and operating effectively are necessary, along with controls at Eightfold, to achieve Eightfold's service commitments and system requirements based on the applicable trust services criteria. Our examination did not include such complementary user entity controls and we have not evaluated the suitability of the design or operating effectiveness of such controls.

Eightfold uses a subservice organization to provide data center colocation services. The description of the boundaries of the system indicates that complementary subservice organization controls that are suitably designed and operating effectively are necessary, along with controls at Eightfold, to achieve Eightfold's service commitments and system requirements based on the applicable trust services criteria. The description of the boundaries of the system presents the types of complementary subservice organization controls assumed in the design of Eightfold's controls. Our examination did not include the services provided by the subservice organization, and we have not evaluated the suitability of the design or operating effectiveness of such complementary subservice organization controls.

Service Organization's Responsibilities

Eightfold 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 Eightfold's service commitments and system requirements were achieved. Eightfold has also provided the accompanying assertion about the effectiveness of controls within the system. When preparing its assertion, Eightfold is responsible for selecting, and identifying in its assertion, the applicable trust service 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 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. Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. 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. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

We are required to be independent and to meet our other ethical responsibilities in accordance with relevant ethical requirements relating to the engagement.

Our examination included:

- Obtaining an understanding of the system and the service organization's service commitments and system requirements.
- Assessing the risks that controls were not effective to achieve Eightfold'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 Eightfold'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 Eightfold's Talent Intelligence Platform were effective throughout the period October 1, 2022 to June 30, 2023, to provide reasonable assurance that Eightfold's service commitments and system requirements were achieved based on the applicable trust services criteria if complementary subservice organization controls and complementary user entity controls assumed in the design of Eightfold's controls operated effectively throughout that period is fairly stated, in all material respects.

Coalfire Controls LLC

Greenwood Village, Colorado
December 13, 2023

Section 2

Assertion of Eightfold AI Inc. Management



Assertion of Eightfold AI Inc. (“Eightfold”) Management

We are responsible for designing, implementing, operating and maintaining effective controls within Eightfold’s Talent Intelligence Platform (system) throughout the period October 1, 2022 to June 30, 2023, to provide reasonable assurance that Eightfold’s service commitments and system requirements were achieved based on the trust services criteria relevant to security, availability, confidentiality, and privacy (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 boundaries of the system is presented in attachment A and identifies the aspects of the system covered by our assertion.

The description of the boundaries of the system indicates that complementary user entity controls that are suitably designed and operating effectively are necessary, along with controls at Eightfold, to achieve Eightfold’s service commitments and system requirements based on the applicable trust services criteria.

Eightfold uses a subservice organization for data center colocation services. The description of the boundaries of the system indicates that complementary subservice organization controls that are suitably designed and operating effectively are necessary, along with controls at Eightfold, to achieve Eightfold’s service commitments and system requirements based on the applicable trust services criteria. The description of the boundaries of the system presents the types of complementary subservice organization controls assumed in the design of Eightfold’s controls. The description of the boundaries of the system does not disclose the actual controls at the subservice organization.

We have performed an evaluation of the effectiveness of the controls within the system throughout the period October 1, 2022 to June 30, 2023, to provide reasonable assurance that Eightfold’s service commitments and system requirements were achieved based on the applicable trust services criteria if complementary subservice organization controls and complementary user entity controls assumed in the design of Eightfold’s controls operated effectively throughout that period. Eightfold’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. The principal service commitments and system requirements related to the applicable trust services criteria are presented in attachment B.

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 October 1, 2022 to June 30, 2023 to provide reasonable assurance that Eightfold’s service commitments and system requirements were achieved based on the applicable trust services criteria.

Eightfold AI Inc.

Attachment A

Eightfold AI Inc.'s Description of the Boundaries of Its Talent Intelligence Platform

Type of Services Provided

Company Background

Eightfold AI Inc. (“Eightfold” or “the Company”) is a Santa Clara, CA-headquartered company leveraging artificial intelligence (AI) to re-imagine Human Resources (HR) processes. Eightfold believes that employment is the backbone of society and everyone deserves the right job. Eightfold has brought together machine learning (ML), AI, search, and relevancy specialists with experience building products at scale to solve employment and help others find the right career.

The Talent Intelligence Platform is a Software as a Services (SaaS) offering hosted in a third-party cloud service provider, built with AI technology. Eightfold increases the effectiveness of talent operations, so that recruiting and HR teams can reach their goals for recruitment, retention, diversity, and staff development. Eightfold offers one platform that increases the performance of talent operations company-wide, controls costs, and reduces the need for one-off tools.

The Talent Intelligence Platform delivers a secure, private talent network to each client, empowering enterprises to turn talent management into a competitive advantage. Eightfold clients can consider past applicants, current employees, and alumni, as well as recruits for any job opening. It enables clients to offer employees lateral transfer opportunities to prevent them from losing top performers.

The Talent Intelligence Platform allows for meaningful action in support of inclusion efforts. HR professionals can quickly build pipelines that meet company goals for diversity. Recruiters can mask personal details in candidate profiles to mitigate hiring bias. HR leaders can gain detailed metrics to report the impact of these actions.

Eightfold’s AI matches customer job criteria to candidates and matches candidates to jobs. Eightfold’s Personalized Career Site enables inbound applicants to locate the most appropriate open positions in seconds. Current employees can use Eightfold’s referral product to direct their referrals to appropriate open positions.

Industries served by Eightfold include, but are not limited to, financial services, transportation, telecommunications, logistics, healthcare, hospitality, retail, and technology, as well as educational institutions.

Description of Services Provided

Eightfold provides an HR SaaS platform to attract, recruit, and retain the workforce. The Talent Intelligence Platform supports various related modules that can stand alone or be used together based on the specific needs of the customer. The Talent Intelligence Platform, which includes the modules listed below, is the foundational layer of Eightfold applications. It integrates with existing HR and information technology (IT) systems (human resource information system [HRIS], applicant tracking system [ATS], learning management system [LMS], volunteer management system [VMS], email, single sign-on [SSO], and others) and leverages the enterprise talent data and outcomes through AI to derive insights and inform workflows across the talent lifecycle management. The Talent Intelligence Platform supports multiple languages, has the ability to configure role-based access across the organization, and supports various modules, including the following:

1. **Talent Acquisition** – Talent Acquisition is an Eightfold offering that provides a recruiting solution. Capabilities include personalized career site, diversity analytics, candidate masking, candidate relationship management, event recruiting, interview scheduling, and interview feedback.

2. **Talent Management** – Talent Management uses AI to guide employees to the next level in their careers. Talent Management identifies the skills, capabilities, career trajectory, and potential of employees and suggests potential roles or upskilling opportunities. Capabilities include Career Hub, talent marketplace, upskilling and reskilling, succession planning, internal mobility, and mentoring.
3. **Talent Flex** – Talent Flex is an AI-powered solution for HR and procurement organizations to efficiently manage high quality contingent workforces at scale. Talent Flex recommends contingent workers across available channels based on capabilities, availability, and budget.
4. **Workforce Exchange** – Workforce Exchange is an AI-powered career center that efficiently matches job seekers with employers at scale in support of public policies that accelerate the reemployment of citizens. Public sector and other non-profit organizations can utilize Workforce Exchange to offer employment matching services to their constituencies.
5. **Resource Management** – Resource Management helps match skills to projects and engagements, allowing employers to see the skills across their talent pool to better match people to projects and engagements.

The Talent Intelligence Platform is categorized by the National Institute of Standards and Technology (NIST) as HR Strategy, Staff Acquisitions, and HR Development. The Talent Intelligence Platform processes and stores typical personally identifiable information (PII) encountered in talent processes (for example, first name, last name, email address, phone number, job history, education history) on behalf of clients. The Talent Intelligence Platform is delivered through the web browser and through mobile applications and relies on HTTPS and transport layer security (TLS) between Eightfold and the end user's browser or device.

Refer to the Principal Service Commitments and System Requirements in Attachment B for details around the practices in place to meet applicable laws and regulations related to the security of PII.

The description of the boundaries of the system in this section of the report details the Talent Intelligence Platform. Any other Company services are not within the scope of this report. The accompanying description includes only the policies, procedures, and control activities at the Company and does not include the policies, procedures, and control activities at any subservice organizations (see below for further discussion of the subservice organization).

The Components of the System Used to Provide the Services

The boundaries of the Talent Intelligence Platform are the specific aspects of the Company's infrastructure, software, people, procedures, and data necessary to provide its services and that directly support the services provided to customers. Any infrastructure, software, people, procedures, and data that indirectly support the services provided to customers are not included within the boundaries of the Talent Intelligence Platform.

The components that directly support the services provided to customers are described in the subsections below.

Infrastructure

The Company utilizes a third-party cloud service provider to provide the resources to host the Talent Intelligence Platform. The Company leverages the experience and resources of the third-party cloud service provider to scale quickly and securely as necessary to meet current and future demand. However, the Company is responsible for designing and configuring the Talent Intelligence Platform architecture within the third-party cloud host provider to ensure the availability, security, and resiliency requirements are met.

The in-scope hosted infrastructure also consists of multiple supporting tools, as shown in the following business functions:

Infrastructure	
Production Tool	Business Function
Private Cloud	Isolated cloud resources
Web Servers	Delivers primary web application to customers
Web Application Firewall (WAF)	Filters incoming web traffic, rate limits bad traffic, blocks bots
Automated Deployment	Launches an environment and creates and configures the third-party cloud service provider resources needed to run the application
Load Balancer	Balances traffic between web servers running in three different availability zones
Networking and Firewalls	Blocks incoming traffic, provides interconnectivity between various servers and services, and divides the network into subnets
Elastic Cache	Ephemeral storage of data to improve latency
Object Storage	Resumes files and other objects and logs
Virtual Private Network (VPN)	Protects and restricts internet-based access to infrastructure
Content Delivery Network (CDN)	Static web assets
Primary Database	Stores candidate, position, and other data
Analytics Database	Stores inferred candidate, position, and application data. Stores logs, users, and system events
Data Streaming	Extract, transform, and load (ETL) service that reliably captures, transforms, and delivers streaming data to data lakes, data stores, and analytics services
Reporting	Business analytics service
Push Notifications	Pub/sub, short messaging service (SMS), email, and mobile push notifications
File Transfers	Manages and shares data with simple, secure, and scalable file transfers

Infrastructure	
Production Tool	Business Function
Infrastructure as Code	Creates and manages resources with templates
Processor Workers	Carries out batch jobs
Queue	Maintains a queue of batch jobs
Email	Inbound and outbound email
Analytics	Interactive query service for cloud storage
Domain Name System (DNS) Services	DNS services
Key Management	Key management services
Secrets Management	Customer secrets storage
Identity and Access Management	Identity and access management
Apache Airflow	Runs scheduled jobs
Apache Solr	Full text and faceted searches of candidates, position, and course data
Apache Spark	In-memory processing and query execution
TensorFlow	ML pipeline

Software

Software consists of the programs and software that support the Talent Intelligence Platform (operating systems [OSs], middleware, and utilities). The list of business functions performed by the software and ancillary software used to build, support, secure, maintain, and monitor the Talent Intelligence Platform, are detailed in the following listing:

- Application monitoring, security information and event management (SIEM), logging system, infrastructure monitoring
- Application monitoring, SIEM, logging system, infrastructure monitoring
- Backup and replication
- Configuration management and health
- Configuration management and health
- Patch management
- Antivirus
- Intrusion (anomaly) detection
- Distributed Denial of Service (DDoS) protection
- Alert notifications
- Customer support ticketing and issue resolution

- Vulnerability detection
- Code repository, software vulnerability alerts
- Code repository, software vulnerability alerts
- SMS and messaging integration
- Online product training for customers' users
- Parses resumes for processing
- Parses resumes for processing
- Customer support calls
- Product ticketing and issue and task resolution

People

The Company develops, manages, and secures the Talent Intelligence Platform via separate departments. The responsibilities of these departments are generally described in the following table:

People	
Group/Role Name	Function
Executive Management	Responsible for overseeing company-wide activities, establishing and accomplishing goals, and managing objectives.
Engineering	Responsible for the development, testing, deployment, and maintenance of new code and supporting customer success, as well as support and professional services teams for the Talent Intelligence Platform.
Enablement Operations	Responsible for managing access controls and the security of the production environment.
Legal	Responsible for providing legal counsel, oversight, and development of service terms, customer terms negotiation, and vendor agreement review and negotiation.
Governance, Risk, and Compliance (GRC)	Responsible for determining security, data protection, and compliance (SDPC) requirements and management of the overall Eightfold GRC program.
Product Management	Responsible for overseeing the product life cycle, including adding new product functionality.
Solutions Architecture	Responsible for performing onboarding of customers.
HR	Responsible for onboarding new personnel, defining the roles and positions of new hires, performing background checks, and facilitating the employee termination process.
Chief Revenue Officer	Member of the executive management team. Responsible for the revenue teams.
Customer Success	Responsible for performing ongoing technical account management.

People	
Group/Role Name	Function
Support	Responsible for providing direct support to customers in triaging, reproducing, and resolving technical issues encountered when using the service.
Professional Services	Responsible for providing support for customization of customer solutions.

Procedures

Procedures include the automated and manual procedures involved in the operation of the Talent Intelligence Platform. Procedures are developed and documented by the respective teams for a variety of processes, including those relating to product management, engineering, technical operations, security, IT, and HR. These procedures are drafted in alignment with the overall information security policies and are updated and approved as necessary for changes in the business, but no less than annually.

The following table details the procedures as they relate to the operation of the Talent Intelligence Platform:

Procedures	
Procedure	Description
Logical Access	How the Company restricts logical access, provides and removes that access, and prevents unauthorized access.
System Operations	How the Company manages the operation of the system and detects and mitigates processing deviations, including logical and physical security deviations.
Change Management	How the Company identifies the need for changes, makes the changes using a controlled change management process, and prevents unauthorized changes from being made.
Risk Assessment and Mitigation	How the Company identifies, selects, and develops risk mitigation activities arising from potential business disruptions and the use of vendors and business partners.
Incident Response and Security Incident Response	How the Company identifies, responds to, and moves through the process of addressing incidents as they occur, based on the severity of the incident. This includes addressing forensic and communication processes necessary in the event that an incident is related to security.
Backup Management	How the Company identifies organizational requirements for backups, including backup strategy, frequency, retention, and protection.
Business Continuity Management	How the Company assures the capability of the organization to continue to deliver the service at predefined levels that are acceptable to customers in the event of a disruptive incident and that outline the steps required, defined roles and responsibilities, and expected outcomes of implementing the business continuity strategy.
Disaster Recovery	How the Company performs disaster recovery operations, including failover to secondary region data center-hosting locations.

Procedures	
Procedure	Description
Capacity Management	How the Company performs capacity planning, forecasting, monitoring, and corrective actions for Eightfold customer-facing services.
Data Deletion and Retention	How the Company outlines various data retention periods, based on legal, regulatory, and business requirements.
Password Protection	How the Company establishes a standard for the creation of strong passwords and the protection of those passwords.
Logging and Monitoring	How the Company defines what will be logged for security and privacy purposes, how and where it will be stored, and what automated and manual processes may be used to review and monitor the logs.
Vulnerability Management	How the Company manages the security practice designed to proactively prevent exploitation of IT vulnerabilities that exist within systems to reduce or eliminate the potential for exploitation.
Identity and Access Management	How the Company describes the security requirements necessary to manage user access to Eightfold systems and resources.
Media Disposal and Deletion	How the Company manages retrieval, disposal, and deletion of media.
Software Development Lifecycle	How the Company ensures that compliance, security, and privacy requirements are adhered to while improving overall cost effectiveness of development for all aspects of development ranging from software developer training through traditional software lifecycle phases, including requirements, design, implementation, and release.
Issue and Exception Management	How the Company provides a mechanism by which the GRC team and other stakeholders will address issues related to the Eightfold environment and describes the process Eightfold services utilize to manage and track exceptions to policies, standards, or defined operating procedures.
Document and Records Management	How the Company addresses the controls to manage documentation and records managed by the GRC team.
GRC Policy and Standards Review	How the Company establishes the framework for the review, modification, and approval of the Eightfold security and data protection policies and supporting standards.
Data Protection	How the Company provides a foundation for Eightfold data privacy by design principle and its overall data protection guidelines and the program through which Eightfold protects personal data.
Asset Classification and Protection	How the Company describes the scheme by which Eightfold classifies and protects its assets and the corresponding labeling and handling requirements for each classification level.
Breach Notification	How the Company evaluates a security incident in which the Incident Response team has determined that there may be data involved that may necessitate a breach notification.

Procedures	
Procedure	Description
Vendor Risk Management	How the Company maintains a corporate vendor management program to ensure that the security and data protection measures Eightfold implements are also extended to the ecosystem of suppliers with which Eightfold works.
Internal Audit	How the Company schedules and oversees the internal information security and data protection program audits performed by independent parties engaged by management to evaluate the effectiveness of the program's implementation, maintenance, expectations, and conformity to ISO/IEC 27001:2013, ISO/IEC 27701:2019, and SOC 2/3.
Encryption and Key Management	How the Company provides the basis to determine which cryptographic controls are necessary and appropriate to safeguard Eightfold resources and systems, including data, and describes the technologies with which Eightfold encrypts and protects its own and its customers' assets and the corresponding management, use, and storage requirements for cryptographic elements.
Communications	How the Company describes its communications strategy, including employees, contractors, consultants, and all third parties (vendors, customers, and prospects) and routine notifications, ad hoc reporting, and training.

Data

Data refers to transaction streams, files, data stores, tables, and output used or processed by the Company. Through the application programming interface (API), the customer or end user defines and controls the data they load into and store in the Talent Intelligence Platform production network. Once stored in the environment, the data is accessed remotely from customer systems via the Internet.

Customer data is managed, processed, and stored in accordance with relevant data protection and other regulations and with specific requirements formally established in customer contracts.

The Company has deployed secure methods and protocols for the transmission of confidential or sensitive information over public networks. Eightfold provides encryption in transit for all service communications within its VPC. Encryption at rest is enabled for databases (at the database level) and storage housing sensitive customer data. For an additional cost, customers may manage and bring their own encryption keys to be used for encryption at rest in lieu of Eightfold management of these keys.

Eightfold's primary data consists of candidate, position, and related data uploaded by job candidates, both external and internal to the Company, into the customers' database. Other primary data is provided to Eightfold's systems via customer integrations, including ATS, HRIS, and other systems, which are considered the source of truth for applicant, employee, and job requirements and descriptions data. This information is stored in the primary database.

Candidate, position, and application data is stored in the analytics database for analytics. This database also stores application and system event logs.

Resume files and other objects are stored in cloud storage. Servers maintain a copy of the candidate, position, and course data and provide full text and faceted search services.

User interaction with the platform takes place through the web server, which renders information and presents it to users. A server provides ephemeral storage of data to improve latency. A content delivery network is used to reduce global latency for rendering static data.

Web servers can queue jobs in processor worker servers using a messaging queue. This allows for batch processing of information. The workers interact with databases and object stores.

The following table details the types of data contained in the production application for the Talent Intelligence Platform:

Data	
Production Application	Description
Talent Intelligence Platform	The Company keeps track of user activity in relation to the types of services customers and their users use, the configuration of their browsers, and performance metrics related to their use of the services.
Talent Intelligence Platform	The Company logs information about customers and their users, including Internet Protocol (IP) address. Log files are immutable records of computer events about an OS, application, or user activity, which form an audit trail. These records may be used to assist in detecting security violations, performance problems, and flaws in applications.
Talent Intelligence Platform	Client data such as: <ul style="list-style-type: none"> • First name • Last name • Email address • Phone number • Job history • Education history Job description
Talent Intelligence Platform	Exports and reports provided to customers such as: <ul style="list-style-type: none"> • Applicant information • Applicant resume • Applicant job profile • Diversity hiring statistics • Internal mobility statistics • Usage adoption analytics Skill analyses

Subservice Organization

The Company uses a subservice organization for data center colocation services. The Company's controls related to the Talent Intelligence Platform cover only a portion of the overall internal control for each user entity of the Talent Intelligence Platform. The description does not extend to the colocation services for IT infrastructure provided by the subservice organization.

Although the subservice organization has been carved out for the purposes of this report, certain service commitments, system requirements, and applicable criteria are intended to be met by controls at the subservice organization. Controls are expected to be in place at the subservice organization related to

physical security and environmental protection, as well as backup, recovery, and redundancy controls related to availability. The subservice organization's physical security controls should mitigate the risk of unauthorized access to the hosting facilities. The subservice organization's environmental protection controls should mitigate the risk of fires, power loss, climate, and temperature variabilities.

Company management receives and reviews the subservice organization's SOC 2 report annually. In addition, through its operational activities, Company management monitors the services performed by the subservice organization to determine whether operations and controls expected to be implemented are functioning effectively. Management also communicates with the subservice organization to monitor compliance with the service agreement, stay informed of changes planned at the hosting facility, and relay any issues or concerns to management of the subservice organization.

Attachment B

Principal Service Commitments and System Requirements

Principal Service Commitments and System Requirements

Commitments are declarations made by management to customers regarding the performance of the Talent Intelligence Platform. Commitments are communicated in written individualized agreements and standardized contracts, including the Eightfold Master Subscription Agreement (MSA), service-level agreements, sales orders, statements of work, and the privacy policy.

System requirements are specifications regarding how the Talent Intelligence Platform should function to meet the Company’s principal commitments to user entities. System requirements are specified in the Company’s policies and procedures.

The Company’s principal service commitments and system requirements related to the Talent Intelligence Platform include the following:

Trust Services Category	Service Commitments	System Requirements
<p>Security</p>	<ul style="list-style-type: none"> • Eightfold has implemented technical access controls that restrict access to personal information it processes to duly authorized persons only, who are permitted to access personal information only to the extent necessary for the performance of their duties. • Eightfold will protect data at rest and in transit. • Eightfold will maintain a security program that is designed to (i) ensure the security and integrity of customer data; (ii) protect against threats or hazards to the security or integrity of customer data; and (iii) prevent unauthorized access to customer data. • Eightfold has implemented a written information security policy that mandates the use of appropriate technical and organizational security measures in Eightfold’s organization to protect personal information against unauthorized and unlawful processing and against accidental loss, damage, or destruction, as well as appropriate measures in the event of an actual or suspected data or security breach. 	<ul style="list-style-type: none"> • Logical access standards • Physical access standards • Employee provisioning and deprovisioning standards • Access review standards • Encryption standards • Information security standards • Intrusion detection standards
<p>Availability</p>	<ul style="list-style-type: none"> • Eightfold will provide support for the subscription services to the customer in accordance with Eightfold’s then-current support level, as identified in the applicable order form or agreement. • Services will be available at least 99.5% of the time, calculated monthly, excluding circumstances such as unavailability due to external services, general internet services or power failures, failure of the customer’s equipment or software programs not provided by Eightfold, acts of God or causes beyond Eightfold’s reasonable control, and planned downtime and latency in certain features such as search or uploads. 	<ul style="list-style-type: none"> • Backup management standards • Business continuity management standards

Trust Services Category	Service Commitments	System Requirements
	<ul style="list-style-type: none"> • Eightfold has taken and will continue to take regular back-ups of the PII that it processes on behalf of the data exporter. • Eightfold has implemented appropriate disaster recovery and business continuity plans designed to ensure the availability, security, integrity, and (where necessary) restoration of the personal data on the occurrence of a business interruption event. 	
Confidentiality	<ul style="list-style-type: none"> • Eightfold will safeguard customer data from unauthorized use, access, or disclosure using no less than a reasonable degree of care. • Eightfold will use customer data solely for the purpose of delivering the services and will not disclose it to any third party except to its affiliates or contractors who need to know such information for such purpose (and in the case of Eightfold, to its third-party service providers for necessary performance of the services). • Upon termination of services, Eightfold will make all Customer Data available for retrieval for a period of days set forth in applicable agreements upon customer request or will delete all Customer Data thereafter. 	<ul style="list-style-type: none"> • Data deletion and retention standards • Data classification standards • Data protection standards • Internal confidentiality standards
Privacy	<ul style="list-style-type: none"> • Eightfold agrees to comply with all applicable privacy laws and regulations in providing the services to customers. • Eightfold will not use or disclose personal data for any reason, other than those described in the privacy policy and relevant agreements. 	<ul style="list-style-type: none"> • Sensitive data handling standards • Privacy standards