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Eightfold AI Inc.
Type 2 SOC 3
2021

eightfold.ai

SOC 3 FOR SERVICE ORGANIZATIONS REPORT

July 1, 2020 to June 30, 2021

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SECTION 1

ASSERTION OF EIGHTFOLD AI INC. MANAGEMENT

ASSERTION OF EIGHTFOLD AI INC. MANAGEMENT

July 12, 2021

We are responsible for designing, implementing, operating, and maintaining effective controls within Eightfold AI Inc.'s ('Eightfold AI', or 'the Company') Talent Intelligence Platform Services System throughout the period July 1, 2020 to June 30, 2021, to provide reasonable assurance that Eightfold AI's service commitments and system requirements relevant to Security, Availability, Confidentiality, and Privacy (applicable trust services criteria) were achieved. Our description of the boundaries of the system is presented below in "Eightfold AI Inc.'s Description of Its Talent Intelligence Platform Services System throughout the period July 1, 2020 to June 30, 2021" and identifies the aspects of the system covered by our assertion.

We have performed an evaluation of the effectiveness of the controls within the system throughout the period July 1, 2020 to June 30, 2021, to provide reasonable assurance that Eightfold AI'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*) and Eightfold AI's compliance with the commitments in its privacy notice throughout the period July 1, 2020 to June 30, 2021. Eightfold AI's objectives for the system in applying 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 "Eightfold AI Inc.'s Description of Its Talent Intelligence Platform Services System throughout the period July 1, 2020 to June 30, 2021".

Eightfold AI uses Amazon Web Services, Inc. ('AWS') to provide cloud hosting services. The description indicates that complementary subservice organization controls that are suitably designed and operating effectively are necessary, along with controls at Eightfold AI, to achieve Eightfold AI's service commitments and system requirements based on the applicable trust services criteria and Eightfold AI's compliance with the commitments in its privacy notice. The description presents Eightfold AI's controls, the applicable trust services criteria, and the types of complementary subservice organization controls assumed in the design of Eightfold AI's controls. The description does not disclose the actual controls at the subservice organization.

The description indicates that complementary user entity controls that are suitably designed and operating effectively are necessary to achieve Eightfold AI's service commitments and system requirements based on the applicable trust services criteria and Eightfold AI's compliance with the commitments in its privacy notice. The description presents the applicable trust services criteria and the complementary user entity controls assumed in the design of Eightfold AI's controls.

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 July 1, 2020 to June 30, 2021 to provide reasonable assurance that Eightfold AI's service commitments and system requirements were achieved based on the applicable trust services criteria.

Kamal Ahluwalia
President
Eightfold AI Inc.

SECTION 2

INDEPENDENT SERVICE AUDITOR'S REPORT

INDEPENDENT SERVICE AUDITOR'S REPORT

To Eightfold AI Inc.:

Subject

We have examined Eightfold AI's accompanying description of Talent Intelligence Platform Services System titled "Eightfold AI Inc.'s Description of Its Talent Intelligence Platform Services System throughout the period July 1, 2020 to June 30, 2021" (description) based on the criteria for a description of a service organization's system in DC section 200, *2018 Description Criteria for a Description of a Service Organization's System in a SOC 2® Report* (AICPA, *Description Criteria*), (description criteria) and the suitability of the design and operating effectiveness of controls stated in the description throughout the period July 1, 2020 to June 30, 2021, to provide reasonable assurance that Eightfold AI'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*) and Eightfold AI's compliance with the commitments in its privacy notice throughout the period July 1, 2020 to June 30, 2021.

Eightfold AI uses AWS to provide cloud hosting services. The description indicates that complementary subservice organization controls that are suitably designed and operating effectively are necessary, along with controls at Eightfold AI, to achieve Eightfold AI's service commitments and system requirements based on the applicable trust services criteria and Eightfold AI's compliance with the commitments in its privacy notice. The description presents Eightfold AI's controls, the applicable trust services criteria, and the types of complementary subservice organization controls assumed in the design of Eightfold AI's controls. The description does not disclose the actual controls at the subservice organization. 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.

The description indicates that complementary user entity controls that are suitably designed and operating effectively are necessary, along with controls at Eightfold AI, to achieve Eightfold AI's service commitments and system requirements based on the applicable trust services criteria and Eightfold AI's compliance with the commitments in its privacy notice. The description presents Eightfold AI's controls, the applicable trust services criteria, and the complementary user entity controls assumed in the design of Eightfold AI's controls. 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.

Service Organization's Responsibilities

Eightfold AI 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 AI's service commitments and system requirements were achieved. Eightfold AI has provided the accompanying assertion titled "Assertion of Eightfold AI Inc. Management" (assertion) about the description and the suitability of design and operating effectiveness of controls stated therein. Eightfold AI is also responsible for preparing the description and assertion, including the completeness, accuracy, and method of presentation of the description and assertion; providing the services covered by the description; selecting the applicable trust services criteria and stating the related controls in the description; and identifying the risks that threaten the achievement of the service organization's service commitments and system requirements and complying with the commitments in its privacy notice.

Service Auditor's Responsibilities

Our responsibility is to express an opinion on the description and on the suitability of design and operating effectiveness of controls stated in the description based on our examination. 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, in all material respects, the description is presented in accordance with the description criteria and the controls stated therein were suitably designed and operated effectively to provide reasonable assurance that the service organization's service commitments and system requirements were achieved based on the applicable trust services criteria and its compliance with the commitments in its privacy notice. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

An examination of the description of a service organization's system and the suitability of the design and operating effectiveness of controls involves the following:
- Obtaining an understanding of the system and the service organization's service commitments and system requirements
- Assessing the risks that the description is not presented in accordance with the description criteria and that controls were not suitably designed or did not operate effectively
- Performing procedures to obtain evidence about whether the description is presented in accordance with the description criteria
- Performing procedures to obtain evidence about whether controls stated in the description were suitably designed to provide reasonable assurance that the service organization achieved its service commitments and system requirements based on the applicable trust services criteria and its compliance with the commitments in its privacy notice
- Testing the operating effectiveness of controls stated in the description to provide reasonable assurance that the service organization achieved its service commitments and system requirements based on the applicable trust services criteria and its compliance with the commitments in its privacy notice
- Evaluating the overall presentation of the description

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

Inherent Limitations

The description is prepared to meet the common needs of a broad range of report users and may not, therefore, include every aspect of the system that individual users may consider important to meet their informational needs.

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 are achieved based on the applicable trust services criteria. Also, the projection to the future of any conclusions about the suitability of the design and operating 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 AI's Talent Intelligence Platform Services System were suitably designed and operating effectively throughout the period July 1, 2020 to June 30, 2021, to provide reasonable assurance that Eightfold AI's service commitments and system requirements were achieved based on the applicable trust services criteria is fairly stated, in all material respects.

The SOC logo for Service Organizations on Eightfold AI's website constitutes a symbolic representation of the contents of this report and is not intended, nor should it be construed, to provide any additional assurance.

Restricted Use

This report, is intended solely for the information and use of Eightfold AI, user entities of Eightfold AI's Talent Intelligence Platform Services during some or all of the period July 1, 2020 to June 30, 2021, business partners of Eightfold AI subject to risks arising from interactions with the Talent Intelligence Platform Services, and those who have sufficient knowledge and understanding of the complementary user entity controls and complementary subservice organization controls and how those controls interact with the controls at the service organization to achieve the service organization's service commitments and system requirements.

This report is not intended to be, and should not be, used by anyone other than these specified parties.

A-LIGN ASSURANCE

Tampa, Florida
July 12, 2021

SECTION 3

**EIGHTFOLD AI INC.'S DESCRIPTION OF ITS TALENT INTELLIGENCE
PLATFORM SERVICES SYSTEM THROUGHOUT THE PERIOD
JULY 1, 2020 TO JUNE 30, 2021**

OVERVIEW OF OPERATIONS

Company Background

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

Eightfold AI delivers the Talent Intelligence Platform, the most effective way for private and public sector organizations to retain top performers, upskill and reskill the workforce, recruit top talent efficiently, and reach diversity goals.

Eightfold's platform leverages an underlying global data set to fully understand the availability, maturity, relevance, learnability and evolution of skills in the global market. This allows leading organizations to be specific with their upskilling and reskilling programs and offer a personalized experience to employees, generating better returns from their existing HR investments. Additionally, the platform helps employers understand the workforce's skills and capabilities to accelerate internal mobility, and helps hiring companies find matches quickly and onboard new employees and contingent workers.

Furthermore, 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 use Eightfold's referral product to direct their referrals to appropriate open positions, leading to more successful hires from referrals.

Industries served by Eightfold AI include, but are not limited to, Financial Services, Transportation, Telecommunications, Logistics, Healthcare, Hospitality, Retail, Educational Institutions, Technology, and Public Sector.

Description of Services Provided

Eightfold AI provides an HR SaaS platform to attract, recruit, and retain the workforce. Eightfold's application, the Talent Intelligence Platform, can integrate with most applicant tracking systems (ATS) or HR Information Systems (HRIS).

The Talent Intelligence Platform supports various related modules that can stand alone or be used together based on the specific needs of the Customer:

1. Talent Acquisition - Talent Acquisition is an Eightfold AI offering that provides a recruiting solution covering all processes from requisition to offer.
2. Talent Management - Talent Management uses AI to guide employees to what's next in their careers. Talent Management surfaces the skills, capabilities, career trajectory, and potential of employees and suggests potential roles or upskilling opportunities based on the unique profile of each employee.
3. Talent Flex - Eightfold AI Talent Flex is an AI-powered solution for HR and procurement organizations to efficiently source and manage high quality contingent workforces at scale.
4. Workforce Exchange - The Eightfold AI Workforce Exchange AI-powered career center 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.

Principal Service Commitments and System Requirements

The Talent Intelligence Platform is categorized by 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 (e.g., first name, last name, e-mail address, phone number, job history, education history) on behalf of their clients. The Eightfold AI application is delivered through the web browser and/or through mobile applications and relies on Hypertext Transfer Protocol Secure (HTTPS) and Transport Layer Security (TLS) 1.2 between Eightfold AI and the end user.

Eightfold AI has implemented technical and administrative safeguards to protect Customer Data against security incidents, which includes but is not limited to the following security measures:

- Information security policy: Eightfold AI 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 Data against unauthorized and unlawful processing and against accidental loss, damage, or destruction as well as appropriate steps in the event of an actual or suspected data or security breach
- Security Function: Eightfold AI has designated a security committee tasked with responsibility for the development, implementation, and maintenance of the Eightfold's information security practice
- Physical security: Eightfold's Servers hosting Customer Data are secured in AWS. Refer to https://aws.amazon.com/compliance/data-center/controls for details
- Logical security: Eightfold AI supports and recommends customers' use of Single Sign-On (SSO) and
  multi-factor authentication (MFA). To the extent that customers use customized login for its Eightfold AI instance, Eightfold AI saves a secure hash of the password, not the password itself
- Network security: Eightfold AI relies on AWS network protection features to protect Personal Data and safeguard it from threats. Eightfold AI also conducts independent third-party penetration tests and periodic assessment of security setup
- Encryption: Eightfold AI encrypts data at rest and in transit. Eightfold AI uses secure protocols to connect with the Customer's ATS or Human Resources Management System (HRMS) application programming interface (API) and uses HTTPS by default for Internet traffic
- Access controls: Eightfold AI has implemented technical access controls that restrict access to Personal Data it processes to duly authorized employees and contractors only. Duly authorized employees and contractors are permitted to access Personal Data only to the extent necessary for the performance of their duties. Eightfold AI has appointed a system administrator with overall responsibility for granting, changing, or voiding data access privileges to its data processing systems
- Usernames and passwords: Access to Personal Data is controlled through access privileges (described above), usernames, and confidential passwords. No two employees or contractors may share or use the same username. Employees and contractors will be required to follow the minimum character and complexity requirement
- Backups: Eightfold AI has taken and will continue to take regular, at least weekly, backups of the Personal Data that it processes on behalf of the data exporter. Data backups are stored securely at a different geographical location and will be available for data restoration in the event of catastrophic system failure and non-catastrophic system failure or user error
- Disaster recovery and business continuity: Eightfold AI has implemented appropriate disaster recovery and business continuity plans that ensure the availability, security, integrity, and (where necessary) restoration of the Personal Data on the occurrence of a business interruption event
- Audit: Eightfold AI will audit its compliance with its information security policy on a regular basis and at least once annually. Remedial measures identified as necessary following an audit will be fully and promptly implemented
- Secure Disposal: Eightfold AI has implemented policies and procedures regarding the disposal of Personal Data and tangible property containing Personal Data, taking into account available technology so that Personal Data cannot be practically read or reconstructed

Components of the System

Infrastructure

Eightfold's Talent Intelligence Platform Services System uses AWS' infrastructure to provide its SaaS services. Among the infrastructure components are:
- Web servers
- Web application firewall (WAF)
- Load Balancer
- Networking and Firewall
- Cache
- Object Storage
- Virtual Private Network (VPN)

Software

The primary software used to provide Eightfold's Talent Intelligence Platform Services System includes but are not limited to the database and AWS EC2.

People

Eightfold AI has employees and contractors located throughout the world; the breakdown of functional areas includes, but is not limited to:
- Executive Management
- Legal, Security, Privacy and Trust
- Sales
- Marketing
- Engineering
- Product
- Professional Services

Data

Eightfold's data storage includes candidate, position, and related data uploaded by their users into their database. Inferred candidate, position, and application data is stored in the database and presented to customers using the web interface. Resume files and other objects are stored in AWS.

User interaction with the system takes place through the webserver, which renders information and presents it to users.

Privacy Commitments

The Talent Intelligence Platform is categorized by National Institute of Standards and Technology (NIST) as HR Strategy, Staff Acquisitions, and HR Development. The Talent Intelligence Platform processes and stores typical PII encountered in talent processes including for example (first name, last name, e-mail address, phone number, job history, education history) on behalf of clients. The Eightfold AI application is delivered through the web browser and/or through mobile applications and relies on HTTPS and TLS 1.2 between Eightfold AI and the end user's browser/device.

Eightfold AI Privacy Policy

Eightfold's Privacy Policy is hosted online at https://Eightfold AI/privacy-policy/.

Processes, Policies and Procedures

Formal IT policies and procedures describe physical security, logical access, computer operations, change control, and data communication standards. Teams are expected to adhere to the Eightfold AI policies and procedures that define how services should be delivered. These are located on the Company's intranet and can be accessed by any Eightfold AI team member.

Physical and Environmental Security

Eightfold's entire infrastructure is hosted on AWS. Physical and environmental security for the systems is the responsibility of AWS. Please see the "Subservice Organizations" section below for a detailed listing of controls owned by AWS.

Logical Access

Eightfold AI utilizes Role-Based Access Control (RBAC), whereby defined roles are identified and categorized accordingly in systems to which employees have access. Employees are only given the access needed to perform their roles and responsibilities, as this helps ensure the safety and security of Eightfold AI systems. Additionally, only authorized users can access Eightfold AI systems, and terminated users are removed from company-wide access reasonably.

Eightfold's user identity, provisioning, and access rights lifecycle is a series of administrative, operational, and technical activities. Related procedures are adopted, implemented, and undertaken for creating identities (identification), authenticating to system resources (authentication), assigning users certain access rights (authorization), and employing effective segregation of duties, while also undertaking various auditing, monitoring, logging, and reporting functions (accounting) for a given entity's distributed information systems environment. Furthermore, the user identity, provisioning, and access rights lifecycle management process should always strive to advocate security, scalability, and flexibility, along with the continued adoption of emerging technologies to meet its needs.

Eightfold AI provides role-based access to the infrastructure to engineering personnel using AWS. Login is protected through a complex password and MFA. Access is granted based on the role of the individual. VPN access requires authorization from the concerned engineering manager, a complex password, and MFA.

Eightfold AI system administrators are informed when employees requiring access to the system join, are terminated, or their role within the organization changes. Annual reviews are done of the access rights granted to each role and individual.

The Eightfold AI Admins monitor the system using a combination of chosen technologies and tools.

Computer Operations - Backups

Eightfold AI has in place data backup policies, procedures, and supporting processes for ensuring environments are backed up in a timely, accurate, and complete manner. Furthermore, any incidents relating to backups (e.g., backup failures) are corrected immediately to ensure the integrity of the data. Backups are performed in an automated manner using the AWS backup mechanisms. AWS stores the backups redundantly. If a backup fails, a notification is sent out, and admin personnel attend to the notification, assess the root cause, fix the issue, and create another backup.

Computer Operations - Availability

Eightfold AI uses tools and technologies to monitor infrastructure for issues continually. Procedures are in place to act upon, report, and respond to any issues. Eightfold's infrastructure is designed to use the elastic features of AWS. Systems automatically scale up and down as per need.

Eightfold AI has a patch management system that performs patching and reboots; where applicable, this system also enforces policy. The system sends a report at the end of its completion, and this report is monitored by personnel.

Business continuity and disaster recovery plans are developed, updated, and tested annually.

Change Control

Eightfold AI utilizes a formalized change management process, for which policies, procedures, and related change functions are effectively documented accordingly.

Changes are requested and tracked using a ticketing system. When applicable, major changes undergo design reviews before they can be developed or tested. Code and configuration are stored using the version control system. Before the change is released to production, it is tested in the non-production environment by the release engineer, using a test protocol that the engineer provides as part of the code change. Eightfold AI uses many different automated tests within their build system. A peer approves changes in a review system before the change can be committed to the master branch. Additionally, software is in place to ensure only authorized changes are deployed into the production environment.

The release process follows standard policies and procedures. Releases can be rolled back quickly in case it is found to contain an error. Any release leads to the related production containers being replaced.

Data Communications

End users are only allowed to access a system through AWS WAF and Load Balancer (LB). The LB balances the load between web server containers in the independent availability zones and subnets within the AWS region. Similar redundancy is built into databases and other components of the system.

Penetration testing is performed through a third-party vendor. Vulnerability scans, web application scans, and (where applicable) database and policy scans are performed.

VPN access to the Talent Intelligence Platform infrastructure is required for authorized Eightfold AI employees.

Noted elements of Eightfold's network security infrastructure consist of the following:
- Firewalls
- Provisioning and Hardening
- Remote Access
- Patch Management
- Demilitarized zone (DMZ)

Boundaries of the System

The scope of this report includes the Talent Intelligence Platform Services System performed in the Santa Clara, California and Noida, India facilities.

This report does not include the cloud hosting services provided by AWS at various regions.

RELEVANT ASPECTS OF THE CONTROL ENVIRONMENT, RISK ASSESSMENT PROCESS, INFORMATION AND COMMUNICATION, AND MONITORING

Control Environment

Integrity and Ethical Values

The effectiveness of controls cannot rise above the integrity and ethical values of the people who create, administer, and monitor them. Integrity and ethical values are essential elements of Eightfold's control environment, affecting the design, administration, and monitoring of other components. Integrity and ethical behavior are the product of Eightfold's ethical and behavioral standards, how they are communicated, and how they are reinforced in practices. They include Management's actions to remove or reduce incentives and temptations that might prompt personnel to engage in dishonest, illegal, or unethical acts. They also include the communication of entity values and behavioral standards to personnel through policy statements and codes of conduct and by example.

Specific control activities that the service organization has implemented in this area are described below:
- Formally, documented organizational policy statements and codes of conduct communicate entity values and behavioral standards to personnel
- Policies and procedures require employees to sign an acknowledgment form indicating they have been given access to the employee manual and understand their responsibility for adhering to the policies and procedures contained within the manual
- A confidentiality statement agreeing not to disclose proprietary or confidential information, including client information, to unauthorized parties is a component of the employee handbook
- Background checks are performed for employees as a component of the hiring process

Commitment to Competence

Eightfold's Management is committed to the training and empowerment of its personnel to acquire and apply requisite skills and knowledge.

Specific control activities that the service organization has implemented in this area are described below:
- Formation of the dedicated security compliance function
- Consistent usage of their platform to evaluate matches between
- Candidates and job positions based on skill sets, not the personal relationship
- Training for every new employee on security, confidentiality, and a variety of HR policies
- Ongoing training across different functions on product knowledge, security, and industry knowledge

Management's Philosophy and Operating Style

Eightfold's Management communicates regularly in staff meetings on regulatory and industry changes that impact organizations such as the General Data Protection Regulation (GDPR) and the California Consumer Privacy Act (CCPA) privacy development. The executive management has established annual objectives for each function and reviews the progress on these objections across functions to ensure the companies' objectives are communicated and tracked.

One of Eightfold's corporate values is transparency. Management is open to feedback from the organization at each level. Risks are communicated and addressed regularly through leadership meetings, anonymous forums, and various management channels through HR, legal, and direct managers.

Specific control activities that the service organization has implemented in this area are described below:
- Management is periodically briefed on regulatory and industry changes affecting the services provided
- Executive management meetings are held to discuss major initiatives and issues that affect the business as a whole

Organizational Structure and Assignment of Authority and Responsibility

Eightfold's organizational structure is based on the overall size and nature of its activities. Management considers key areas of authority and responsibility, evaluates the adequacy of resources and experience for each area, and assigns accountability and responsibility to the functions.

Specific control activities that the service organization has implemented in this area are described below:
- Periodic review of the organizational chart
- The organizational chart is available and visible to employees
- Shift resources to address risks and timely responses to enterprise needs
- Annually review of objectives and status of meeting the objectives for each function of the organization

Human Resources Policies and Practices

Eightfold AI HR policies and procedures are stored centrally and communicated to employees. HR and Legal functions provide policies and training materials relating to employee hiring, orientation, evaluation, mentorship, and disciplinary activities.

Risk Assessment Process

Eightfold's risk assessment process identifies and manages risks that could potentially affect Eightfold's ability to provide reliable services to user organizations. This ongoing process requires that Management identify significant risks inherent in products or services as they oversee their areas of responsibility. Eightfold AI identifies the underlying sources of risk, measures the impact on the organization, establishes acceptable risk tolerance levels, and implements appropriate measures to monitor and manage the risks.

Eightfold AI Management meets periodically to identify and manage risks throughout the organization. These risks include:
- Operational risk - changes in the environment, staff, or management personnel
- Strategic risk - new technologies, changing business models, and shifts within the industry
- Compliance - legal and regulatory changes

Eightfold's Management also holds annual objective reviews of each functional area and ensures that key stakeholders are on track to meet the company objectives.

Integration with Risk Assessment

The environment in which the system operates, the commitments, agreements, and responsibilities of Eightfold's Talent Intelligence Platform Services System. The nature of the components of the system results in risks that the criteria will not be met. Eightfold AI addresses these risks by implementing suitably designed controls to provide reasonable assurance that the requirements are met. Because each system and the environment in which it operates are unique, the combination of risks to meeting the criteria and the controls necessary to address the risks will be unique. As part of the design and operation of the system, Eightfold's Management identifies the specific risks that the criteria will not be met and the controls necessary to address those risks.

Information and Communications Systems

Information and communication is an integral component of Eightfold's internal control system. It is the process of identifying, capturing, and exchanging information in the form and time frame necessary to conduct, manage, and control the entity's operations. This process encompasses the primary classes of transactions of the organization, including the dependence on and complexity of IT. At Eightfold, information is identified, captured, processed, and reported by various information systems, as well as through conversations with clients, vendors, regulators, and employees.

Internal communication and transparency are key at Eightfold. Eightfold AI uses internal communication tools for continual access and for internal notification announcements and daily communication. Customer announcements are made via e-mail.

Eightfold AI holds executive meetings designed to align upper-level management on strategic objectives and operational dependencies. Security and compliance meet periodically to discuss policies, procedures, and controls.

Specific information systems used to support Eightfold's Talent Performance system are described in the "Description of Services Provided" section above.

Monitoring Controls

Management monitors controls to ensure that they are operating as intended and that controls are modified as conditions change. Eightfold's Management performs monitoring activities to continuously assess the quality of internal control over time. Necessary corrective actions are taken as required to correct deviations from company policies and procedures. Employee activity and adherence to company policies and procedures are also monitored. This process is accomplished through ongoing monitoring activities, separate evaluations, or a combination of the two.

On-Going Monitoring

Eightfold AI monitors usage to ensure that systems and resources are being used appropriately.

Reporting Deficiencies

Escalation procedures are maintained for responding and notifying Management of any identified risks. Risks receiving a high rating are responded to immediately. Annual risk meetings are held for Management to review reported deficiencies and corrective actions.

Changes to the System Since the Last Review

No significant system changes have occurred to the services provided to user entities since the organization's last review. The product Workforce Exchange was added to the platform.

Incidents Since the Last Review

No significant incidents have occurred to the services provided to user entities since the organization's last review.

Criteria Not Applicable to the System

All Common Criteria/Security, Availability, Confidentiality and Privacy criterion were applicable to the Talent Intelligence Platform Services System.

Subservice Organizations

This report does not include the cloud hosting services provided by AWS.

Subservice Description of Services

Eightfold AI utilizes AWS Infrastructure as a Service (IaaS). They maintain numerous compliance certifications, including SOC 2. Eightfold AI obtains documentation from AWS that describes:
- Secure configuration, installation, and operation of the AWS Cloud Infrastructure
- Effective use and maintenance of security functions and mechanisms
- Known vulnerabilities regarding configuration and use of administrative i.e. privileged) functions
- User documentation for the AWS services used by Eightfold AI
- User-accessible security functions and mechanisms and how to effectively use those security functions and mechanisms in AWS
- Methods for user interaction with the AWS infrastructure
- User responsibilities in maintaining the security of the systems

Complementary Subservice Organization Controls

Eightfold's services are designed with the assumption that certain controls will be implemented by the subservice organization. Such controls are called complementary subservice organization controls. It is not feasible for all of the Trust Services Criteria related to Eightfold's services to be solely achieved by Eightfold AI control procedures. Accordingly, the subservice organization, in conjunction with the services, should establish their own internal controls or procedures to complement those of Eightfold.

The following subservice organization controls should be implemented by AWS to provide additional assurance that the Trust Services Criteria described within this report are met.

Subservice Organization - AWS		
Category	**Criteria**	**Control**
Common Criteria / Security	CC6.4	Physical access to data centers is approved by an authorized individual.
		Physical access is revoked within 24 hours of the employee or vendor record being deactivated.
		Physical access to the data centers is reviewed on a quarterly basis by the appropriate personnel.
		Physical access points to the server location are recorded by a closed-circuit television camera. Images are retained for 90 days unless limited by legal or contractual obligations.
		Physical access points to server locations are managed by electronic access control devices.
		Electronic IDS are installed within data server locations to monitor, detect, and automatically alert appropriate personnel of security incidents.
Availability	A1.2	Amazon-owned data centers are protected by fire detection and suppression systems.
		Amazon-owned data centers are air-conditioned to maintain appropriate atmospheric conditions. Personnel and systems monitor and control air temperature and humidity at appropriate levels.
		Uninterruptible Power Supply (UPS) units provide backup power in the event of an electrical failure in Amazon-owned data centers.

Subservice Organization - AWS		
Category	Criteria	Control
		Amazon-owned data centers have generators to provide backup power in case of electrical failure.
		Contracts are in place with third-party colocation service providers, which include provisions to provide fire suppression systems, air conditioning to maintain appropriate atmospheric conditions, UPS units, and redundant power supplies.
		AWS performs periodic reviews of colocation service providers to validate adherence with AWS security and operational standards.

Eightfold AI Management, along with the subservice organization, defines the scope and responsibility of the controls necessary to meet all the relevant Trust Services Criteria through written contracts, such as service level agreements. In addition, Eightfold AI performs monitoring of the subservice organization controls, including the following procedures:

- Reviewing attestation reports over services provided by vendors and subservice organization
- Monitoring external communications, such as customer complaints relevant to the services provided by the subservice organization

COMPLEMENTARY USER ENTITY CONTROLS

Eightfold's services are designed with the assumption that certain controls will be implemented by user entities. Such controls are called complementary user entity controls. It is not feasible for all of the Trust Services Criteria related to Eightfold's services to be solely achieved by Eightfold AI control procedures. Accordingly, user entities, in conjunction with the services, should establish their own internal controls or procedures to complement those of Eightfold.

The following complementary user entity controls should be implemented by user entities to provide additional assurance that the Trust Services Criteria described within this report are met. As these items represent only a part of the control considerations that might be pertinent at the user entities' locations, user entities' auditors should exercise judgment in selecting and reviewing these complementary user entity controls.

1. User entities are responsible for understanding and complying with their contractual obligations with Eightfold.
2. User entities are responsible for notifying Eightfold AI of changes made to technical or administrative contact information.
3. User entities are responsible for maintaining their own system(s) of record.
4. User entities are responsible for ensuring the supervision, management, and control of the use of Eightfold AI services by their personnel.
5. User entities are responsible for developing their own disaster recovery and business continuity plans that address the inability to access or utilize Eightfold AI services.
6. User entities are responsible for providing Eightfold AI with a list of approvers for security and system configuration changes for data transmission.
7. User entities are responsible for immediately notifying Eightfold AI of any actual or suspected information security breaches, including compromised user accounts, including those used for integrations and secure file transfers.