

## Technical and Organisational Measures

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| <b>Measures of pseudonymisation and encryption of personal data</b>                                                                                                           | Crownpeak ensures all private and customer data is encrypted and/or anonymized in transit and at rest.                                                                                                                            |
| <b>Measures for ensuring ongoing confidentiality, integrity, availability and resilience of processing systems and services</b>                                               | Crownpeak completes annual audits against all major controls which detail the tested processes of confidentiality, integrity, availability and resilience of the systems which house and process customer data.                   |
| <b>Measures for ensuring the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident</b>          | Disaster recovery and business continuity procedures are clearly defined and tested on a continual basis. Scenarios are played out and reviewed in an annual risk assessment to ensure appropriate mitigation efforts.            |
| <b>Processes for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures in order to ensure the security of the processing</b> | Information Security oversight is maintained by the Data Protection Office consisting of the CISO, DPO and heads of technology and engineering. Monthly, Quarterly and Yearly testing over controls occur and gaps are remediated |
| <b>Measures for user identification and authorisation</b>                                                                                                                     | Regimented controls are in place for onboarding, offboarding and account access control                                                                                                                                           |
| <b>Measures for the protection of data during transmission</b>                                                                                                                | Encryption and advanced algorithms are used to protect transmission of data                                                                                                                                                       |
| <b>Measures for the protection of data during storage</b>                                                                                                                     | Data at rest is stored in encrypted AES format                                                                                                                                                                                    |
| <b>Measures for ensuring physical security of locations at which personal data are processed</b>                                                                              | AWS SOC2 details all physical controls in place for data centers                                                                                                                                                                  |
| <b>Measures for ensuring events logging</b>                                                                                                                                   | Events are logged through an advanced SIEM and overseen by a 24/7 managed Security Operations Center                                                                                                                              |
| <b>Measures for ensuring system configuration, including default configuration</b>                                                                                            | Crownpeak audit reports detail management of secure configurations and removal of default configurations                                                                                                                          |
| <b>Measures for internal IT and IT security governance and management</b>                                                                                                     | Oversight of security controls and governance is led by the Data Protection Office which consists of CISO, DPO and heads of the technology groups                                                                                 |

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| <b>Measures for certification/assurance of processes and products</b> | Crownpeak completes audits and Data Privacy Framework Certification each year                                                                                                                                     |
| <b>Measures for ensuring data minimisation</b>                        | Controls concerning data management and minimization are detailed in Crownpeak's audit controls which state that systems are protected by strict controls limiting data to the minimum required for the services. |
| <b>Measures for ensuring data quality</b>                             | Data quality is ensured through management controls put in place to oversee data ingestion through change management which is described in Crownpeak's audit reports.                                             |
| <b>Measures for ensuring limited data retention</b>                   | Data retention is defined per customer engagement and enforced through standard controls.                                                                                                                         |
| <b>Measures for ensuring accountability</b>                           | Management oversees all aspects of the Information Security control practices and tracks aspects of the program through risk management, roadmap and risk register procedures.                                    |
| <b>Measures for allowing data portability and ensuring erasure</b>    | Physical management of data and erasure is governed by controls detailed in the Crownpeak audit procedures.                                                                                                       |