System and Organization Controls (SOC 3) Report

Independent Assurance Report on Controls at Service Organization

Expper Technologies, Inc.

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Independent Assurance Report on the Description of Controls, their Design and Operating Effectiveness

To the Management of Expper Technologies, Inc.

Scope

We have performed an independent reasonable assurance engagement on Expper Technologies, Inc.'s description of its system entitled "Robin the Robot" (including Expper Applications) on pages 7-10, for the period from 15 May 2022 to 18 November 2022 (the "System Description"), and on the design and operation of controls related to control objectives stated in the System Description, based on the criteria for the security, availability, processing integrity, confidentiality and privacy (Control Criteria) set forth in the AICPA's TSP section 100A, *Trust Services Principles and Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy*.

Expper Technologies, Inc. uses a subservice organization, 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 Expper Technologies, Inc., to achieve Expper Technologies, Inc.'s service commitments and system requirements based on the applicable trust services criteria. The description presents Expper Technologies, Inc.'s controls, the applicable trust services criteria, and the types of complementary subservice organization controls assumed in the design of Expper Technologies, Inc.'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 Expper Technologies, Inc., to achieve Expper Technologies, Inc.'s service commitments and system requirements based on the applicable trust services criteria. The description presents Expper Technologies, Inc.'s controls, the applicable trust services criteria, and the complementary user entity controls assumed in the design of Expper Technologies, Inc.'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.

Management's Responsibilities

In "Expper Technologies, Inc. Management Statement", Expper Technologies, Inc. has provided a statement about the fairness of the presentation of the System Description and the design and operating effectiveness of the controls to achieve the related control objectives. Management of Expper Technologies, Inc. is responsible for preparing the Description and the accompanying Statement on pages 5-6, including the completeness, accuracy, and method of presentation of the System Description and the Statement, providing the services covered by the System Description, specifying the control objectives and stating them in the System Description, identifying the risks that threaten the achievement of the control objectives, selecting the criteria stated in the Statement, and designing, implementing, documenting and effectively operating controls to achieve the stated System-related control objectives.

Our Independence and Quality Control

We have complied with the independence and other ethical requirements of the *Code of Ethics for Professional Accountants* issued by the International Ethics Standards Board for Accountants, which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behavior.

The firm applies International Standard on Quality Control 1 and accordingly maintains a comprehensive system of quality control, including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Practitioner's Responsibilities

Our responsibility is to express an opinion on Expper Technologies, Inc.'s System Description and on the design and operating effectiveness of the controls to achieve the related control objectives stated in the System Description, based on our procedures.

We conducted our engagement in accordance with the "*International Standard on Assurance Engagements 3000 (Revised): Assurance Engagements other than Audits or Reviews of Historical Financial Information"* issued by the International Auditing and Assurance Standards Board. That standard requires that we plan and perform our procedures to obtain reasonable assurance about whether, in all material respects, based on the criteria stated in management's Statement, the System Description is fairly presented and the controls were suitably designed and operating effectively to achieve the related control objectives stated in the System Description.

An assurance engagement to report on the service organization's system and the suitability of the design and operating effectiveness of controls involves performing procedures to obtain evidence about the fairness of the System Description presentation and the suitability of the design and operating effectiveness of the controls to achieve the related control objectives, based on the criteria in management's Statement. The procedures selected depend on the practitioner's judgment, including the assessment of risks that the System Description is not fairly presented and that the controls were not suitably designed or operating effectively to achieve the related control objectives stated in the System Description. Our procedures included testing the operating effectiveness of those controls that we consider necessary to provide reasonable assurance that the related control objectives stated in the System Description were achieved. An assurance service of this type also includes evaluating the overall presentation of the System Description, suitability of the control objectives and suitability of the criteria specified by the service organization in its assertion.

We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

Inherent Limitations of Controls

The System Description is prepared to meet the common needs of a broad range of user entities and their auditors who audit and report on user entities' environments and systems and may not, therefore, include every aspect of the system that each individual user entity may consider important in its own particular environment.

Because of their nature, controls at a service organization may not prevent, or detect and correct, all errors or failures, including the possibility of human error and circumvention of controls. Because of inherent limitations in its internal control, those controls may provide reasonable, but not absolute, assurance that its commitments and system requirements related to security, availability, processing integrity, confidentiality, and privacy will be achieved.

Examples of inherent limitations in an entity's security controls include the following:

- Vulnerabilities in information technology components as a result of design by their manufacturer or developer;
- Ineffective controls at a vendor or business partner;
- Persistent attackers with the resources to use advanced technical means and sophisticated social engineering techniques specifically targeting the entity.

Also, the projection to the future of any evaluation of the fairness of the presentation of the System Description, or conclusions about the suitability of the design or operating effectiveness of the controls to achieve the related control objectives, is subject to the risk that controls at a service organization may become inadequate or fail.

Opinion

Our opinion has been formed on the basis of the matters outlined in this report. The criteria we used in forming our opinion are described on pages 5-6.

In our opinion, in all material respects:

- the System Description fairly presents Expper Technologies, Inc.'s System as designed and implemented throughout the period from 15 May 2022 to 18 November 2022;
- the controls related to the control objectives stated in the System Description were suitably designed throughout the period from 15 May 2022 to 18 November 2022 if its controls operated effectively throughout the period and if the subservice organization and user entities applied the complementary controls assumed in the design of Expper Technologies, Inc.'s controls throughout the period;
- the controls tested, which were those necessary to provide reasonable assurance that the control objectives stated in the System Description were achieved, operated effectively throughout the period from 15 May 2022 to 18 November 2022 and if the subservice organization and user entities applied the complementary controls assumed in the design of Expper Technology, Inc.'s controls throughout the period.

Grant Thornton Consulting CJSC

5 December 2022

Expper Technologies, Inc. Management Statement

Expper Technologies, Inc. Management's Statement Regarding the Effectiveness of its Controls, Based on the Trust Services Principles and Criteria for Security, Availability, Confidentiality, Processing Integrity and Privacy

We have prepared the accompanying description of Expper Technologies, Inc.'s System entitled "Robin the Robot" (including Expper Applications), throughout the period from 15 May 2022 to 18 November 2022, for user entities of the services and their auditors who audit and report on such user entities' in the areas of security, availability, confidentiality, processing integrity and privacy and have a sufficient understanding to consider it, along with other information, including information about controls implemented by user entities of the system themselves, when assessing the risks related to internal control related to security, availability, confidentiality, processing integrity and privacy.

Expper Technologies, Inc. uses a subservice organization to provide data center facility and hosting services. The description indicates that complementary subservice organization controls that are suitably designed and operating effectively are necessary, along with controls at Expper Technologies, Inc., to achieve Expper Technologies, Inc.'s service commitments and system requirements based on the applicable trust services criteria. The description presents Expper Technologies, Inc.'s controls, the applicable trust services criteria, and the types of complementary subservice organization controls assumed in the design of Expper Technologies, Inc.'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, along with controls at Expper Technologies, Inc., to achieve Expper Technologies, Inc.'s service commitments and system requirements based on the applicable trust services criteria. The description presents Expper Technologies, Inc.'s controls, the applicable trust services criteria and the complementary user entity controls assumed in the design of Expper Technologies, Inc.'s controls.

The System description does not extend to the controls of the subservice organizations, or the controls of the user entities as set out in "Terms of Use" at https://expper.tech/terms/.

We confirm, to the best of our knowledge and belief, that:

- System description fairly presents Expper Technologies, Inc.'s System during the period from 15 May 2022 to 18 November 2022 as it relates to controls of security, availability, confidentiality, processing integrity and privacy. The criteria we used in making this statement were that the System description:
  - presents how the System was designed and implemented to process relevant user entity data, including, if applicable:
    - types of services provided, including, as appropriate, the types of data processed;
    - the procedures, within both automated and manual systems, by which those services are provided, including, as appropriate, procedures by which transactions are initiated, authorized, recorded, processed, corrected as necessary, and transferred to the reports and other information prepared for user entities;
    - how the system captures and addresses significant events and conditions;
    - relevant control objectives and controls designed to achieve those objectives;
    - other aspects of our control environment, risk assessment process, information and communications (including the related business processes), control activities, and monitoring activities that are relevant to the services provided.
  - includes relevant details of changes to Expper Technologies, Inc.'s system during the period covered by the System Description;

  - does not omit or distort information relevant to Expper Technologies, Inc.'s system, while acknowledging that the description is prepared to meet the common needs of a broad range of user entities of the system and their user auditors, and may not, therefore, include every aspect of the Expper Technologies, Inc.'s System that each individual user entity and its auditor may consider important in its own particular environment.

- controls related to the control objectives stated in the System Description were suitably designed and operating effectively throughout the period from 15 May 2022 to 18 November 2022 to achieve those control objectives, if the organization applied the complementary controls assumed in the design of Expper Technologies, Inc.'s controls throughout the period from 15 May 2022 to 18 November 2022. The criteria we used in making this assertion are the following:
  - Risks that threaten the achievement of the control objectives stated in the System Description have been identified by the management of Expper Technologies, Inc.;
  - Controls identified in the System Description would, if operated as described, provide reasonable assurance that those risks would not prevent the control objectives stated in the System Description from being achieved;
  - Controls were consistently applied as designed, including manual controls were applied by individuals who have the appropriate competence and authority.
- System was protected against unauthorized access, use, or modification to achieve Expper Technologies, Inc.'s commitments and system requirements;
- System was available for operation and use, to achieve Expper Technologies, Inc.'s commitments and system requirements;
- System information is collected, used, disclosed, and retained to achieve Expper Technologies, Inc.'s commitments and system requirements;
- System processing is complete, valid, accurate, timely, and authorized to meet Expper Technologies, Inc.'s commitments and system requirements;
- Personal information is collected, used, retained, disclosed, and disposed to meet Expper Technologies, Inc.'s commitments and system requirements, based on the Control Criteria.

Expper Technologies, Inc. Management

25 November 2022

Expper Technologies, Inc.’s System Description

Expper Technologies, Inc. Background

Expper Technologies, Inc. is a company that created Robin the Robot, an Automated Care Extender that assists front-line clinicians across a multitude of settings by supporting caregiving functions. The company is committed to creating a state-of-the-art innovation that aims to revolutionize the healthcare industry and change the way care is being delivered. By developing cutting-edge technologies, they positively impact people's lives from pediatric to elderly populations and beyond, provide a better experience for the patients and care providers, and improve the quality of care.

Control Environment

Expper Technologies, Inc. management has identified the controls over the system throughout the period from 15 May 2022 to 18 November 2022 to achieve its commitments and system requirements related to the operation using the criteria for security, availability, processing integrity, confidentiality and Privacy (Control Criteria) set forth in the AICPA’s TSP section 100A, *Trust Services Principles and Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy*. Based on this, the management has selected a set of controls to provide reasonable assurance that:

- System is protected against unauthorized access, use, or modification to achieve Expper Technologies, Inc.’s commitments and system requirements;
- System is available for operation and use, to achieve Expper Technologies, Inc.’s commitments and system requirements;
- System information is collected, used, disclosed, and retained to achieve Expper Technologies, Inc.’s commitments and system requirements;
- System processing is complete, valid, accurate, timely, and authorized to meet Expper Technologies, Inc.’s commitments and system requirements;
- Personal information is collected, used, retained, disclosed, and disposed to meet Expper Technologies, Inc.’s commitments and system requirements, based on the Control Criteria.

Scope

The scope of the systems covered in this report includes:

The key product of the Company is:

- “Robin the Robot” Automated Care Extender

The key organizational units (teams) of the Company are:

- Research and Strategy team located in Armenia,
- Engineering team located in Armenia,
- Software team located in Armenia,
- Psychologists located both in the US and in Armenia,
- People Operations manager located in Armenia,
- Sales and Marketing team located in the US,
- Business Development team located both in the US and in Armenia,

- Support (Customer Service) team located both in the US and in Armenia,
- Manufacturing team located in Armenia.

The role of the Chief Information Security Officer is assigned to Areg Gasparyan, VP of Software.

The key internal and product development tools of the Company:

- AWS,
- Cloudflare,
- GSuite,
- Slack,
- Gitlab,
- ElasticSearch,
- Jira,
- Kibana,
- Logstach,
- Suricata.

All of the Company's servers are hosted at AWS.

Overview of the key products of the Company

Expper Technologies, Inc. created Robin the Robot, an Automated Care Extender that assists front-line clinicians across a multitude of settings by supporting caregiving functions. Robin has a broad set of capabilities, including conversational AI, patient monitoring system, and robotics, making it a comprehensive tool for medical settings. The Company's current target customers are pediatric facilities (hospitals/clinics/dental practices). Robin aims to fill the current and growing shortage of care providers, improve patient access, outcome and experience, and increase clinician satisfaction and safety. Case examples of these targets for the pediatric care teams' early adopters have already demonstrated:

- **Improved health outcomes:**
  Robin prepares children for medical procedures by providing explanations using child-friendly language and animations, which in turn reduces stress. Robin's technology also utilizes active distraction techniques with visual and auditory modalities to decrease fear and anxiety, at times minimizing/avoiding any medications. Robin supports children's emotional health and well-being with child-friendly interactions, empathic conversations, and various therapeutic techniques.
- **Enhanced patient experience:**
  Robin provides a meaningful connection to children with natural interactions and age-appropriate dialogues. Robin increases patients' positive emotions by using an extensive set of engaging and interactive games, utilizing coping mechanisms such as breathing techniques and mindfulness strategies to facilitate mental wellbeing, age, and ability-appropriate physical activities to reduce stress. With Robin's presence, pediatric patients feel a unique peer connection that nurtures positive emotions, creates a safe socialization environment and reduces feelings of loneliness and isolation. Robin also educates children about medical procedures, tools, and steps and influences a child's overall well-being by teaching healthy habits and behaviors.
- **Improved clinician experience**:
  With Robin, staff members can automate tasks to decrease staff workload and prevent burnout. The medical staff can easily access the robot remotely and provide patient consultations from any location. Aside from that, medical staff can delegate responsibilities to the robot, such as bedside

support, emotional support, aiding in rehab, and facilitating caregivers to provide clinical interventions.

- **Reduced costs:**
  With their customers, The Company establishes a minimum one-year contract with a monthly subscription fee of $2,500. For medical settings, considering that studies have shown that up to a third of nursing time is spent on non-value-add activities, Robin is a cost-efficient way to provide broader care services to patients, realize up to 4 times lower operating costs, and optimize clinical time efficiency. With Robin the Robot, medical facilities can augment child services capacity and have less downtime in between procedures due to increased cooperation of *children with medical staff.*

Technology Overview

Expper Technologies, Inc.'s technology incorporates validated and the most effective psychological practices and methods for stress and anxiety reduction. Robin utilizes evidence-based practices such as play-based techniques, behavioral strategies, and active distractions to support children's emotional health. In cooperation with scientists, engineers, and pediatric psychologists, Expper Technologies, Inc. created a human-centric technology that aims to attract children's attention and encourage them to form trusting relationships. The Company's operators give the possibility to unlock the most human-like interactions with pediatric patients and create a friendly and familiar atmosphere for them. Due to this technology, the Company has access to a unique set of data on patient behavior, common dialogues, and conversational patterns, which is the key to developing state-of-the-art human-machine interfaces.

- **Product technical specification:**
  Robin's height is 1.20 meters, the main physical parts are the following:
  - Body shape glance white color,
  - Body movement mechanism with Omni wheels, this part also includes special coolers,
  - Head includes:
    - Mechanics for movement,
    - 2x speaker,
    - Microphone,
    - Front camera,
    - Bottom camera,
  - PC with Ubuntu 20.04,
  - Logo light,
  - Battery.
- **Robot Embedded software**
  - There are 3 serial connections for communicating Robin software with hardware,
  - All serial ports establishment is done in the same way, when Robin software is starting they traverse through all USB serial devices and using serial Python library after opening the port sent to hardware JSON.

- **Robot High-level Software**

  Robin is a complex software, which includes communication between embedded software and cloud systems and with the Company's cloud infrastructures which are hosted at https://portal.expper.tech.

  This domain is accessible only through an internal VPN connection, which means that after booting Robin needs to connect to VPN. Having a VPN connection the operation, updates or bug fixing are done securely.

  The main software is written in Python 3.10, the UI part is written in JavaScript, HTML, CSS.

  The Robin runs on **Ubuntu 20.04** and displays UI using **Chromium** with a local Django server.

- **Portal Cloud System**

  https://portal.expper.tech is the domain on VPN internal network that serves as a hub for robots and operators. The portal provides functionality for adding content for robots automatically, observing statistics, and changing robots' configurations.

  Robots periodically make requests to the portal for statistics and for receiving new actions to perform from the portal via REST API. Additionally, a WebSocket connection is created from the robot to portal.

  When an operator opens a robot's control panel, the operator UI also connects to the portal via WebSocket connection. The portal serves as a hub which receives a command from an operator via WebSocket and sends it to a specific Robot Robin via WebSocket. In the same path Robin can response state of action as "done".

Infrastructure

Expper Technologies, Inc.'s infrastructure includes the facilities, network, and hardware, as well as some operational software (e.g., host operating system, virtualization software, etc.) that support the provisioning and use of these resources. Expper Technologies, Inc.'s infrastructure is designed and managed in accordance with security compliance standards and Expper Technologies, Inc.'s security policies.

All of the Company's servers are hosted at AWS. VPC is located in Frankfurt. There are 6 instances used in AWS:

- expper-web-inst,
- expper-portal-inst,
- expper-gitlab-inst,
- expper-es-inst,
- expper-ovpn-inst,
- expper-sq-inst.

3 subnets are used in AWS: public, web, and private. Security groups are created for each AWS instance with inbound and outbound rules defined.

Only communication area (switch room) is located in the Yerevan office, which serves the internal network and enterprise Wi-Fi access points.

Locations

The locations covered in this report include:

- 1 Charents street, Yerevan 0025, Armenia,
- 326 Mira Loma Ave, Glendale, CA 91204, US.

People

Expper Technologies, Inc.'s organizational structure provides a framework for planning, executing and controlling business operations. Executive and senior leadership play important roles in establishing Company's tone and core values. The organizational structure assigns roles and responsibilities to provide for adequate staffing, security, efficiency of operations, and segregation of duties. Management has also established authority and appropriate lines of reporting for key personnel.

The Company follows a structured on-boarding process to familiarize new employees with dedicated information systems, tools, processes, systems, security practices, policies and procedures. Employees are provided with the set of the Expper Technologies, Inc.'s policies and pass induction training to educate them as to their responsibilities concerning information security.

Customer Data

Expper Technologies, Inc. stores only legal data as personal information in the cloud platforms.

Availability

Expper Technologies, Inc.'s solutions are architected in a manner to maintain availability of its services through defined programs, processes, and procedures. The Business Continuity Program encompasses the processes and procedures by which Expper Technologies, Inc. identifies, responds to, and recovers from a major event or incident within the environment. This program builds upon the traditional approach of addressing contingency management, incorporating elements of business continuity and disaster recovery plans while expanding to consider critical elements of proactive risk mitigation strategies. These strategies include continuous infrastructure capacity planning.

Contingency plans and incident response playbooks are maintained to reflect emerging continuity risks and lessons learned. Plans are tested and updated through the course of business, and the Expper Technologies, Inc.'s Business Continuity Program is regularly reviewed and approved by senior leadership.

Expper Technologies, Inc. has identified critical system components required to maintain the availability of the system and recover services in the event of an outage. These components are replicated across multiple availability zones; authoritative backups are maintained and monitored to ensure successful replication.

Expper Technologies, Inc.'s solutions operate on cloud platforms (AWS). VPC is located in Frankfurt. There are 6 instances used in AWS:

- expper-web-inst,
- expper-portal-inst,
- expper-gitlab-inst,
- expper-es-inst,
- expper-ovpn-inst,
- expper-sq-inst.

3 subnets are used in AWS: public, web, and private. Security groups are created for each AWS instance with inbound and outbound rules defined.

Sensitive user data is kept in an encrypted manner. All data storages used in Company's environment are encrypted based on industry best practices (AES256 for data-at-rest).

All connections to the frontend and backend are encrypted with strong encryption protocols while in transit (at least TLS 1.2). It is fully automated and monitored by continuous functional tests to detect any sort of downtime, protect infrastructure needs and support availability commitments and requirements. Additionally, Expper Technologies, Inc. maintains a capacity planning model to assess infrastructure usage and demands.

Security

Expper Technologies, Inc. has established information security policies and there is an executive-level commitment to implement and follow the policies throughout the organization. Expper Technologies, Inc. communicates its security commitment to customers in "Privacy Policy" at https://www.expper.tech/privacy/.

Information Security program is led by the CTO of Expper.

Confidentiality

Expper Technologies is committed to protecting the security and confidentiality of its customers' content, defined "Privacy Policy" at https://www.expper.tech/privacy/.

Internally, confidentiality requirements are communicated to employees through training and policies. Employees are required to attend security awareness training, which includes information, policies, and procedures related to protecting customers' content. Expper Technologies, Inc. monitors the performance of third parties through periodic reviews, which evaluate performance against contractual obligations, including confidentiality commitments.

Privacy

Expper Technologies, Inc. is committed to protecting the personal data of its customers' content, defined as "Privacy Policy" at https://www.expper.tech/privacy/. Expper Technologies, Inc. communicates its privacy commitment to customers in "Terms of Use" at https://expper.tech/terms/.

Complementary user entity controls

Expper Technologies, Inc.'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 the Trust Services Criteria related to Expper's services to be solely achieved by Expper Technologies, Inc.'s control procedures. Accordingly, user entities should establish their own internal controls or procedures to complement those of Expper Technologies, Inc.

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. These controls should not be regarded as a comprehensive list of all controls that might be pertinent at the user entities' locations. User entities' management is responsible for selecting and implementing these complementary user entity controls:

1. Ensuring the compliance with Expper's Privacy Policy by their personnel and their clients;
2. Understanding and complying with their contractual obligations to Expper Technologies, Inc.;
3. Notifying Expper Technologies, Inc. of changes made to technical administrative contact information;

4. Notifying Expper Technologies, Inc. regarding new, terminated user accounts and changes necessary thereto;
5. Immediately notifying Expper Technologies, Inc. of any actual or suspected information security breaches involving Robin the Robot, including compromised user accounts;
6. Grant access only to authorized and trained personnel and removing access when no longer necessary or appropriate;
7. Ensuring the supervision, management, and control of the use of Robin and the Services by their personnel and their clients;
8. Developing internal policies for business recovery and continuity, that address the inability to access or utilize Robin the Robot;
9. Preventing the loss, malfunctioning, or damage to Robin.

Complementary subservice organization controls

When controls at a vendor are necessary in combination with Expper Technologies, Inc.'s controls to provide reasonable assurance that Expper Technologies, Inc.'s service commitments and system requirements are achieved, based on the applicable trust services criteria, the vendor is considered a subservice organization. Expper Technologies, Inc.'s services are designed with the assumption that certain controls will be implemented by subservice organizations (complementary subservice organization controls). It is not feasible for all the Trust Services Criteria related to Expper Technologies, Inc.'s services to be solely achieved by Expper Technologies, Inc.'s control procedures. Accordingly, subservice organizations should establish their own internal controls or procedures to complement those of Expper Technologies, Inc.

Management has identified the following subservice organization and has elected the carve-out method for the purpose of System Description and management assertion.

Subservice organization	Description
AWS	Cloud hosting services

Complementary subservice organization controls

The following are the applicable trust services criterial and controls that subservice organizations should establish to complement those of Expper Technologies, Inc., provide additional assurance that the Trust Services Criteria described within this report are met.

Criteria	Control
CC6 Series **Logical and Physical Access**	- Physical access to the datacenter facilities is restricted to authorized personnel. - Physical access to data centers is approved by an authorized individual. - Procedures are implemented to authenticate authorized users, restrict access and detect unauthorized access attempts. - Security measures are implemented to provision and de-provision user access to systems and applications based on appropriate authorization.

Criteria	Control
	- Encryption has been implemented, by default or as configured by the subservice organization, to secure the transmission and storage of information. - Procedures are implemented to securely decommission and physically destroy production assets.
CC7 Series **System Operations**	- Vulnerability scans and penetration testing are performed periodically to identify vulnerabilities threatening the systems. - Incident response procedures are established and implemented to identify, analyze and remediate events and/or incidents. - Environmental protections, monitoring and procedures for regular maintenance are implemented at the datacenter facilities.
CC8 Series **Change Management**	- Procedures are established and implemented to ensure changes to systems are authorized, designed, developed, configured, documented, tested, and approved prior to production deployment.
A Series **Availability**	- Monitoring tools are implemented to monitor and manage the capacity and availability of hosting infrastructure. - Environmental protections, data backup processes and recovery mechanisms have been implemented and are appropriately tested to adequately address availability requirements.

Expper Technologies, Inc.'s management, along with the subservice organizations, defines the scope and responsibility of the controls necessary to meet all the relevant Trust Services Criteria trough written contracts, such as SLAs. In addition, Expper Technologies performs monitoring of the subservice organization controls, including the following:

- Holding periodic discussions with vendors and subservice organizations,
- Reviewing attestation reports over services provided by vendors and subservice organizations, if applicable.