pipedrive™

REPORT ON

PIPEDRIVE'S

DESCRIPTION OF SALES MANAGEMENT SYSTEM AND ON THE SUITABILITY OF ITS CONTROLS RELEVANT TO SECURITY, AVAILABILITY, CONFIDENTIALITY AND PRIVACY THROUGHOUT THE PERIOD

OCTOBER 1, 2019 - SEPTEMBER 30, 2020

MARCUM
ACCOUNTANTS ▲ ADVISORS

TABLE OF CONTENTS

Acronym Table

AICPA	American Institute of Certified Public Accountant
AT-C	U.S. Attestation Standard– AICPA (Clarified)
AWS	Amazon Web Services
CEO	Chief Executive Officer
CRM	Customer Relationship Management
GAPP	Generally Accepted Privacy Principles
HR	Human Resources
IIS	Internet Information Services (Microsoft)
IP	Internet Protocol
IPS	Intrusion Prevention System
IT	Information Technology
NAT	Network Address Translation
PII	Personally Identifiable Information
Pipedrive	Pipedrive, Inc and Pipedrive OÜ
QE	Quality Engineering
RDS	Relational Database Service
SDLC	Software Development Life Cycle
SLA	Service Level Agreement
SOC	System and Organization Control
TLS	Transport Layer Security
TSP	Trust Service Principles
VM	Virtual Machine
VP	Vice President
VPN	Virtual Private Network

Section 1: Assertion of the Management of Pipedrive

Assertion of the Management of Pipedrive, Inc.

We are responsible for designing, implementing, operating, and maintaining effective controls within Pipedrive, Inc.'s (Pipedrive's) Sales Management System (system) throughout the period October 1, 2019 to September 30, 2020, to provide reasonable assurance that Pipedrive's service commitments and system requirements relevant to security, availability, confidentiality, and privacy were achieved. Our description of the boundaries of the system is presented in section 3 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 October 1, 2019 to September 30, 2020, to provide reasonable assurance that Pipedrive'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*). Pipedrive'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 section 3.

There are inherent limitations in any system of internal control, including the possibility of human error and the circumvention of controls. Because of their 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, 2019 to September 30, 2020, to provide reasonable assurance that Pipedrive's service commitments and system requirements were achieved base on the applicable trust services criteria.

/s/ Raj Shoblok, CEO

Pipedrive, Inc.

12/10/2020

Section 2: Independent Service Auditors' Report

Independent Service Auditors' Report

To: PipeDrive, Inc.:

Scope

We have examined Pipedrive, Inc.'s (Pipedrive's) accompanying assertion titled "Assertion of Pipedrive Management" (assertion) that the controls within Pipedrive's Sales Management System (system) were effective throughout the period October 1, 2019 to September 30, 2020, to provide reasonable assurance that Pipedrive'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*).

Service Organization's Responsibilities

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

Service Auditors' Responsibilities

Our responsibility is to express an opinion, based on our examination, on whether management's assertion that controls within the system were effective throughout the period to provide reasonable assurance that the service organization's service commitments and system requirements were achieved based on the applicable trust services criteria. 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.

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 Pipedrive'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 Pipedrive'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 Pipedrive's Sales Management System were effective throughout the period October 1, 2019 to September 30, 2020, to provide reasonable assurance that Pipedrive's service commitments and system requirements were achieved based on the applicable trust services criteria is fairly stated, in all material respects.

Marcum LLP

Marcum LLP

December 10, 2020

Tampa, Florida

Section 3: Pipedrive's Description of its Sales Management System Throughout the Period October 1, 2019 to September 30, 2020

Company Overview and Services Provided

Pipedrive is a software development company that implements CRM software for enterprise clients. The Pipedrive software is utilized by over 50,000 companies around the world. Pipedrive is most widely used as a CRM program to drive sales and grow the bottom line but it has also been used in recruiting and other facets. Pipedrive was founded in Tallinn, Estonia in 2010 and has since expanded to Tartu, Estonia, Lisbon Portugal, London England, New York New York, Prague, Czech Republic, Florida, Dublin Ireland, Riga Latvia.

The Sales Management System SaaS product was developed with activity-based selling in mind. Activity-based selling is a sales management strategy that links the cause and effect relationship between sales activities and business results.

Principal Service Commitments and System Requirements

Pipedrive designs its processes and procedures related to its Sales Management System to meet its objectives. Those objectives are based on the service commitments that Pipedrive makes to user entities, the laws and regulations that govern SaaS providers, and the financial, operational, and compliance requirements that Pipedrive has established for the services. The CRM services of Pipedrive are subject to the GDPR regulations in the jurisdictions in which Pipedrive operates.

Security commitments to user entities are documented in customer agreements. Security commitments are standardized and include, but are not limited to, the following:

- Security principles within the fundamental designs of the Sales Management System that are designed to permit system users to access the information they need based on the permission of least privilege provisioning.
- Use of encryption protocols to protect customer data at rest and in transit.

Availability commitments to user entities are documented in customer agreements. Availability commitments are standardized and include, but are not limited to, the following:

- Managing capacity demand through the monitoring and evaluation of current processing capacity and usage rates.
- Meeting Company objectives through authorization, design, development, and monitoring of data backup processes and recovery infrastructure.
- Environmental monitoring of conditions within key production areas.

Confidentiality commitments to user entities are documented in customer agreements. Confidentiality commitments are standardized and include, but are not limited to, the following:

- Information is defined and classified into categories with associated periods.
- Data retention and disposal policies and procedures are documented and in place.

Processing integrity commitments to user entities are documented in customer agreements. Processing integrity commitments are standardized and include, but are not limited to, the following:

- The Company has defined data processing and reporting requirements, standards, and data sources.
- System inputs and outputs are measured and recorded completed, accurately, and timely.
- Policies and procedures are documented and in place to help ensure system processing results meet the entity's objectives.

Privacy commitments to user entities are documented in customer agreements. Privacy commitments are standardized and include, but are not limited to, the following:

- A privacy notice is documented and includes provisions for collection, use, and disclosure and disposal of personal information.

Pipedrive establishes operational requirements that support the achievement of security, availability, confidentiality, and privacy commitments, relevant laws and regulations, and other system requirements. Such requirements are communicated in Pipedrive's system policies and procedures, system design documentation, and contracts with customers. Information security policies define an organization-wide approach to how systems and data are protected. These include policies around how the service is designed and developed, how the system is operated, how the internal business systems and networks are managed and how employees are hired and trained. In addition to these policies, standard operating procedures have been documented on how to carry out specific manual and automated processes required in the operation and development of the Sales Management System.

Significant Changes throughout the Examination Period

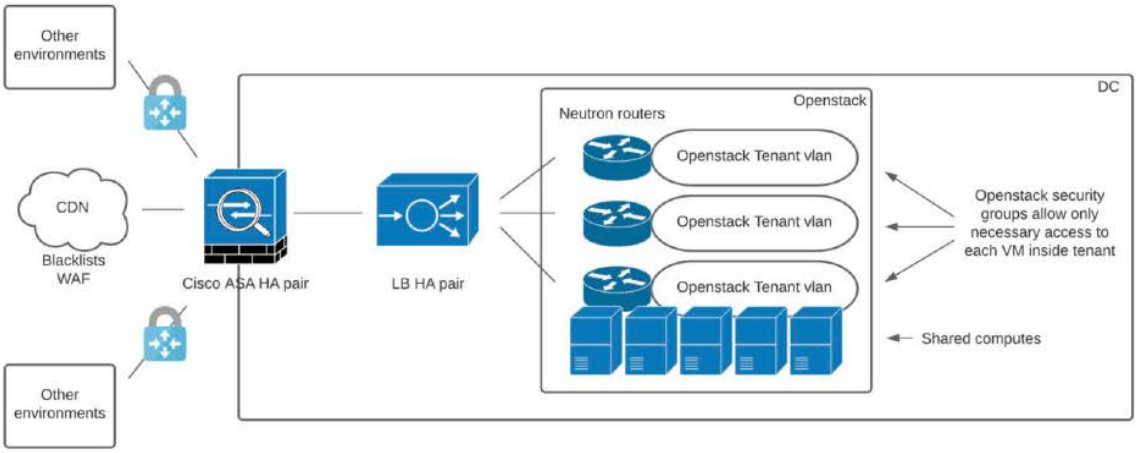
There were no significant changes throughout the examination period.

Infrastructure

The infrastructure supporting the Sales Management System consists of the following:

- Debian and Ubuntu production application servers
- A load balancer located within Rackspace to distribute traffic to Sales Management System web application servers
- MySQL Server database server to support the Sales Management System web application
- Jenkins automation server for continuous deployment
- Consul for service discovery
- Kubernetes for clustering and scheduling containers
- A batch server to run schedule jobs
- Cisco AnyConnect VPN server appliance
- Chef SSH cookbook

The Pipedrive Sales Management System is entirely hosted within Rackspace and AWS. The Sales Management web application is written in PHP and NodeJS that runs on multiple Linux servers within Rackspace. Pipedrive utilizes a cloud load balancer that distributes traffic to application servers running the Sales Management website application. There is also a batch server which is used to run various scheduled jobs. Database services are provided by a MySQL database servers. The system utilizes a Cisco VPN communications server to establish an IPSec VPN tunnel between the Tallinn office and the New York office as well as the IPSec VPN tunnel from Tallinn and Tartu to Rackspace in Chicago. Backups are stored within the AWS US East region in S3. The AWS environment houses the development, testing, and staging environments. The testing and staging environments share hardware and a load balancer. The development environment consists of one server which replicates all aspects of the production environment except for the production database contents. Pipedrive also used Chef SSH to manage and spin up all of their instances.



Software

The following provides a summary of the systems used to deliver the Sales Management System:

- MySQL Server is the relational database management system.
- Confluence team collaboration software stores and organizes Pipedrive's policies and procedures.
- Bamboo stores the organizational hierarchy and made available to employees.
- 7Geese stores HR documentation and personnel files such as employee contracts and evaluations.
- Jira ticketing software is used to track and respond to development issues, requests, and bugs.
- Github is used for version control software utilized in the development process.

The Pipedrive Sales Management production SaaS System is entirely hosted within Rackspace. The Sales Management web application is written in PHP and NodeJS that runs on multiple Linux servers within Rackspace. Pipedrive utilizes a cloud load balancer that distributes traffic to application servers running the Sales Management website application. There is also a batch server which is used to run various scheduled jobs. Database services are provided by a MySQL database servers. The system utilizes a Cisco VPN communications server to establish an IPSec VPN tunnel between the Tallinn office and the New York office as well as the IPSec VPN tunnel from Tallinn and Tartu to Rackspace in Chicago. Backups are stored within the AWS US East region in S3. No connection between the Rackspace Chicago and AWS US East exists. The AWS environment houses the development, testing, and staging environments. The testing and staging environments share hardware and a load balancer. The development environment consists of one server which replicates all aspects of the production environment except for the production database contents.

People

People involved in the operation and use of the system are:

- The CEO, who is responsible for general oversight of the day–to–day operations of Pipedrive and the design of the corporate culture
- The CTO, who is responsible for oversight of the development team as well as project management and business analysis for the Sales Management application
- Developers and Business Analysts, who are responsible for the support and development of the Sales Management application
- Head of QE, who is responsible for quality assurance and system testing
- Head of Information Security (Governance, Risk, Compliance), who is responsible for security awareness and overall compliance

Procedures

Executive and Operations Management personnel maintain documented operating procedures involved in the operation of the Sales Management System:

- 3rd Party Tools Policy
- Acceptable Encryption Policy
- Access Control Policy
- Business Continuity Plan, Disaster Recovery
- Business Continuity Policy;
- Data Retention Policy
- Device Build and Configuration Management Policy
- Electronic Data Disposal Procedure
- Electronic Data Disposal Procedure;
- Incident Reporting and Response Policy
- Information Disposal Procedure
- Information Security Policy
- Information Security Policy
- Information Security Program Policy

- Infrastructure Security Policy
- Internal audit Procedure
- Physical Security Policy
- Risk Management Policy

Control activities have been placed into operation to help ensure that actions are carried out properly and efficiently. Control procedures serve as mechanisms for managing the achievement of control activities, and are a part of the process by which Pipedrive strives to achieve its business objectives. Pipedrive has applied a risk management approach to the organization in order to select and develop control procedures. After relevant risks have been identified and evaluated, controls are established, implemented, monitored, reviewed, and improved when necessary to meet the applicable trust services criteria and the overall objective of the organization.

The Pipedrive control procedures which have been designed to meet the applicable trust services criteria are included in section 4 of this report to eliminate the redundancy that would result from listing the procedures in this section as well.

Data

Pipedrive's Sales Management System provides CRM and sales management designed to help small sales teams manage intricate or lengthy sales processes. The Sales Management System was designed with the sales representatives in mind with tracking and reporting capabilities to help increase efficiency with the many customer relationships and sales data representatives are required to maintain. Some of the data maintained within Pipedrive's Sales Management System would include prospective clients' contact information, potential contract prices and realization, description of business, and much more. Access to customer data in Pipedrive's Sales Management System is restricted to appropriate IT personnel, approved customer personnel, and certain business partners.

System Boundaries

System boundaries, pertaining to collection, use, retention, disclosure, and disposal or anonymization or personalization of data, are governed by contract provisions for particular service engagements. Data is not utilized or disclosed to third parties outside of the scope allowed in such contracts and agreements.

Subservice Organizations

The Company utilizes subservice organizations to perform certain functions to improve operating and administrative effectiveness.

The accompanying description includes only relevant policies, procedures, and trust service criteria and activities of the Company and does not include policies, procedures, or trust services criteria and activities of the third party service organizations described below. The examination of

the Independent Service Auditors did not extend to policies, procedures, or trust services criteria and activities at the subservice organizations.

The following subservice organizations are used by Pipedrive for the following:

Service Provider	Nature of Service Provided
AWS	Infrastructure as a Service
Rackspace	Infrastructure as a Service

Pipedrive utilizes AWS and Rackspace for the network and system infrastructure services required to provide users' access to the Sales Management System. AWS and Rackspace are also responsible for providing physical and logical security controls and for reporting any security incidents relating to the security, availability, confidentiality, and privacy of Pipedrive's proprietary data. AWS and Rackspace have a current SOC report in place and available for review upon customer request.

The applicable trust services criteria that are intended to be met by controls at AWS and Rackspace, alone or in combination with controls at Pipedrive, and the types of controls expected to be implemented at AWS and Rackspace to meet those criteria are described in table below:

Control Activities Expected to be Implemented by AWS and Rackspace
AWS & Rackspace are responsible for restricting logical and physical access to data center facilities, backup media, and other system components including firewalls, routers, and servers.
AWS & Rackspace are responsible for implementing measures to prevent or mitigate threats consistent with the risk assessment.
AWS & Rackspace are responsible for maintaining segregation of Pipedrive's VM environments.
AWS & Rackspace are responsible for monitoring environmental conditions (temperature, fire, and water), leak detection, UPS battery life and capacity, and other key equipment to help maintain availability of services.

Control Environment

The control environment is determined by the control consciousness of an organization, which sets the tone of an organization and the way personnel conduct their activities, influencing how they carry out their control functions. This is the foundation for all other components of internal control, providing discipline and structure for the business operations.

The control environment at Pipedrive begins with management's philosophy and operating style as well as the priorities and direction provided by the Executive Management team. Pipedrive's

entire organization is dedicated to delivering the highest level of customer service. The Company has created a corporate culture that supports this mission.

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 the control environment, affecting the design, administration, and monitoring of other components. Integrity and ethical behavior are the products of the entity's ethical and behavioral standards, how they are communicated, and how they are reinforced in practice. 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, codes of conduct, and leadership's example.

Pipedrive has implemented, maintains, and regularly communicates a code of conduct and other policies regarding acceptable business practices, guidance on conflicts of interest and expected standards of ethical and moral behavior. Pipedrive's management conducts business dealings with employees, suppliers, customers, investors, creditors, competitors, agents, resellers, counsel, accountants, and auditors on a high ethical plane and insists others have similar business practices.

Commitment to Competence

Competence is the knowledge and skills necessary to accomplish tasks that define the individual's job. Commitment to competence includes management's consideration of the competence levels for particular jobs and how those levels translate into requisite skills and knowledge.

Pipedrive assigns job responsibilities to personnel based on the knowledge and skills needed to adequately perform each job. Pipedrive reinforces these responsibilities by providing hands-on training during the initial period of employment, and continual hands-on training for new business processes or job responsibilities.

Management's Philosophy and Operating Style

Management's philosophy and operating style encompass a broad range of characteristics. Such characteristics may include the following: management's approach to taking and monitoring business risk; management's attitude and actions for the security, availability, confidentiality, and privacy of information. Pipedrive's management takes a relatively conservative approach to information processing and risk associated with new business ventures.

Organizational Structure

An entity's organizational structure provides the framework for how entity-wide objectives are planned, executed, controlled, and monitored. A relevant organizational structure includes

considering key areas of authority and responsibility and appropriate lines of reporting. An entity develops an organizational structure contingent, in part, on its size and the nature of its activities.

The responsibilities of key positions within Pipedrive are clearly defined and communicated to personnel. Individuals that hold key positions are knowledgeable and experienced within the industry. Pipedrive's organizational structure supports communication of information both up to leadership, as well as down to support staff. Pipedrive's organizational structure is comprised of six primary business units that work together to deliver the Sales Management System services.

The six business units consist of:

- Executive Management – Responsible for providing execution of business objectives and strategic direction.
- Finance and Legal – Responsible for Pipedrive's contract management, including service billing.
- Development and Engineering – Responsible for frontend, backend, mobile development, Information/Cybersecurity and engineering of the Sales Management System.
- IT – Although technically under Engineering, IT can be viewed as an important business unit responsible for providing secure workstations and corporate network access used to access the Sales Management System. The IT department is tasked with maintaining appropriate security, availability, confidentiality, and privacy throughout the network to meet client SLAs that may be in place.
- Sales and Support – Responsible for developing and maintaining customer relationships. Provides analysis for new business prospects and new service offerings. Supports the Company's market position and brand/image management.
- HR – Responsible for conducting background and security checks on Pipedrive personnel prior to employment. HR provides a mandatory orientation program to employees that stresses the confidentiality of customer information through the new-employee orientation program they deliver.

Assignment of Authority and Responsibility

Assignment of authority and responsibility includes delegation of authority to deal with organizational goals and objectives, operating functions and regulatory requirements, including responsibility for information systems and authorizations for changes. Policies are established relating to business practices, knowledge, and experience required of key personnel and the appropriate number of people to carry out duties. In addition, management's policies and communications are directed at ensuring that personnel understand the entity's objectives, know how their individual actions interrelate and contribute to those objectives, and recognize how and for what they will be held accountable.

As mentioned above, Pipedrive has well defined job responsibilities and clear communication channels to disseminate information within the organization; this enables Pipedrive to react to market and regulation changes and to meet its goals and objectives. Pipedrive is appropriately

staffed to support its operations, particularly with respect to critical areas such as customer support and information technology system support.

Human Resource Policies and Practices

HR policies and practices relate to hiring, orientation, training, evaluating, counseling, and remedial action. Standards for hiring the most qualified individuals with emphasis on educational background, prior work experience, past accomplishments, and evidence of integrity and ethical behavior demonstrate Pipedrive's commitment to hiring and retaining only highly competent and trustworthy people. Personnel career growth and reward of meeting expectations are driven by periodic performance feedback and demonstrate Pipedrive's commitment to advance qualified personnel to higher levels of responsibility. Personnel who work for Pipedrive are required to read and acknowledge the Company's internal policies and Proprietary Information and Invention Agreement that includes the confidentiality of customer managed information. The confidentiality of customer and facility information is stressed during the new-employee orientation program and is also addressed in the employee handbook issued to each employee. New employees are given the necessary job training to meet the expectations of their position including security, confidentiality, and other compliance requirements.

Risk Assessment

Pipedrive's management performs periodic risk assessments, which require management to identify risks in its areas of responsibility and to implement appropriate measures to address those risks. Pipedrive's management reevaluates the risk assessment on a continual basis, but annually to both update the previous results and to identify any new potential areas of concern.

The risk assessment process consists of the following phases:

- Identifying – The identification phase includes listing out risks (including threats and vulnerabilities) that exist in the environment. This phase provides a basis for all other risk management activities.
- Assessing – The assessment phase considers the potential impact(s) of identified risks to the service organization and their likelihood of occurrence.
- Mitigating – The mitigation phase includes putting controls, processes, and other physical and virtual safeguards in place to prevent and detect both identified and assessed risks.
- Reporting – The reporting phase results in risk reports provided to managers with the necessary data to make effective business decisions and to comply with internal policies and any applicable regulations.
- Monitoring – The monitoring phase includes the performance of monitoring activities by Pipedrive's management team to evaluate whether the processes, initiatives, functions and/or activities are mitigating the risks as designed.

In-Scope Trust Services Categories

The table below provides the trust services categories within the scope of this report.

Trust Services Categories	Definition
Security	Information and systems are protected against unauthorized access, unauthorized disclosure of information, and damage to systems that could compromise the availability, integrity, confidentiality, and privacy of information or systems and affect the entity's ability to meet its objectives.
Availability	Information and systems are available for operation and use to meet the entity's objectives.
Confidentiality	Information designated as confidential is protected to meet the entity's commitments and system requirements.
Privacy	Personal information is collected, used, retained, disclosed, and disposed to meet the entity's commitments and system requirements.

Security

Security refers to the protection of

- Information during its collection or creation, use, processing, transmission, and storage and;
- Systems that use electronic information to process, transmit or transfer, and store information to enable the entity to meet its objectives. Controls over security prevent or detect the breakdown and circumvention of segregation of duties, system failure, incorrect processing, theft or other unauthorized removal of information or system resources, misuse of software, and improper access to or use of, alteration, destruction, or disclosure of information.

Availability

Availability refers to the accessibility of information used by the entity's systems, as well as the products or services provided to its customers. The availability objective does not, in itself, set a minimum acceptable performance level; it does not address system functionality (the specific functions a system performs) or usability (the ability of users to apply system functions to the performance of specific tasks or problems). However, it does address whether systems include controls to support accessibility for operation, monitoring, and maintenance.

Confidentiality

Confidentiality addresses the entity's ability to protect information designated as confidential from its collection or creation through its final disposition and removal from the entity's control in accordance with management's objectives. Information is confidential if the custodian (for example, an entity that holds or stores information) of the information is required to limit its access, use, and retention and restrict its disclosure to defined parties (including those who may otherwise have authorized access within its system boundaries). Confidentiality requirements may be contained in laws or regulations or in contracts or agreements that contain commitments made to

customers or others. The need for information to be confidential may arise for many different reasons. For example, the information may be proprietary, intended only for entity personnel.

Confidentiality is distinguished from privacy in that privacy applies only to personal information, whereas confidentiality applies to various types of sensitive information. In addition, the privacy objective addresses requirements regarding collection, use, retention, disclosure, and disposal of personal information. Confidential information may include personal information as well as other information, such as trade secrets and intellectual property.

Privacy

The privacy criteria are organized into eight categories:

- *Notice and communication of objectives.* The entity provides notice to data subjects about its objectives related to privacy.
- *Choice and consent.* The entity communicates choices available regarding the collection, use, retention, disclosure, and disposal of personal information to data subjects.
- *Collection.* The entity collects personal information to meet its objectives related to privacy.
- *Use, retention, and disposal.* The entity limits the use, retention, and disposal of personal information to meet its objectives related to privacy.
- *Access.* The entity provides data subjects with access to their personal information for review and correction (including updates) to meet its objectives related to privacy.
- *Disclosure and notification.* The entity discloses personal information, with the consent of the data subjects, to meet its objectives related to privacy. Notification of breaches and incidents is provided to affected data subjects, regulators, and others to meet its objectives related to privacy.
- *Quality.* The entity collects and maintains accurate, up-to-date, complete, and relevant personal information to meet its objectives related to privacy.
- *Monitoring and enforcement.* The entity monitors compliance to meet its objectives related to privacy, including procedures to address privacy-related inquiries, complaints, and disputes.

Trust Service Categories and Related Control Activities

Integration with Risk Assessment

Along with assessing risks, Pipedrive's management has identified and put into effect the necessary actions to address those risks. In order to address these risks, control activities have been placed into operation to help ensure that the actions are carried out in a competent and efficient manner. Control activities serve as various mechanisms for managing the achievement of the security, availability, confidentiality, and privacy principles and applicable criteria.

Information and Communication

Information

The Pipedrive Sales Management production SaaS System is entirely hosted within Rackspace. The Sales Management web application is a PHP and NodeJS application supported by infrastructure which is managed by Pipedrive and housed by Rackspace. The development environment is completely segregated and housed within the Tallinn office. Access to the production environment is tightly controlled and monitored through strict management of Rackspace security groups. Administrative access is restricted to appropriate personnel.

Communication

Management is involved with day-to-day operations and is able to provide personnel with an understanding of their individual roles and responsibilities. This includes the ability to provide necessary training to the extent that personnel understand how their daily activities and roles relate to the overall support of services. Pipedrive's management believes that open communication throughout the organization ensures that deviations from standards are identified, reported, and appropriately addressed.

Monitoring

Monitoring is generally performed through active, hands-on management, including weekly meetings to discuss operational issues. Executive Management is involved and active in the business. Pipedrive utilizes a risk-based approach to monitor business units and other entities throughout the organization, ensuring that enterprise-wide risks are prioritized and addressed in order of significance. Results from the risk evaluation are documented in formal communications to Executive Management and other relevant parties.

Pipedrive monitors customer communications and engagements through their customer support department. Client communications are received by the customer support department and are then disseminated throughout the Pipedrive organization.

Management strives to be proactive in responding to customer complaints and maintain a high level of inter-departmental communication about these events. Customer complaints and other issues are handled via the customer support department.