



Clear21



Clear21 Pty Ltd

SOC 3 for Service Organizations Report

1 December 2023 to 30 November 2024

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Section I

ASSERTION OF CLEAR21 PTY LTD
MANAGEMENT



ASSERTION OF CLEAR21 PTY LTD MANAGEMENT

7 January 2025

We are responsible for designing, implementing, operating, and maintaining effective controls within Clear21Pty Ltd's ('Clear21') iBodyshop, RepairConnection and Clear21 Assessing Software as a Service System (the 'System') throughout the period 1 December 2023 to 30 November 2024 to provide reasonable assurance that Clear21's service commitments and system requirements were achieved based on the trust services criteria relevant to Common Criteria/Security and Confidentiality ('Agreed Criteria') set forth in TSP section 100, 2017 Trust Services Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy, in the AICPA Trust Services Criteria. Our description of the boundaries of the system is presented in Clear21's Description of its System (the 'Description') 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 1 June 2023 to 31 May 2024 to provide reasonable assurance that Clear21's service commitments and system requirements were achieved based on the Agreed Criteria. Clear21's objectives for the system in applying the Agreed Criteria are embodied in its service commitments and system requirements relevant to the Agreed Criteria. The principal service commitments and system requirements related to the Agreed Criteria are presented in Clear21's Description of its System.

Clear21 uses Amazon Web Services ('AWS' or '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 Clear21, to achieve Clear21's service commitments and system requirements based on the Agreed Criteria. The Description presents Clear21's controls, the Agreed Criteria, and the types of complementary subservice organization controls assumed in the design of Clear21'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 are necessary, along with controls at Clear21, to achieve Clear21's service commitments and system requirements based on the Agreed Criteria. The Description presents Clear21's controls, the Agreed Criteria, and the complementary user entity controls assumed in the design of Clear21'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 1 December 2023 to 30 November 2024 to provide reasonable assurance that Clear21's service commitments and system requirements were achieved based on the Agreed Criteria.



Glendon Smith
Chief Operating Officer
Clear21 Pty Ltd

Section II

INDEPENDENT SERVICE
AUDITOR'S REPORT



INDEPENDENT SERVICE AUDITOR'S REPORT

To: Clear21 Pty Ltd

Scope

We have examined Clear21 Pty Ltd's ('Clear21') accompanying description of its iBodyshop, RepairConnection and Clear21 Assessing Software as a Service System (the 'Description') which has been prepared for the purposes of the independent assurance report.

Clear21 prepared the Description based on the following description criteria ('Description Criteria'):

- SOC 2: 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) with regards to the Description.

The Description is intended to provide report users with information about the Clear21 iBodyshop, RepairConnection and Clear21 Assessing Software as a Service System (the 'System') that may be useful when assessing the risks arising from interactions with Clear21's System. This includes the controls that Clear21 has designed, implemented, and operated to provide reasonable assurance that its service commitments and system requirements were achieved based on the following agreed criteria ('Agreed Criteria'):

- SOC 2: the trust services criteria relevant to Common Criteria/Security and Confidentiality (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).

Clear21 uses Amazon Web Services ('AWS' or '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 Clear21, to achieve Clear21's service commitments and system requirements based on the Agreed Criteria. The complementary subservice organization controls have been reviewed by Clear21 management. 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 includes complementary user entity controls that are necessary, along with controls at Clear21, to achieve Clear21's service commitments and system requirements based on the Agreed Criteria. The Description presents Clear21's controls, the Agreed Criteria, and the complementary user entity controls assumed in the design of Clear21's controls. The complementary user entity controls have not been assessed by our examination and remain the responsibility of those related entities to complete their own review.

Service Organization's Responsibilities

Clear21 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 Clear21's service commitments and system requirements were achieved. Clear21 has provided the accompanying assertion titled "Assertion of Clear21 Management" (the 'Assertion') about the Description and the suitability of the design and operating effectiveness of the controls described therein to provide reasonable assurance that the service commitments and system requirements would be achieved based on the Agreed Criteria. Clear21 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 Agreed Criteria and stating the related controls

in the Description; and identifying the risks that threaten the achievement of the Clear21's service commitments and system requirements.

Service Auditor's Responsibilities

Our responsibility is to express an opinion on the Description and on the suitability of the design and operating effectiveness of controls stated in the Description based on our examination. Our examination was conducted in accordance with AT-C 105 and AT-C 205 put forth by the Auditing Standards Board (ASB) of the American Institute of Certified Public Accountants (AICPA). 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.
- The controls stated in the Description were suitably designed.
- The controls stated in the Description were operating effectively throughout the period to provide reasonable assurance that Clear21's service commitments and system requirements were achieved based on the Agreed Criteria.

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 Clear21's System and the suitability of the design and operating effectiveness of controls involves the following:

- Obtaining an understanding of the System and Clear21'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.
- 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 Clear21 achieved its service commitments and system requirements based on Agreed Criteria.
- Testing the operating effectiveness of controls stated in the Description to provide reasonable assurance that Clear21 achieved its service commitments and system requirements based on the Agreed Criteria.
- Evaluating the overall presentation of the Description.

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 report users may consider important to meet their informational needs.

Because of the inherent limitations of any internal control structure, it is possible that, even if the controls are suitably designed and operating effectively, the control objectives may not be achieved and so fraud, error, or non-compliance with laws and regulations may occur and not be detected.

An assurance engagement on operating effectiveness of controls is not designed to detect all instances of controls operating ineffectively as it is not performed continuously throughout the period and the tests performed are on a sample basis. Any projection of the outcome of the evaluation of controls to future periods is subject to the risk that the controls may become inadequate because of changes in conditions, or that the degree of compliance with them may deteriorate.

Opinion

In our opinion, management's assertion that the controls within Clear21's System were effective throughout the period 1 December 2023 to 30 November 2024, to provide reasonable assurance that Clear21's service commitments and system requirements were achieved based on the Agreed Criteria is fairly stated, in all material aspects.



AssuranceLab CPAs LLC
Austin, Texas
United States
7 January 2025

Section III

CLEAR21 PTY LTD'S DESCRIPTION OF
ITS SYSTEM



OVERVIEW OF OPERATIONS

Company Background

Clear21 Pty Ltd ('Clear21') was founded in 1996 as a software company dedicated to streamlining business processes through efficient, affordable, reliable, and secure technologies that will stand the test of time, ultimately aiming to deliver measurable and sustainable improvements that enhance both business success and customer satisfaction.

Clear21 serves a diverse range of industries, with a particular focus on automotive smash repair, parts pricing, and motor vehicle assessing services. The company's commitment to innovation and quality has positioned it as a trusted partner within these sectors.

Description of Services Provided

Clear21 provides a comprehensive software-as-a-service system that encompasses three distinct products designed to meet its customers' varied needs. These products are tailored to enhance operational efficiency and effectiveness within the industries served.

iBodyshop

iBodyshop offers a holistic suite of robust, cloud-based tools ensuring that user data always remains secure and accessible. iBodyshop includes a wide range of functionalities designed specifically for automotive smash repair shops, enabling seamless management of the repair processes from start to completion. Key features include estimation calculations, detailed job management and oversight of workshop operations, such as scheduling and time tracking. Furthermore, the product incorporates parts inventory management and fully integrated accounting capabilities, enhancing overall efficiency. iBodyshop also boasts connectivity with third-party assessing, accounting, and parts supply systems, making it a versatile and indispensable tool for modern repair shop operations. Accessible both on desktop and through mobile download, iBodyshop stands out as a comprehensive solution tailored to meet the unique needs of the automotive repair industry.

RepairConnection

Acting as a dynamic parts marketplace, RepairConnection allows suppliers to engage in various activities, including quoting and directly supplying parts to repairers. This innovation leads to improved turnaround times and heightened customer satisfaction. Designed to optimize the management of pricing, purchase orders, and invoices with precision, it features real-time updates and notifications, ensuring that users remain informed about necessary actions. The platform provides an intuitive workflow that simplifies inventory tracking and order management, empowering users to achieve greater efficiency with minimal effort.

Clear21 Assessing

Clear21 Assessing is a modern solution tailored to alleviate the workload of insurance claims assessors, significantly enhancing the assessment workflow for contract-assessing firms and insurers. With its intuitive and visually appealing interface, the product fosters measurable improvements in productivity and efficiency. Notable features, such as Service Level Agreements (SLAs) and Repair & Booking Updates, minimize the need for prolonged phone calls to verify assessment statuses, thereby streamlining the claims and assessing process. Ultimately, Clear21 Assessing equips contract assessing firms and insurers with the essential tools to conduct and authorize insurance claims effectively, ensuring that evaluations are performed accurately.

In summary, Clear21's suite of products is strategically developed to address the unique challenges faced by industry stakeholders, thereby reinforcing the company's commitment to delivering high-quality, impactful software solutions that maintains high levels of security and privacy.

Principal Service Commitments and System Requirements

Clear21 has established processes, policies, and procedures to meet its objectives related to its System. Those objectives are based on the purpose, vision, and values of Clear21 as well as commitments that Clear21 makes to user entities, the requirements of laws and regulations that apply to Clear21's activities, and the operational requirements that Clear21 has established.

Commitments are documented, and communicated in customer agreements, as well as in public descriptions of the System. The operational requirements are communicated in Clear21's processes, policies and procedures, system design documentation, and customer agreements. This includes policies around how the System is designed and developed, how the System is operated, how the system components are managed, and how employees are hired, developed, and managed to support the System.

Components of the System

Infrastructure

Clear21's primary infrastructure used to provide the System includes the cloud hosted networking, compute and database components of Amazon Web Services ('AWS').

System	Type	Description
Amazon Elastic Compute Cloud (EC2)	Cloud Compute	Secure and resizable compute capacity (virtual servers) in the cloud.
Amazon Elastic Container Service (ECS)	Cloud Compute	Secure, reliable, and scalable service to run containers.
AWS Lambda	Cloud Compute	Serverless, event-driven compute service.
AWS Fargate	Cloud Compute	Serverless compute for containers.
Amazon Aurora	Data Storage	Relational database service.
Amazon Simple Storage Service (S3)	Data Storage	Object, file, and block storage.
Amazon Elastic File System (EFS)	Data Storage	Object, file, and block storage.
AWS Network Firewall	Network Firewall	Managed service to deploy network protections for Amazon Virtual Private Clouds (VPCs).
Sophos Firewall	Network Firewall	Network traffic monitoring, protection and management service.
AWS Elastic Load Balancing (ELB)	Networking	Automatically distributes incoming application traffic across multiple targets.

System	Type	Description
Amazon Route 53	Networking	Domain Name System (DNS) registration and routing service.
AWS CloudFront	Content Delivery Network	Low-latency, global delivery of content.
AWS Certificate Manager	Encryption	A service to provision, manage, and deploy public and private Secure Sockets Layer/Transport Layer Security (SSL/TLS) certificates for use with AWS services.
AWS Key Management Service	Key Management	Centralized control over the cryptographic keys used to protect data.

Software

Primary software is used to support Clear21's System.

Software	Purpose
iBodyshop, RepairConnection, Clear21 Assessing	The Software as a Service System provided to Clear21 customers.
AWS CloudTrail	Enables auditing, security monitoring, and operational troubleshooting by tracking user activity and API usage on AWS.
AWS CloudWatch	Monitoring and management service that provides data and actionable insights for AWS, hybrid, and on-premises applications and infrastructure resources.
AWS GuardDuty	Threat detection service that continuously monitors AWS accounts and workloads for malicious activity and delivers detailed security findings for visibility and remediation.
AWS Security Token Service	A web service to request temporary, limited-privilege credentials for AWS Identity and Access Management (IAM) users or for federated users.
Microsoft Entra ID	Authentication software used to identify and authenticate users for access control to the systems.
GitHub	Source code repository used to manage the software code and version control.
TeamCity	Continuous integration / continuous delivery software used to manage the pipeline of change release testing and deployment.
1Password	Enterprise password manager used to store authentication secrets and strengthen password security.
Intune	Mobile device management software used to track and manage security policies on endpoint devices.

Software	Purpose
Microsoft Defender, ESET	Anti-virus software used to protect endpoint devices from malware.
BitLocker	Full volume encryption tool used to protect data from theft or unauthorized access.
Datadog	System monitoring software used to log events and raise alerts to support system security and availability. Includes vulnerability scanning software to identify, log and resolve technical vulnerabilities.
Jira, Zendesk	Ticketing software used to log events and requirements to support the internal controls.
Pipedrive	Customer relationship management system and pipeline management tool used to support the sales management activities.
ELMO	Human resources information system used to manage employee processes like onboarding, offboarding and performance.
Confluence	Content collaboration and management workplace built for teams.
Slack	Communication software used to facilitate real-time communication in the form of text chat or voice chat within the company and with external parties.
Office 365	Microsoft's suite of enterprise productivity, collaboration, and communication tools.

People

Clear21 has 60 people that are organized into the following functional areas:

- **Leadership:** The executive level is responsible for corporate governance.
- **Product:** Responsible for managing the roadmap of requirements and balancing the Engineering team priorities.
- **Engineering:** Responsible for building and maintaining the infrastructure and software.
- **Customer Success:** Responsible for the customer experience, support and services.
- **Operations:** Responsible for monitoring and supporting robust and effective company and system operations.
- **Risk and Compliance:** Responsible for identification, assessment, treatment and monitoring to manage risks and support compliance.
- **Sales:** Responsible for onboarding new customers and aligning requirements.
- **Marketing:** Responsible for branding, market positioning and attracting customers.

Data

The data collected and processed by Clear21 includes the following types:

- **Basic personal details:** name, email, contact details.
- **User activity:** user activity within the software.
- **Financial account information:** account balances, transactions.

- Business information: proprietary data of business activities and property.

Processes, Policies and Procedures

Processes, policies, and procedures are established that set the standards and requirements of the System. All personnel are expected to comply with Clear21's policies and procedures that define how the System should be managed. The documented policies and procedures are shared with all Clear21's employees and can be referred to as needed.

Physical Security

The critical infrastructure and data of the System are hosted by AWS. There are no trusted local office networks. As such, AWS is responsible for the key physical security controls that support the System.

Logical Access

Clear21's logical access processes restrict access to the infrastructure, software, and data to only those that are authorized for access. Access is based on the concept of least privilege that limits the system components and access privileges to the minimum level required to fulfil job responsibilities.

The in-scope systems require approval and individual authentication practices prior to gaining access. Microsoft Entra ID authentication software is used for identity management and single sign on. Access management processes are followed to ensure new and modified access is approved, terminated users access is removed, and access rights are reviewed annually and adjusted when no longer required. Additional information security policies and procedures require Clear21 employees to use the systems and data in an appropriate and authorized manner.

Automated and manual security practices are used to protect the perimeter security and network to prevent unauthorized access attempts and tampering from third-party actors with malicious intent. Those include applying encryption of data and communications, continuous testing for and remediation of technical vulnerabilities and applying network controls like firewalls and event monitoring to prevent and detect unauthorized activity.

Clear21 employee workstations are required to follow defined security practices to mitigate the risks of data leakage and malware that may compromise the devices, system access and sensitive data. Intune mobile device management software is used to monitor, systematically enforce device requirements, and provide remote management capabilities for the workstations.

System Operations

Backup and restoration procedures for the System are defined and followed. The System is monitored through a combination of automated and manual processes to prevent and detect any issues with the infrastructure, software, and data. Alerts and logs are monitored with incident management processes defined for handling and resolving adverse events.

Clear21's critical infrastructure and data are hosted by AWS with multiple availability zones to provide failover capability in the event of an outage of one of the data centers. Redundancy, disaster recovery in continuity considerations are built into the system design of AWS to support Clear21's availability objectives. These are supported by the system monitoring, incident management processes and defined recovery and continuity plans.

Change Control

Clear21 operates a defined process for software development with supporting policies and procedures. Change requests and requirements are logged and prioritized for development. Changes include those related to functionality improvements, bug fixes, security and reliability-related enhancements, and other updates to the iBodyshop, RepairConnection and Clear21 Assessing software to support Clear21's System and objectives.

Separate environments are used to support development and testing activities in isolation from the production environment. GitHub version control software is used for the code repository that tracks all changes to the iBodyshop, RepairConnection and Clear21 Assessing software, including managing versions and roll-back capability in the event of a failed change release. A continuous integration / continuous deployment (CI/CD) pipeline is configured using TeamCity to enforce key process steps and checks prior to new versions of the code base being deployed into the production environment. Changes to the infrastructure configurations and settings are managed as code, subject to the same process steps and checks prior to impacting the production environment.

Data Governance

Clear21 uses data to support the System objectives and services. An approach to effective data governance has been established to understand and communicate the data that's used in the System, the objectives and requirements of that data, and the commitments of Clear21.

Established processes, policies, procedures define the operational requirements for data governance, including how data is classified, handled, and used by the System in supporting the objectives and services.

Boundaries of the System

The scope of this report includes the iBodyshop, RepairConnection and Clear21 Assessing Software as a Service System (the 'System'). This report does not include the cloud hosting services provided by Amazon Web Services ('AWS').

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

Control Environment

Integrity and Ethical Values

The effectiveness of controls is dependent on the integrity and ethical values of the people who implement, manage, and monitor them. Integrity and ethical values are important foundations of Clear21's control environment, affecting the design, implementation, and monitoring of the controls. Integrity and ethical behavior are supported by Clear21's culture, governance, hiring and onboarding practices, ethical and behavioral standards, the way those 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 and codes of conduct, as well as by example.

Commitment to Competence

Clear21's competence of employees includes the knowledge and skills necessary to accomplish employees' roles and responsibilities, in support of Clear21's objectives and commitments. Management's commitment to competence includes careful consideration of the competence levels required for each role, the requisite skills, knowledge, and experience, and the actual performance of individuals, teams and the company as a whole.

Management's Philosophy and Operating Style

Clear21's management philosophy and operating style is a purpose-driven, risk-based approach to pursuing the company objectives and satisfying Clear21's commitments. Risk taking is an essential part of pursuing the objectives. A formal approach is taken to understanding those risks and being deliberate about which risks are acceptable, and where risk mitigation actions are required.

Organizational Structure and Assignment of Authority and Responsibility

Clear21's organizational structure provides the framework within which its activities for achieving the objectives are planned, executed, managed, and monitored. An organizational structure has been developed to suit Clear21's needs and is revised over time as the company grows and requirements change. Roles and responsibilities are further established and communicated through documented policies, and job descriptions, as part of individual performance review processes, reviewing and communicating team and functional performance, and the various operational team and governance meetings.

Human Resource Policies and Practices

Clear21's employees are the foundation for achieving the objectives and commitments. Clear21's hiring, onboarding and human resource practices are designed to attract, develop, and retain high-quality employees. That includes training and development, performance evaluations, compensation, and promotions, providing personal support and perks for individuals, recognizing team and company success, and building a culture of alignment to a shared purpose and vision. It also includes disciplinary processes and business planning to avoid single-person dependencies to ensure the objectives and commitments are not reliant on individuals.

Risk Assessment Process

Risk Assessments

Clear21's risk assessment process identifies and manages risks that threaten achievement of the objectives and commitments. This includes risks that may affect the security, reliability or integrity of the services provided to user organizations and other interested stakeholders.

A formal process is followed to identify, assess, treat, and monitor the risks to ensure the risks are aligned to the risk appetite and objectives of Clear21, and mitigated or avoided where appropriate. Risks identified in this process include:

- Operational risk – changes in the environment, staff, or management personnel, reliance on third parties, and threats to security, reliability, and integrity of Clear21's operations.
- Strategic risk – new technologies, changing business models, and shifts within the industry.
- Compliance – legal and regulatory obligations and changes.
- Financial – the sustainability of Clear21 and resources supporting the objectives.

These risks are identified by Clear21 management, employees, and third-party stakeholders, and updated in the risk register as a single source of monitoring the risks. The formal risk assessments ensure the ongoing commitment of management, and support completeness and an evolving view of the risk landscape in Clear21's context.

Integration with Risk Assessment

Established internal controls include Clear21's policies, procedures, automated system functions and manual activities. The controls are designed and implemented to address the identified risks, and to meet the obligations and criteria set by laws, regulations, customer commitments and other compliance obligations. The controls follow a continual improvement methodology in consideration of the costs and benefits of such control improvements and recognizing the changing landscape and requirement of those controls as Clear21 grows, and the associated risks change

Information and Communications Systems

Information and communication are a core part of Clear21'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 Clear21's operations effectively. The information and communication systems consider the internal control requirements, operating requirements, and the needs of interested parties including employees, customers, third-party vendors, regulators, and shareholders.

The information and communication systems include central tracking systems that support Clear21's established processes, as well as various meetings, and documented policies, procedures, and organizational knowledge.

Monitoring Controls

Management monitors the controls to ensure that they are operating as intended and that controls are modified and continually improved over time. Leadership, culture, and communication of the controls are important enablers to the effectiveness of the controls in practice. This ensures buy-in amongst the employees and empowers Clear21's team and individuals to prioritize the performance and continual improvement of the controls. Evaluations are performed during the course of business, in management reviews, and by independent auditors to assess the design and operating effectiveness of the controls. Deficiencies that are identified are communicated to responsible control owners to agree remediation actions or re-enforce the control requirements and importance. Corrective actions are tracked with agreed timelines and ownership for remediation with ownership of management and the Board, for ensuring appropriate actions are completed in a timely manner.

Changes to the System in the Last 12 Months

No significant changes have occurred to the services provided to user entities in the 12 months preceding the end of the examination period.

Incidents in the Last 12 Months

No significant incidents have occurred to the services provided to user entities in the 12 months preceding the end of the examination period.

Criteria Not Applicable to the System

All Common Criteria/Security and Confidentiality Trust Services Criteria were applicable to Clear21's System.

COMPLEMENTARY SUBSERVICE ORGANIZATION CONTROLS

This report does not include the cloud hosting services provided by Amazon Web Services ('AWS').

Subservice Description of Services

AWS provides a highly reliable, scalable, low-cost infrastructure platform in the cloud that powers hundreds of thousands of businesses in 190 countries around the world. With data center locations in the U.S., Europe, Brazil, Singapore, Japan, and Australia.

Complementary Subservice Organization Controls

Clear21's services are designed with the assumption that certain controls will be implemented by subservice organizations. Such controls are called complementary subservice organization controls. It is not feasible for all of the Agreed Criteria related to Clear21's services to be solely achieved by Clear21 control procedures. Accordingly, subservice organizations, in conjunction with the services, should establish their own internal controls or procedures to complement those of Clear21.

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

Subservice Organization – Amazon Web Services		
Category	Criteria	Control
Common Criteria/ Security	CC6.1- CC6.8	Logical access measures are established and followed to ensure access to systems and data is restricted to authorized personnel with technical safeguards and ongoing assessments to reduce the risk of system and data breaches.
	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 data centers is reviewed on a quarterly basis by appropriate personnel.
		Physical access points to server locations are recorded by closed circuit television camera ('CCTV'). 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 intrusion detection systems are installed within data server locations to monitor, detect, and automatically alert appropriate personnel of security incidents.	
CC7.1- CC7.5	Incident management and response policies and procedures are established and followed to identify, analyze, classify, respond to and resolve adverse events.	
CC8.1	Formal processes are established and followed to ensure system changes are documented, tracked, prioritized, developed, tested and approved prior to deployment into production.	

Clear21 management, along with the subservice organization, define the scope and responsibility of the controls necessary to meet all the relevant Agreed Criteria through written contracts and published terms of

service. In addition, Clear21 performs monitoring of the subservice organization controls by reviewing attestation reports and monitoring the performance of the subservice organization controls.



COMPLEMENTARY USER ENTITY CONTROLS

Clear21'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 Agreed Criteria related to Clear21's services to be solely achieved by Clear21 control procedures. Accordingly, user entities, in conjunction with the services, should establish their own internal controls or procedures to complement those of Clear21's.

The following complementary user entity controls should be implemented by user entities to provide additional assurance that the Agreed 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.

User entities are responsible for:

- Understanding and complying with Clear21's terms of service.
- Notifying Clear21 of changes made to technical or administrative contact information.
- Administering their users' access rights including approval, removal, and periodic review to ensure access is appropriate.
- Ensuring multi-factor authentication is applied by personnel, if required.
- Performing any required risk assessments and approvals when using pre-built integrations available with Clear21's services.
- Performing any required risk assessments and approvals for using Clear21's open application programming interface (API), and notifying Clear21 of any identified vulnerabilities, security breaches or system failures when using the APIs.
- Ensuring the supervision, management, and control of the use of Clear21's services by their personnel.
- Developing their own disaster recovery and business continuity plans that address the inability to access or utilize Clear21 services for any critical reliance on these services.
- Immediately notifying Clear21 of any actual or suspected information security breaches or system failures.



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