CONNECTWISE™

ConnectWise, LLC

Control, Automate, and Recover Systems

System and Organization Controls (SOC) for Service Organizations Report
for the period of January 1, 2022 to June 30, 2022

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Report of Independent Service Auditors issued by Aprio LLP

Table of Contents

I. Report of Independent Service Auditor

We have examined ConnectWise, LLC's (the "Company" or "ConnectWise") accompanying assertion titled *ConnectWise, LLC's Assertion* (the "Assertion") indicating that the controls within the Control, Automate, and Recover Systems (the "System') were effective for the period of January 1, 2020 to June 30, 2022 (the "Specified Period"), to provide reasonable assurance that ConnectWise'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*).

The Company uses the subservice organizations noted in Subservice Organizations table. Certain AICPA Applicable Trust Services Criteria specified in the section titled *ConnectWise, LLC's Description of the Boundaries of its System*, under the section *Subservice Organizations*, can be achieved only if complementary subservice organization controls assumed in the design of the Company's controls are suitably designed and operating effectively, along with related controls at the Company. Management's Assertion includes only the controls of the Company and excludes the controls performed by the subservice organization. The Assertion does not disclose the actual controls at the subservice organizations. Our examination did not include the services provided by the subservice organizations, and we have not evaluated the suitability of the design or operating effectiveness of such complementary subservice organization controls.

The Assertion indicates that certain AICPA Applicable Trust Services Criteria specified in the section titled *ConnectWise, LLC's Description of the Boundaries of its System*, under the section *User Entity Controls*, can be achieved only if complementary user entity controls contemplated in the design of the Company's controls are suitably designed and operating effectively, along with related controls at the Company. Our examination did not extend to such complementary user entity controls, and we have not evaluated the suitability of the design or operating effectiveness of such complementary user entity controls.

Service Organization's responsibilities

The Company 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 the Company's service commitments and system requirements were achieved. The Company has provided the accompanying assertion titled *ConnectWise, LLC's Assertion* about the suitability of design and operating effectiveness of controls. When preparing its assertion, the Company 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 Auditor's responsibilities

Our responsibility is to express an opinion, based on our examination, on whether management's assertion that the 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 the controls were not effective to achieve the Company's service commitments and system requirements based on the Applicable Trust Services criteria; and
- Performing procedures to obtain evidence about whether controls within the system were effective to achieve the Company'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.

Other matters

We did not perform any procedures regarding the fairness of presentation as it relates to the description criteria of the description in Section III titled *ConnectWise, LLC's Description of the Boundaries of its System*, and, accordingly, do not express an opinion thereon.

Opinion

In our opinion, ConnectWise's assertion that the controls within the Company's System were effective throughout the Specified Period to provide reasonable assurance that the Company's service commitments and system requirements were achieved based on the Applicable Trust Services Criteria, in all material respects, is fairly stated.

Aprio, LLP

Aprio, LLP

Atlanta, Georgia
September 20, 2022

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II. ConnectWise, LLC’s Assertion

We are responsible for designing, implementing, operating, and maintaining effective controls over ConnectWise, LLC’s (the “Company” or “ConnectWise”) Control, Automate, and Recover Systems (the “System”) for the period of January 1, 2022 to June 30, 2022 (the “Specified Period”), to provide reasonable assurance that the Company’s service commitments and system requirements relevant to Security, Availability, Confidentiality, and Privacy were achieved. We have performed an evaluation of the effectiveness of the controls within the System throughout the Specified Period to provide reasonable assurance that the Company’s service commitments and system requirements were achieved based on the trust services criteria relevant to Security, Availability, Confidentiality, and Privacy (the “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*). The Company’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 specified in the section titled *ConnectWise, LLC’s Description of the Boundaries of its System*.

The Company uses the subservice organizations noted in Subservice Organizations table. Certain AICPA Applicable Trust Services Criteria specified in the section titled *ConnectWise, LLC’s Description of the Boundaries of its System*, under the section *Subservice Organizations*, can be achieved only if complementary subservice organization controls assumed in the design of the Company’s controls are suitably designed and operating effectively, along with related controls at the Company. Management’s assertion includes only the controls of the Company and excludes the controls performed by the subservice organizations.

Certain AICPA Applicable Trust Services Criteria, specified in Section III, *ConnectWise, LLC’s Description of the Boundaries of its System*, under the section *User Entity Controls* can be achieved only if complementary user entity controls contemplated in the design of the Company’s controls are suitably designed and operating effectively, along with related controls at the Company. Management’s assertion includes only the controls of the Company and excludes the controls performed by User Entities.

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 Specified Period to provide reasonable assurance that the Company’s service commitments and system requirements were achieved based on the Applicable Trust Services Criteria.

III. ConnectWise, LLC's Description of the Boundaries of its System

A. Scope and Purpose of the Report

This report describes the control structure of ConnectWise, LLC (the "Company" or "ConnectWise") as it relates to its Control, Automate, and Recover Systems (the "System") for the period of January 1, 2022 to June 30, 2022 (the "Specified Period"), for the trust services criteria relevant to Security, Availability, Confidentiality, and Privacy (the "Applicable Trust Services Criteria") as set forth in TSP section 100, *2017 Trust Services Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy* (AICPA, *Trust Services Criteria*).

It is the responsibility of each specified party to evaluate this information in relation to the control structure in place at the user organization to assess the total internal control environment. The internal control structures at the Company are not designed to compensate for any weaknesses that may exist if the internal control structure at a user organization is ineffective.

B. Company Overview and Background

Company Overview

ConnectWise is an IT software company, powering Technology Service Providers (TSP) to achieve their vision of success in their as-a-service business with intelligent software packages, expert services, and vast eco-system of integration. ConnectWise has unmatched flexibility which caters profitable long-term growth to TSPs.

ConnectWise develops and distributes a business management platform. The Company offers a suite of applications that includes an integrated customer relationship management (CRM) solution, help desk and customer service applications, project management, finance and billing systems, and a workflow automation solution. ConnectWise software caters to information technology services, system integration, software development, professional services, and telecommunications sectors. The Company was founded in 1982 and is based in Tampa, Florida.

ConnectWise Office Locations

- Head Office - Tampa:
  400 N Tampa St #2600
  FL 33602, United States

- Operations – India:
  - Bangalore, India
  - Mumbai, India
  - Pune, India

Overview of the Control System

Control is a remote desktop support software application that is hosted by ConnectWise in its virtual private cloud environment. The application is set up in a multi-instance SaaS architecture that allows for a high degree of customization and security management by the primary user including the ability to limit access to the instance by network address. Control has an open architecture structure that can be utilized by users to implement custom plugins, scripting, or various integrations.

A typical use model would start with a host initiating a session through the central web application. A participant would then join a session by clicking on an email link or via the guest page of the application. An unattended client can be created and deployed to a targeted machine without the need for human intervention. Most commonly expected features for a product in this arena are present. Examples include reboot and reconnect, drag and drop file transfer, screen recording, safe mode support, multiple monitors, command line access, wake-on-LAN, VoIP, chat, and a custom toolbox for quick deployment of support tools. In addition to features that facilitate communication, Control also offers complete control over branding and customization of the product design, logo, color scheme, icons, text strings, and localization.

Control Software as a Service provides the following services to partners:

- *Ad Hoc support* – The agent provides a code or link to connect. This is a non-persistent connection. Once the session is over the link or access is no longer available. There is no agent installed. There is an executable, but it is not an installation. The executable runs at the user level to establish the user connection.
- *Screen sharing* – This method of connecting is simply, sharing the screen of the user needing support. A link is provided to the user with a code and a package file is downloaded or executed. This is not a peer-to-peer connection. This connection goes through a server over a secure connection.
- *Agent based support session* – This method of connection is agent based. An administrator typically sets this up. This is generally used by internal IT. With the agent installed the IT support group has the ability to connect to the user's machine and control it for support.

Overview of the Automate System

Automate SaaS is a remote management and monitoring tool that allows partners to manage asset inventories, patching, scripting, software deployments and monitoring at multiple locations in real-time. Once installed, the central web application can be made visible inside and outside of the local area network (LAN). ConnectWise Automate has an open architecture structure that can be utilized by users to implement custom plugins, scripting, or various integrations.

Automate provides visibility by allowing partners to dynamically audit hardware and software across major Windows, Linux, and Apple platforms. In addition, automate allows partners to deploy patches, scripts, and software updates automatically, keeping systems current as changes occur. The monitoring function of Automate provides partners with the ability to proactively monitor and support users and devices with an integrated search tool. Automation of recurring tasks with Automate allows IT personnel to spend time on higher priorities.

Automate Software as a Service provides the following services to partners:

- *Network Discovery* – Allows partners to scan their networks to audit both hardware and software assets.
- *Automation* – Allows partners to automate recurring tasks, such as patch deployment, scripting, and software updates.
- *Monitoring* – Allows partners to proactively support users by pre-emptively addressing issues before they become outages.

Overview of the Recover System

With ConnectWise Recover, users can avoid downtime and disruption for their clients with a reliable and secure Backup and Disaster Recovery (BDR) solution.

Recover is ConnectWise's fully managed backup and disaster recovery platform. Designed to access client backup data quickly while maintaining recovery point's offsite Recover combines a local, onsite appliance with offsite cloud storage to provide a comprehensive hybrid backup solution. Backed by automation and our 24/7/365 NOC services, ConnectWise Recover keeps the client's data safe—and the business intact.

- *ConnectWise Recover Continuity* – Avoid downtime and recover lost data in minutes, not days. ConnectWise Recover Continuity is an enterprise-grade BDR solution that provides speed, reliability and continuous uptime for client data protection.

- *ConnectWise Recover Backup* – For companies with simple, straightforward data backup needs, ConnectWise Recover Backup offers flexible, scalable, and budget-friendly data protection.
- *ConnectWise Recover SaaS* – ConnectWise Recover SaaS allows you to easily protect your clients' data for the SaaS apps from a single screen.
- *ConnectWise Recover complete BDR* – With ConnectWise Recover complete BDR, you can avoid downtime and disruption for your clients with our reliable and secure Backup and Disaster Recovery (BDR) solution. Backed by automation and our 24/7/365 NOC services, ConnectWise Recover complete BDR keeps your client's data safe—and your business intact.

C. System Overview

1. Infrastructure and Software

Control is a cloud-based multi-instance SaaS application that is hosted solely in AWS. Partner solutions are housed in their own instances, making this a multi-instance solution as opposed to multi-tenant which is common in cloud architecture. The following describes the in-scope components supporting the Control SaaS system:

System/Application	Description	Infrastructure
Control	Remote-control software	Windows Server 2016. Each server can have up to 800 instances. Each instance has a SQLite database, a proprietary webserver as relay service session manager.

Automate is a cloud-based multi-instance SaaS application that is hosted in AWS. Each partner's solution is housed in their own instance, making this a multi-instance solution as opposed to multitenant which is common in cloud architecture. The following describes the in-scope components supporting the Automate system:

System/Application	Description	Infrastructure
Automate	Remote Management and Monitoring Application	Windows Server /2016, IIS, and MySQL database.

Recover is a fully managed backup and disaster recovery platform. Designed to access client backup data quickly while maintaining recovery point's offsite Recover combines a local, onsite appliance with offsite cloud storage to provide a comprehensive hybrid backup solution. The following describes the in-scope components supporting the Recover system:

System/Application	Description	Infrastructure
Recover	Data protection (Backup and Restore/Recovery), backup data management software and appliance.	• Ubuntu 20.04 Server appliance. • Agent Application support almost all Windows & Linux flavors. • Cloud Integration – Ubuntu Server Appliances running in IBM SoftLayer cloud.

The ConnectWise internal network is protected from public internet traffic via stateful inspection firewalls managed by the IT Team. These firewalls are configured to deny all traffic and only allow specific services to a specific destination. Access to administer the firewalls is restricted to personnel in the Cloud Infrastructure group and is commensurate with their job responsibilities. Custom rules are added that govern the allowed inbound traffic to ConnectWise resources. All other inbound traffic is denied. Rules can be modified as needed and new rules are automatically enforced for all existing and future resources.

Encrypted communications are utilized to protect remote internet sessions to the ConnectWise applications and internal network. Encryption is used to help ensure the privacy and integrity of the data being passed over the public network.

Network Security

ConnectWise manages the network security services for their cloud environment. The production infrastructure resides within AWS, Markley, and IBM SoftLayer data centers in multiple availability zones. Partners only have access to their instance. Remote access to the production network for the Control, Automate, and Recover Systems is granted via encrypted VPN client. A demilitarized zone (DMZ) is implemented in the cloud-hosted environment to limit inbound traffic from the internet to externally facing production servers while restricting direct access to back-end services. Internal or external web application testing is performed annually to detect new and unknown vulnerabilities. Remediation of all critical/high vulnerabilities is tracked within a ticketing system, and a policy is in place for timely remediation of any critical/high noted vulnerabilities.

Security commitments to user entities are documented and communicated in Terms and Conditions and other partner agreements, as well as in the description of the service offerings provided online. Security commitments are standardized and include, but are not limited to, the following:

- Use of encryption technologies to protect partner data stored and in transit; and
- Role-based access controls to limit user access to sensitive data.

Security groups are used to provide security at the protocol and port level and are configured to explicitly filter traffic coming into and out of the cloud-hosted environment. A DMZ is implemented in the cloud-hosted environment to limit inbound traffic from the internet to externally facing production servers while restricting direct access to back-end services. The credential and user web interfaces are secured using encryption techniques (HTTPS). ConnectWise's management establishes operational requirements that support the achievement of security commitments, relevant laws and regulations, and other system requirements. Such requirements are communicated through ConnectWise's system policies and procedures, system design documentation, and contracts with partners. 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.

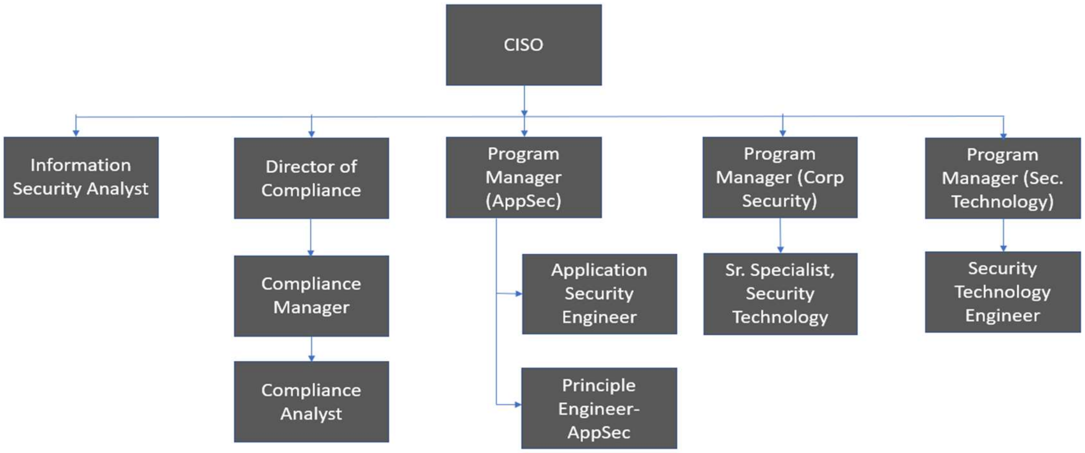
Anti-virus is utilized for servers and is centrally managed and configured for real-time protection and to log and report on metrics such as online status and malicious software detection.

2. People

ConnectWise has a staff of approximately 2,700 employees organized as executives, senior operations staff, and Company administrative support staff, such as legal, compliance, accounting, finance, human resources. Key roles in the Company are:

- Chief Executive Officer (CEO) – The CEO of ConnectWise serves as the leader behind the growth and creation of the ConnectWise platform and community. The CEO is focused on expanding ConnectWise through their suite of solutions.
- Chief Legal Officer (CLO) – The CLO are responsible for all legal matters relating to business operations.
- EVP & GM, Product Management – The EVP & GM oversees product management and development of the ConnectWise platform portfolio. The EVP & GM is responsible for strategic product direction. It includes product vision, product innovation, product design, product development, project management, and product marketing of ConnectWise products.

- Chief People Officer (CPO) – The CPO has the responsibility of finding and developing ConnectWise personnel and helping individuals grow to meet their career goals. The CPO is also responsible for identifying and executing best practices in human resources and talent management as well as serving as in-house expert and strategic advisor on all human resources and talent-related issues.
- Chief Information Security Officer (CISO) – The Information Security Officer is responsible for ConnectWise's overall security strategy, including identifying and implementing security practices, policies, and solutions, and recommending best practices for infrastructure and application security. The Information Security Director will also act as a thought leader within the Company, keeping colleagues and the executive leadership team educated on all matters related to security.


CISO
Information Security Analyst
Director of Compliance
Compliance Manager
Compliance Analyst
Program Manager (AppSec)
Application Security Engineer
Principle Engineer-AppSec
Program Manager (Corp Security)
Sr. Specialist, Security Technology
Program Manager (Sec. Technology)
Security Technology Engineer

Information Security Organization Chart

3. Data

The system of information security controls were designed to protect specific client contact information, server location, and access credentials. ConnectWise products and services operate with a defined hierarchy of access control requirements.

- Partners can only see their own information.
- Clients can only see their own information.

Data is handled in accordance with the Information Classification & Handling Policy which is included in the Information Security Policy. As per the Information Classification & Handling Policy, the following classifications are maintained: Restricted, Confidential Information, Internal, and Public Information. Each type of information has its own exposure level.

The nature and purpose of processing customer's personal data is to:

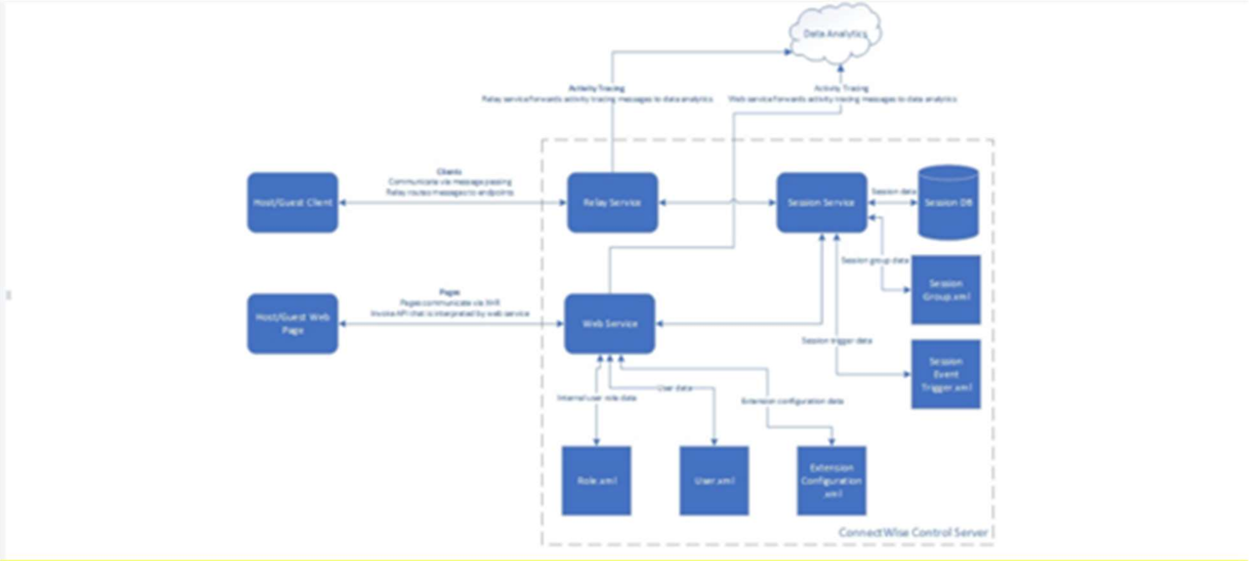
1. Provide the service.
2. Provide technical administration and customer support.
3. Respond to inquiries.
4. Send important notices, such as communications about purchases and changes to terms, conditions, and policies.
5. Payments for purchases made.
6. Deliver Process products and services purchased or requested.
7. Manage use of the service.

8. Enforce ConnectWise's Terms of Service

Formal data retention and destruction standards have been developed to provide guidelines for the retention of data for required periods of time.

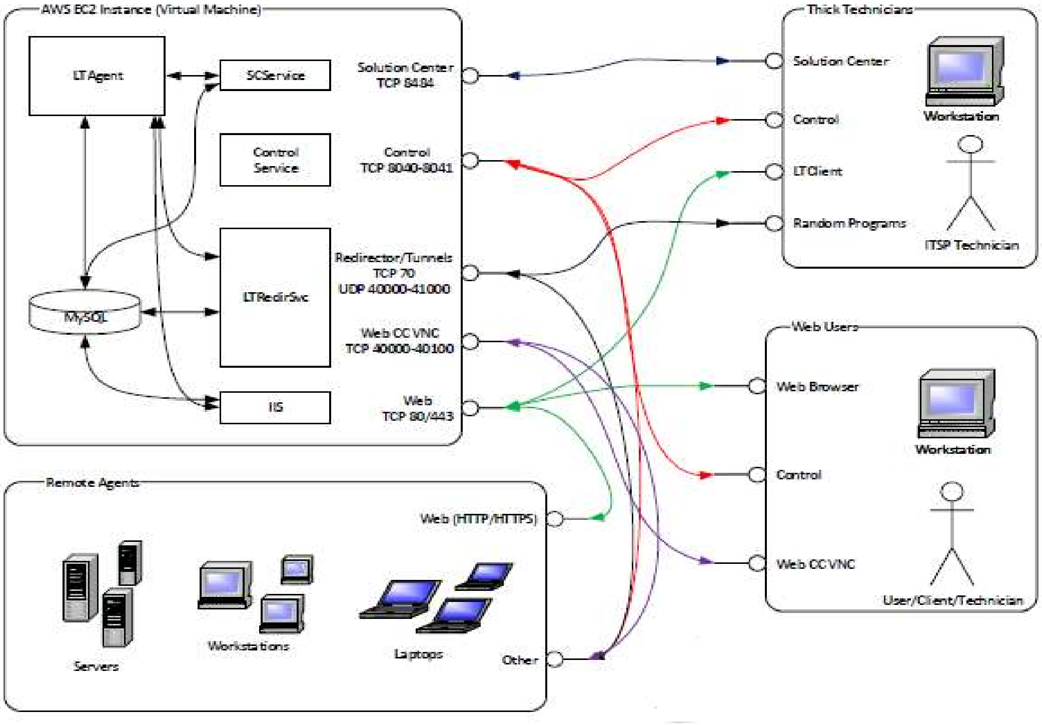
The Company disposes of partner data upon request from the partner to delete the data. An Information Classification and Handling Policy is maintained by management that requires internal controls be implemented to prevent loss, modification, or misuse of confidential information.

Data collected by the Control application is maintained in a SQLite database instance dedicated to each partner. Partner data is limited based on the service provided by Control. Control stores chat sessions and session recordings. A data stream from Control is anonymized and used to identify security events and technical issues. The data stream is also used to gather metrics on product usage. This provides development personnel data to make improvements based on how the product is used.


Data Analytics
Activity Tracing
Relay service forwards activity tracing messages to data analytics
Activity Tracing
Web service forwards activity tracing messages to data analytics
Clients
Communicate via message passing
Relay routes messages to endpoints
Host/Guest Client
Relay Service
Session Service
Session data
Session DB
Session group data
Session Group.xml
Pages
Pages communicate via XHR
Invoke API that is interpreted by web service
Host/Guest Web Page
Web Service
Session trigger data
Session Event Trigger.xml
Internal user role data
User data
Extension configuration data
Role.xml
User.xml
Extension Configuration .xml
ConnectWise Control Server

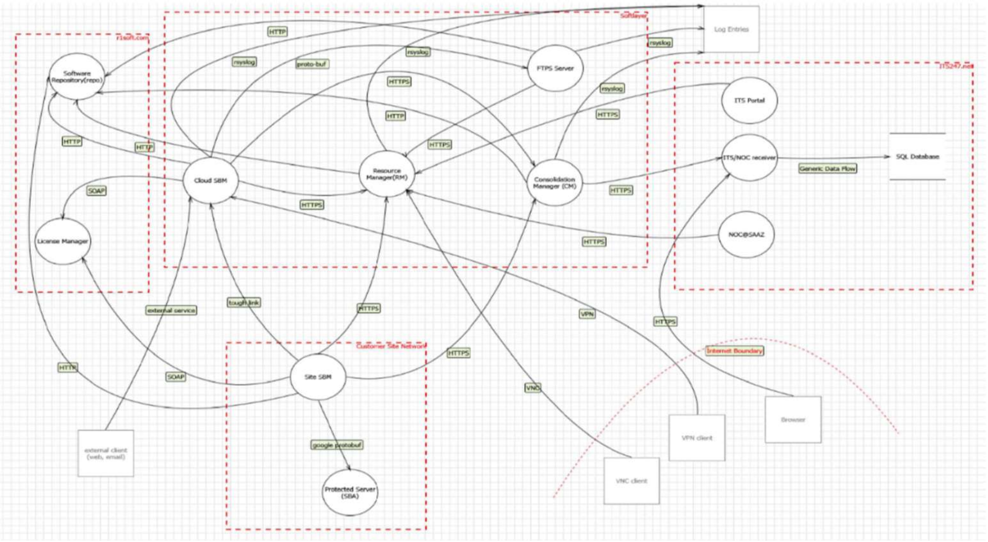
Control Data Flow Diagram

Data collected by the Automate application is maintained in a MySQL database located in an instance dedicated to each partner. Partner data is limited based on the service provided by Automate. Automate stores log data and session data. A data stream from Automate is anonymized and used to identify security events and technical issues. The data stream is also used to gather metrics on product usage. This provides development personnel data to make improvements based on how the product is used.



Automate Information Flow Diagram

Recover data in IBM Cloud IaaS is stored in primary Oracle databases that enforce encryption utilizing advanced encryption standards (AES) and key management systems separating encryption keys from the data they encrypt.



Process Flow of Recover System

4. Policies and Procedures

Policies

ConnectWise management has developed and communicated policies and procedures to all corporate employees and contractors in order to secure systems and facilities and reduce the risk of data loss, compromise, or breach. Changes to these policies and procedures are performed annually and are authorized by senior management. The following policies are in place:

- Acceptable Usage - The purpose of this policy is to set expectations to adhere to the proper use and protection of all information systems.
- Clear Desk - The purpose for this policy is to establish the minimum requirements for maintaining a “clean desk” to prevent any intentional or unintentional information leakage.
- Acceptable Encryption - The purpose of this policy is to implement strong encryption controls to protect the Company’s Information during transit and rest to help ensure confidentiality and integrity.
- Acquisition - The purpose of this policy is to establish InfoSec responsibilities in case of corporate acquisition and define the minimum-security requirements of an InfoSec acquisition assessment.
- Anti-Virus - The purpose of this policy is to safeguard all devices owned by the Company from any malicious code.
- Data Backup - The purpose of this policy is to help ensure the availability of data and business continuity in case of an accidental deletion or corruption of data.
- Data Retention and Records - The purpose of this policy is to help ensure that all the information is retained and disposed as per business requirement & legal and regulatory requirements.
- Database Security - The purpose of this policy is to help ensure confidentiality and integrity of databases where credential information is stored.

- Media Disposal - The purpose of this policy is to establish a standard for the proper disposal of media containing electronic data and to prevent any unauthorized disclosure of the information.
- Information Security Risk Assessment - The purpose of this policy is to perform periodic information security risk assessments ("RAs") to help ensure risks are identified, mitigated, and communicated in a timely manner.
- Information Classification and Handling - The purpose of this policy is to define the classification of the Company's information and provide guidelines for the management of this information to help ensure it is protected from the unauthorized and unintentional access, use and disclosure in accordance with its level of sensitivity.
- Password - The purpose of this policy is to establish a standard for creation of strong passwords, the protection of those passwords, and the frequency of change.
- Patch Management - This policy explains patch management procedure including acquiring, testing, and installing multiple patches of software or existing application.
- Physical Security for Information Resources - This policy is to control the physical access to ConnectWise's Information Resources. This policy sets forth the rules for establishing, controlling, and monitoring the physical access to Information Resources.
- Remote Access - The purpose of this policy is to help ensure adequate security measures while accessing the information from remote locations or from mobile device.
- Network Security - The purpose of this policy is to help ensure that access to ConnectWise networks is managed and controlled to protect information and Information System.
- Secure Application Development - The purpose of this policy is to help ensure ConnectWise's business applications are written with secure coding standard to protect confidentiality and integrity of Information.
- Server Security - The purpose of this policy is to establish standards for the base configuration of the internal servers that are owned and/or operated by ConnectWise.
- Change Management - The purpose of this policy is the basis of Senior Management support for the implementation of change processes to manage ConnectWise's information assets, including the network infrastructure and applications by assuring that changes to the IT environment are made in a controlled manner.
- Access Control - The purpose of this policy is to help ensure confidentiality and integrity of information and to timely grant and revoke of information access as per business requirements.
- Incident Response - The purpose of this policy is to define steps to recover quickly from any kind of security incidents to help ensure minimal business impact and help ensure business continuity.
- Information Security Continuity - The purpose of this policy is to help ensure continuity and security of operation in case of disaster.
- Vendor Security Risk Management - The purpose of this policy is to help ensure vendor has adequate risk management program in place to protect ConnectWise's customer's information.
- Information Security Compliance - The purpose of this policy is to maintain a documented Information security Compliance policy. This document shall guide about compliance requirements and steps to get compliant with relevant laws, regulations.
- Asset Management - The purpose of this policy is to maintain a documented asset management guideline and to achieve, maintain appropriate protection of all ConnectWise assets.
- Vulnerability Management - The purpose of this policy is to maintain a documented Vulnerability Management program, which will guide authorized ConnectWise personnel to perform information security vulnerability assessment in order to determine vulnerable areas. The critical and high vulnerabilities identified have an SLA in place for timely remediation the vulnerabilities. The InfoSec team performs penetration testing bi-annually to identify vulnerabilities present in the organization.

- Audit Log & Monitoring - Audit log policy outlines the relevant auditing and logging procedures for computer systems, networks, and devices stores or transport critical data.
- Privilege Identity Access Management - The purpose of this policy is to help ensure protection of privilege accounts to prevent from any misuse and unauthorized access.
- Security Awareness - The purpose of this policy is to create Information Security Awareness for all Company's employees as awareness is major part of Information Security. This policy defines the steps to spread provide security awareness in the organization.
- Email Security - The purpose of this policy is to minimize any risk that may arise from the use of email, compromised email account, and reduce threat related to unauthorized access of email.
- Minimum System level Security - The purpose of this policy is to maintain minimum security measures on all the information systems owned by ConnectWise before they are deployed onto the Company network.
- Cloud Security - The purpose of this policy is to maintain confidentiality, Integrity, and availability of the information when stored, transmitted or processed by a third-party cloud provider.
- Talent Management - The purpose of this policy is to help ensure that the employees and contractors understand their responsibility and are suitable for the roles for which they are considered.
- New Technology adoption - The purpose of this policy is to maintain guidelines while adopting new technology so to make adoption process smooth and less vulnerable for sophisticated attacks.

Procedures

Standard operating procedures (SOPs) are documented for automated and manual procedures involved in the operation of the SaaS platform. Along with SOPs, management has identified and put into effect actions needed to affect those standards. Control activities have been placed into operation to help ensure that the actions are carried out properly and efficiently.

Documented information security policies and procedures are in place to guide IT and operations personnel in information security administration processes, including, but not limited to acceptable usage, access provisioning, password management, change management, incident response, network security, database security, Asset Management, Information Security Risk Assessment, Vendor Security Risk Management, and data retention and classification. The policies are made available via the intranet and personnel are required to acknowledge their acceptance. The Company has implemented a security awareness program to communicate the information security, availability, confidentiality, and privacy policies and procedures to employees and contractors. Employees and contractors are required to complete the security awareness program on an annual basis.

The Company has implemented a formal written Information Security Policy which addresses the security, availability, confidentiality, and privacy of the system and covers the escalation process for security breaches and other incidents, and the policies are posted on the Company's intranet.

D. Principal Service Commitments and System Requirements

ConnectWise takes security very seriously looking at security as a dynamic threat and continues to work to optimize security for its partners and community. ConnectWise regularly conducts penetration tests that are performed by both internal and external ethical hackers and runs vulnerability assessments on their systems and products on a consistent basis. ConnectWise products are subject to multiple layers of security from design through testing and into operations. Products designs are aligned with security leading-practices and undergo security testing prior to release and regularly in production. In addition, ConnectWise developers' complete security training on an annual basis at a minimum.

Security, availability, confidentiality, and privacy commitments to user entities are documented and communicated in Service Level Agreements (SLAs) and other customer agreements, as well as in the description of the service offering provided online. Security, availability, confidentiality, and privacy commitments are standardized and include, but are not limited to, the following:

- The use of security and confidentiality principles that are designed to permit system users to access the information they need based on their role in the system while restricting them from accessing information not needed for their role;4s
- The use of encryption technologies to protect customer data in transit over untrusted networks;
- The use of reasonable precautions to protect the security and confidentiality of the information that is collected;
- Making commercially reasonable efforts to automatically filter certain personal information collected from the System such as password and account numbers; and
- Making commercially reasonable efforts to destroy or encrypt any information that is not filtered automatically.

ConnectWise 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 ConnectWise'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 is protected.

E. Non-Applicable Trust Services Criteria

Security, Availability, Confidentiality, and Privacy Trust Services Categories		
Non-Applicable Trust Services Criteria		**ConnectWise's Rationale**
CC 6.4	The entity restricts physical access to facilities and protected information assets (for example, data center facilities, back-up media storage, and other sensitive locations) to authorized personnel to meet the entity's objectives.	This criterion is not applicable as ConnectWise leverages only third-party Platform as-a-Service (PaaS) provided by Amazon Web Services (AWS), Backup-as-a-Service (BaaS), Disaster Recovery-as-a-service (DRaaS) and Storage-as-a-Service (STaaS)s, provided by Markley Boston LLC and Markley Lowell, LLC (Markley), and Infrastructure-as-a-Service (IaaS) provided by SoftLayer, Inc. (IBM SoftLayer), for providing customer-related services; therefore, physical access is not applicable as the Company does not maintain any hard copy data or store any customer information in a physical location that the Company controls.
P 1.1	The entity provides notice to data subjects about its privacy practices to meet the entity's objectives related to privacy. The notice is updated and communicated to data subjects in a timely manner for changes to the entity's privacy practices, including changes in the use of personal information, to meet the entity's objectives related to privacy.	This criterion is not applicable to ConnectWise because the Company does not directly interact with the Client's and Partner's data subjects who are utilizing the solution. Clients and Partners are the data owner and data controller of all information stored within the solution.

Security, Availability, Confidentiality, and Privacy Trust Services Categories		
Non-Applicable Trust Services Criteria		**ConnectWise's Rationale**
P 2.1	The entity communicates choices available regarding the collection, use, retention, disclosure, and disposal of personal information to the data subjects and the consequences, if any, of each choice. Explicit consent for the collection, use, retention, disclosure, and disposal of personal information is obtained from data subjects or other authorized persons, if required. Such consent is obtained only for the intended purpose of the information to meet the entity's objectives related to privacy. The entity's basis for determining implicit consent for the collection, use, retention, disclosure, and disposal of personal information is documented.	This criterion is not applicable to ConnectWise because the Company does not directly interact with the Client's and Partner's data subjects who are utilizing the solution. Clients and Partners are the data owner and data controller of all information stored within the solution.
P 3.1	Personal information is collected consistent with the entity's objectives related to privacy.	This criterion is not applicable to ConnectWise because the Company does not directly interact with the Clients and Partner's data subjects who are utilizing the solution. Clients and Partners are the data owner and data controller of all information stored within the solution.
P 3.2	For information requiring explicit consent, the entity communicates the need for such consent, as well as the consequences of a failure to provide consent for the request for personal information and obtains the consent prior to the collection of the information to meet the entity's objectives related to privacy.	This criterion is not applicable to ConnectWise because the Company does not directly interact with the Client's and Partner's data subjects who are utilizing the solution. Clients and Partners are the data owner and data controller of all information stored within the solution.
P 5.1	The entity grants identified, and authenticated data subjects the ability to access their stored personal information for review and, upon request, provides physical or electronic copies of that information to data subjects	This criterion is not applicable to ConnectWise because the Company does not directly interact with the Client's and Partner's data subjects who are utilizing the solution. Clients and Partners are the data owner and data controller of all information stored within the solution.

Security, Availability, Confidentiality, and Privacy Trust Services Categories		
Non-Applicable Trust Services Criteria		**ConnectWise's Rationale**
	to meet the entity's objectives related to privacy. If access is denied, data subjects are informed of the denial and reason for such denial, as required, to meet the entity's objectives related to privacy.	
P 5.2	The entity corrects, amends, or appends personal information based on information provided by data subjects and communicates such information to third parties, as committed or required, to meet the entity's objectives related to privacy. If a request for correction is denied, data subjects are informed of the denial and reason for such denial to meet the entity's objectives related to privacy.	This criterion is not applicable to ConnectWise because the Company does not directly interact with the Client's and Partner's data subjects who are utilizing the solution. Clients and Partners are the data owner and data controller of all information stored within the solution.
P 6.2	The entity creates and retains a complete, accurate, and timely record of authorized disclosures of personal information to meet the entity's objectives related to privacy.	This criterion is not applicable to ConnectWise because the Company does not directly interact with the Client's and Partner's data subjects who are utilizing the solution. Clients and Partners are the data owner and data controller of all information stored within the solution. ConnectWise does not perform any authorized disclosures of Partner information.
P 6.6	The entity provides notification of breaches and incidents to affected data subjects, regulators, and others to meet the entity's objectives related to privacy.	This criterion is not applicable to ConnectWise because the Company does not directly interact with the Client's and Partner's data subjects who are utilizing the solution. Clients and Partners are the data owner and data controller of all information stored within the solution.
P 6.7	The entity provides data subjects with an accounting of the personal information held and disclosure of the data subjects' personal information, upon the data subjects' request, to meet the entity's objectives related to privacy.	This criterion is not applicable to ConnectWise because the Company does not directly interact with the Client's and Partner's data subjects who are utilizing the solution. Clients and Partners are the data owner and data controller of all information stored within the solution.

Security, Availability, Confidentiality, and Privacy Trust Services Categories		
Non-Applicable Trust Services Criteria		**ConnectWise's Rationale**
P 7.1	The entity collects and maintains accurate, up-to-date, complete, and relevant personal information to meet the entity's objectives related to privacy.	This criterion is not applicable to ConnectWise because the Company does not directly interact with the Client's and Partner's data subjects who are utilizing the solution. Clients and Partners are the data owner and data controller of all information stored within the solution.

F. Subservice Organizations

The Company utilizes subservice organizations to perform certain functions. The description includes only the policies, procedures, and control activities at the Company and does not include the policies, procedures, and control activities at the third-party subservice organizations described below. The examination by the Independent Service Auditor did not extend to the policies and procedures at these subservice organizations.

Complementary subservice organization controls, controls that management of the service organization assumes will be implemented by the subservice organizations and are necessary to achieve the service organization's service commitments and system requirements based on the applicable trust services criteria, along with the associated subservice organizations, are included within the table below. Management also describes the activities performed to monitor the effectiveness of controls at the subservice organizations. Each user entity's internal control must be evaluated in conjunction with the Company's controls and taking into account the related complementary subservice organization controls expected to be implemented at the subservice organizations as described below.

Subservice Organization	Services Provided/Complementary Controls/Monitoring Controls	Associated Criteria
Amazon Web Services (AWS)	The Company uses Amazon AWS Elastic Compute Cloud (Amazon EC2) for its third-party hosting of servers and equipment in an Infrastructure-as-a-Service environment, including the restriction of physical access to the defined system including, but not limited to, facilities, backup media, and other system components such as firewalls, routers, and servers. The Company also uses the Amazon Simple Storage Service (S3) as a Platform-as-a-Service. Amazon S3 provides object storage through a web service interface. The following control activities are critical to achieving the Applicable Trust Services Criteria: • Controls around the underlying infrastructure and Data Centers supporting the in-scope production environments including environmental safeguards such as UPS, backup generators, and fire suppression; • Controls over managing infrastructure such as physical servers and physical access to backups and facilities; • Controls over the change management processes for the physical servers supporting the Infrastructure-as-a-Service Platform; • Controls over the configuration settings within the EC2 to ensure that data is encrypted and stored as per the configuration settings selected with AWS; • Controls over incident monitoring, response, and follow up; • Controls over managing the Platform-as-a-Service components for S3 such as physical servers and operating systems including applying critical patching for this infrastructure; • Controls over managing AWS Platform-as-a-Service components for S3 including operating system installation and patches; database software installation and patches; and routers/firewalls monitoring and maintenances; • Controls around AWS S3 redundancy, including controls over data replication; and • Controls around the change management processes for the AWS Infrastructure-as-a-Service Platform and Platform-as-a-Service Platform (S3) components as applicable. In addition, the Company has identified the following control activity to help monitor the subservice organization: • Vendor risk assessments are performed for all critical vendors annually. As a part of this assessment, the InfoSec team verifies critical vendor's compliance with frameworks such as GDPR, SOC 2 Type II, and ISO 27001 to assess their security benchmark in terms of security commitment.	CC 5.2* CC 6.1* CC 6.2* CC 6.3* CC 6.4 CC 6.5* CC 6.6* CC 6.7* CC 6.8* CC 7.1* CC 7.2* CC 7.2* CC 7.4* CC 7.5* CC 8.1* CC 9.1* CC 9.2* A 1.1* A 1.2* A 1.3* C 1.1* C 1.2* P 4.3* P 6.6*

Subservice Organization	Services Provided/Complementary Controls/Monitoring Controls	Associated Criteria
Markley	The Company uses Markley for third-party Backup-as-a-Service (BaaS), Disaster Recovery-as-a-service (DRaaS) and Storage-as-a-Service (STaaS), including restriction of physical access to the defined system including, but not limited to, facilities, backup media, and other system components such as firewalls, routers, and servers. The following control activities are critical to achieving the Applicable Trust Services Criteria: • Controls around the underlying infrastructure and Data Centers supporting the Recover production environment including environmental safeguards such as UPS, backup generators, and fire suppression; • Controls over managing infrastructure such as physical servers and physical access to backups and facilities; • Controls around storage redundancy, including controls over data replication, physical access to storage systems, system installation and patching, and system configuration; • Controls over Backup-as-a-Service (BaaS), Disaster Recovery-as-a-service (DRaaS) and Storage-as-a-Service (STaaS) components including incidents related to security and availability including responding to items identified; • Controls over the database including database backups, operating system installation and patches, encryption, database software installation and patches, and routers/firewalls monitoring and maintenances; • Controls around the change management processes for the Markley Colocation and Data Centre Hosting components as applicable. In addition, the Company has identified the following control activity to help monitor the subservice organization: • Vendor risk assessments are performed for all critical vendors annually. As a part of this assessment, the InfoSec team verifies critical vendor's compliance with frameworks such as GDPR, SOC 2 Type II, and ISO 27001 to assess their security benchmark in terms of security commitment.	CC 5.2* CC 6.1* CC 6.2* CC 6.3* CC 6.4 CC 6.6* CC 6.7* CC 6.8* CC 7.1* CC 7.2* CC 7.3* CC 7.4* CC 7.5* CC 8.1* CC 9.1* A 1.1* A 1.2* A 1.3* C 1.1*

Subservice Organization	Services Provided/Complementary Controls/Monitoring Controls	Associated Criteria
OVHcloud	The Company uses OVHcloud for its third-party colocation data center services for the hosting of servers and equipment, including the restriction of physical access to the defined system including, but not limited to, facilities, backup media, and other system components such as firewalls, routers, and servers. The data center hosts Worker Servers running Free License Control instances. The following control activities are critical to achieving the Applicable Trust Services Criteria: • Controls around the underlying infrastructure and Data Centers supporting the in-scope production environment including environmental safeguards such as UPS, backup generators, and fire suppression; and • Controls over physical access to the Data Centers hosting the in-scope production environment. In addition, the Company has identified the following control activity to help monitor the subservice organization: • Vendor risk assessments are performed for all critical vendors annually. As a part of this assessment, the InfoSec team verifies critical vendor's compliance with frameworks such as GDPR, SOC 2 Type II, and ISO 27001 to assess their security benchmark in terms of security commitment.	CC 6.4 A 1.2* A 1.3*
Equinix	The Company uses Equinix for its third-party colocation data center services for the hosting of servers and equipment, including the restriction of physical access to the defined system including, but not limited to, facilities, backup media, and other system components such as firewalls, routers, and servers. The data center hosts Worker Servers running Free License Control instances. The following control activities are critical to achieving the Applicable Trust Services Criteria: • Controls around the underlying infrastructure and Data Centers supporting the in-scope production environment including environmental safeguards such as UPS, backup generators, and fire suppression; and • Controls over physical access to the Data Centers hosting the in-scope production environment. In addition, the Company has identified the following control activity to help monitor the subservice organization: • Vendor risk assessments are performed for all critical vendors annually. As a part of this assessment, the InfoSec team verifies critical vendor's compliance with frameworks such as GDPR, SOC 2 Type II, and ISO 27001 to assess their security benchmark in terms of security commitment.	CC 6.4 A 1.2* A 1.3*

Subservice Organization	Services Provided/Complementary Controls/Monitoring Controls	Associated Criteria
IBM SoftLayer	The Company uses IBM SoftLayer for IaaS, including restriction of physical access to the defined system including, but not limited to, facilities, backup media, and other system components such as firewalls, routers, and servers. The following control activities are critical to achieving the Applicable Trust Services Criteria: • Controls around the underlying infrastructure and data centers supporting the Recover production environment including environmental safeguards such as UPS, backup generators, and fire suppression; • Controls over managing infrastructure such as physical servers and physical access to backups and facilities; • Controls around storage redundancy, including controls over data replication, physical access to storage systems, system installation and patching, and system configuration; • Controls over Infrastructure-as-a-Service (IaaS) components including incidents related to security and availability including responding to items identified; • Controls over the database including database backups, operating system installation and patches, encryption, database software installation and patches, and routers/firewalls monitoring and maintenances; • Controls around the change management processes for the IBM SoftLayer IaaS Infrastructure-as-a-Service components as applicable. In addition, the Company has identified the following control activity to help monitor the subservice organization: • Vendor risk assessments are performed for all critical vendors annually. As a part of this assessment, the InfoSec team verifies critical vendor's compliance with frameworks such as GDPR, SOC 2 Type II, and ISO 27001 to assess their security benchmark in terms of security commitment.	CC 5.2* CC 6.1* CC 6.2* CC 6.3* CC 6.4 CC 6.6* CC 6.7* CC 6.8* CC 7.1* CC 7.2* CC 7.3* CC 7.4* CC 7.5* CC 8.1* CC 9.1* A 1.1* A 1.2* A 1.3* C 1.1*

Subservice Organization	Services Provided/Complementary Controls/Monitoring Controls	Associated Criteria
Microsoft Azure	The Company uses Microsoft Azure's Platform-as-a-Service for its third-party hosting of servers and equipment, including the restriction of physical access to the defined system including, but not limited to, facilities, backup media, and other system components such as firewalls, routers, and servers. The Company also uses the Azure SQL Database and/or SQL Managed Instance service, which is a Platform-as-a-Service or more specifically a Database-as-a-Service. The Company uses Microsoft Azure for creating Azure Workflow logic, SQL databases for storing account information, and VM clusters for upgrading instances in Azure. The following control activities are critical to achieving the Applicable Trust Services Criteria: • Controls over the underlying infrastructure and Data Centers supporting the in-scope production environment including environmental safeguards such as UPS, backup generators, and fire suppression; • Controls over managing infrastructure and software including Azure SQL Database and/or SQL Managed Instance service such as physical servers and physical access to backups and facilities; • Controls over the change management processes for the software and infrastructure supporting the platform including Azure SQL Database and/or SQL Managed Instance service; • Controls over incident monitoring, response, and follow up; • Controls over the prevention, detection, and follow up upon the introduction of malicious software; • Controls around Azure Storage redundancy, including controls over data replication; • Controls over the encryption of transmitted and stored data within the platform including Azure SQL Database and/or SQL Managed Instance service; and • Controls over managing patching for the software and infrastructure supporting the platform, including Azure SQL Database and/or SQL Managed Instance service. In addition, the Company has identified the following control activity to help monitor the subservice organization: • Vendor risk assessments are performed for all critical vendors annually. As a part of this assessment, the InfoSec team verifies critical vendor's compliance with frameworks such as GDPR, SOC 2 Type II, and ISO 27001 to assess their security benchmark in terms of security commitment.	CC 5.2* CC 6.1* CC 6.2* CC 6.3* CC 6.4 CC 6.5* CC 6.6* CC 6.7* CC 6.8* CC 7.1* CC 7.2* CC 7.3* CC 7.4* CC 7.5* CC 8.1* CC 9.1* CC 9.2* A 1.1* A 1.2* A 1.3* C 1.1* C 1.2* P 4.3* P 6.6*

** The achievement of design and operating effectiveness related to this criterion assumes that the complementary controls at this subservice organization that support the service organization's service commitments and system requirements are in place and are operating effectively.*

G. User Entity Controls

ConnectWise's controls relating to the system cover only a portion of the overall internal control structure of each user entity of the Company. It is not feasible for the Company's service commitments and system requirements to be achieved based on the applicable trust services criteria solely by the Company. Therefore, each user entity's internal control must be evaluated in conjunction with the Company's controls and taking into account the related complementary user entity controls identified within the table below, where applicable. As applicable, suggested control considerations and/or complementary user entity controls and their associated criteria have been included within the table below.

Management has highlighted criterion in which complementary user entity controls were assumed in the design of the Company's system with an asterisk. In order for user entities to rely on the controls reported on herein, each user entity must evaluate its own internal control environment to determine if the identified complementary user entity controls have been implemented and are operating effectively.

Furthermore, the table below includes suggested control considerations that the Company believes each user organization should consider in developing their internal controls or planning their audits that are relevant to the Company's controls detailed in this report, however, such control considerations are not required to achieve design or operating effectiveness for the Company's service commitments and system requirements based on the applicable trust services criteria. The following list of suggested control activities is intended to address only those policies and procedures surrounding the interface and communication between the Company and each user entity. Accordingly, this list does not allege to be, and is not, a complete listing of all the control activities which provide a basis for the assertions underlying the control environments for the Company's user entities.

User Entity Control	Associated Criteria
User entities are responsible for informing ConnectWise of any regulatory issues that may affect the services provided by ConnectWise to the user entity.	CC 2.3
User entities are responsible for understanding and complying with their contractual obligations to ConnectWise.	CC 2.3
User entities are responsible for notifying ConnectWise personnel, in a timely manner, when changes are made to technical, billing, or administrative contact information.	CC 6.1
User entities are responsible for developing their own disaster recovery and business continuity plans that address their inability to access or utilize ConnectWise's services.	CC 7.5* A 1.3*
User entities are responsible for ensuring that user IDs and passwords are assigned only to authorized individuals and that the roles assigned to the user accounts are appropriate through the use of administrative accounts provided by ConnectWise.	CC 6.1* CC 6.2* CC 6.3*
User entities are responsible for ensuring the confidentiality of any user IDs and passwords assigned to them for use with ConnectWise's systems.	CC 6.1* CC 6.2* CC 6.3* C 1.1*
User entities are responsible for the administration of user access for the ConnectWise applications.	CC 6.1* CC 6.2* CC 6.3*

User Entity Control	Associated Criteria
User entities are responsible for configuring password parameters for the Control, Automate, and Recover Systems.	CC 6.1
User entities are responsible for immediately notifying ConnectWise personnel of any actual or suspected information security breaches, including compromised user accounts.	CC 7.2 CC 7.3 CC 7.4 CC 7.5
User entities are responsible for ensuring that appropriate individuals have the requisite training on ConnectWise software.	CC 2.3
User entities are responsible for responding to alert notifications.	CC 7.1
User entities are responsible for determining whether ConnectWise's security infrastructure is appropriate for its needs and for notifying ConnectWise personnel of any requested modifications.	CC 8.1
User entities are responsible for implementing a security infrastructure and practices to prevent unauthorized access to their internal network and to limit threats from connections to external networks.	CC 6.1 CC 6.2 CC 6.3 CC 6.6
User entities are responsible for applying changes to the production environment or for granting access to ConnectWise employees to apply changes to production.	CC 7.1 CC 8.1
User entities are responsible for ensuring that the software is configured and functioning per their requirements and notifying ConnectWise personnel in a timely manner of any issues.	CC 7.1 CC 7.2

** The achievement of design and operating effectiveness related to this criterion assumes that the complementary user entity controls that support the service organization's service commitments and system requirements are in place and are operating effectively.*

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