

Nulab Security Whitepaper

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Nulab Inc.

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1. Policy and Structure

Policy of Nulab Inc. ("us", "we" or "Nulab")

We have established a <u>Basic Policy on Information Security</u>. We will comply with this basic policy and practice activities to maintain information security such as the confidentiality, integrity, and availability of information assets.

Security System

We maintain appropriate technical and organization measures, internal controls and information security system, in order to protect User Data from loss, damage or alteration due to force majeure, unauthorized access or leakage, or destruction through illegal acts. We implement appropriate measures from various perspectives, including organizational, human, technical, and physical, and maintain and manage them.

2. Separation of Responsibilities

Responsibilities of Nulab.

We will implement the following security measures.

- Security measures for the services provided by us (Backlog, Cacoo, Typetalk, Nulab Apps(*1), Nulab Pass)
- Protection of user data stored in the above services
- Middleware, OS and other infrastructural security that is required for the provision of the above services
- Appropriate management of accounts involved in the operation of the above services (registration, deletion, granting of administrative privileges, etc.)

*1

Nulab Apps is the shared account ("Nulab Account") etc. functionality provided by Nulab.

Handling of User Data

Our employees will never process user data without the approval of the user. Our employees are under confidentiality obligations that survive any termination of their employment.

Except for the limited cases described in the Terms of Service or related agreements or Privacy Policy, we will not transfer to a third-party user data collected through the use of the Service.



We use user data for the following purposes:

- 1. User data will be used only for the purpose of providing the services to users, including troubleshooting to prevent, detect or solve issues affecting the operation of the service, as well as improving user data protection functions by detecting threats occurring and spreading (malware or spam).
- 2. We will not disclose user data to law enforcement agencies unless otherwise required by law. In the event that we are required by a law enforcement agency to disclose user data, we will request that such a law enforcement agency directly make such a request to users. As part of this process, we may provide Users' basic contact information to the law enforcement agency. If the disclosure of user data is compelled by a law enforcement agency, we shall make commercially reasonable efforts to notify the respective users prior to making such disclosure.

Responsibilities of the user

The user shall be responsible for implementing the following security measures.

- Proper Account (*2) management (Grant of authorities for registration, deletion, administration etc)
- Proper management of password (Including the management of devices used for two factor authentication)
- Proper management of registered contents
- Registration of accurate contact information, such as an e-mail address, from which we can notify you

*2

Hereinafter, an account might be referred to as a user, however that should be all a reference to the account



3. Location of Data Storage and Processing

Location of data storage and data processing

Data received from our customers will be processed and stored at the cloud vendor's data center shown below as necessary to provide services.

Name of Service	Location of Data Storage
Nulab Apps	AWS (USA (Oregon))
Backlog	In case of application from the <u>Japanese website</u> AWS (Japan (Tokyo))
	In case of application from the English website AWS (USA (Oregon))
Cacoo	AWS (USA (California))
Typetalk	AWS (USA (Oregon))
Nulab Pass	AWS (USA (Oregon)) * Data other than audit log
	AWS (Japan (Tokyo)) * Only audit log data

Location of data processing

Data received from customers through certain functions will be processed at the cloud vendor's data center as indicated below as necessary to provide the service. Data will not be stored.

Name of Service	Function Name	Location of Data Processing
Backlog	AI Assistant	In case of using from the Japanese website AWS (Tokyo, Japan) AWS (Osaka, Japan) AWS (Seoul, Korea) AWS (Hyderabad, India) AWS (Mumbai, India) AWS (Singapore) AWS (Sydney, Australia) AWS (Melbourne, Australia) In case of using from the English website



	AWS (Oregon, USA)
	AWS (Oregon, USA) AWS (Virginia, USA) AWS (Ohio, USA)

4. Deletion

If the Administrator follows the steps set forth by Nulab to terminate the use of the services ("Service Termination Request"*1), we will delete the data received by the users ("User Data"). Also, if a trial period ends without a submission of a request for a Paid plan, or if the Services are terminated for reasons such as delayed payments, the User Data will be deleted. In this case, upon completion of the deletion, the User Data cannot be retrieved even by Nulab. Conditions for deletion, timing of deletion and the User Data subject to deletion are set forth in the table below.

• "Delete organization" in Nulab Account

Conditions and timing of deletion

	Conditions for deletion of User Data	Timing of deletion (General rule)
Backlog Classic Plan	Termination request has been submitted	The deletion of User Data process will start after 180 days have elapsed following (i) the termination of the current agreement for Spaces under paid plans; or (ii) the submission of a termination request for Spaces during paid plan trial periods or under free plans, and will be complete within 10 days of start*.
	The trial period is ended without a request for formal paid plans	The deletion of the Organization will be automatically implemented after 30 days from the end date of the trial period. The deletion of User Data process will start after 180 days following the implementation of deletion of the Organization and will be complete within 10 days of start*.
	The Services are terminated due	The deletion of the



^{*1}

[&]quot;Service Termination Request" means the below action.

	to payment delay or any other reasons pursuant to the Article 9.1 of Nulab Terms of Service	Organizations will be automatically implemented after 90 days of the termination of the Services. The deletion of User Data process will start after 180 days following the implementation of termination and will be completed within 10 days of start*.
Cacoo Plus Plan, and Free Plan subscribed prior to November 27, 2019.	Deletion of Nulab Account	The deletion of User Data process will start upon deletion of the Nulab account and will be completed within 10 days of start*.
Backlog, Cacoo and Typetalk plans other than above	Deletion of Organization	The deletion of User Data process will start after 180 days following the implementation of deletion of the Organization and will be completed within 10 days of start*.
	The trial period is ended without a request for formal paid plans	The deletion of the Organization will be automatically implemented after 30 days from the end date of the trial period. The deletion of User Data process will start after 180 days following the implementation of deletion of the Organization and will be complete within 10 days of start*.
	The Services are terminated due to payment delay or any other reasons pursuant to the Article 9.1 of Nulab Terms of Service	The termination of the Organization will be automatically implemented after 90 days have passed from the suspension of the Services. The deletion of User Data process will start after 180 days following the implementation of deletion of the Organization and will be complete within 10 days of start*.
Nulab Account	Deletion of Nulab Account	The deletion of User Data process will start upon deletion of the Nulab account and will be complete within 10 days of start*.



Managed Account	Deletion of Organization or Managed Account	In case the deletion of the Organization is implemented; the deletion of User Data process will start after 180 days following the implementation of deletion of the Organization and will be complete within 10 days of start*. In case the deletion of the Managed Account is implemented; the deletion of User Data process starts upon the deletion and will be complete within 10 days of start*.
	The trial period is ended without a request for formal paid plans	The deletion of the Organization will be automatically implemented after 30 days from the end date of the trial period. The deletion of User Data process will start after 180 days following the implementation of deletion of the Organization and will be complete within 10 days of start*.
	The Services are terminated due to payment delay and any other reasons pursuant to the Article 9.1 of Nulab Terms of Service	The deletion of the Organization will be automatically implemented after 90 days from the termination of the Services. The deletion of User Data process will start after 180 days following the implementation of deletion of the Organization and will be complete within 10 days of start*.
Audit Log	Deletion of Organization	The deletion of the audit log process will start after 180 days following the implementation of deletion of the Organization and will be complete within 10 days from the start*.
	The contract period for Nulab Pass has expired	The deletion of the audit log process will start after 30 days following the expiration of the



	Nulab Pass contract and will be complete within 10 days from the start*.
The trial period for Nulab Pass has ended without a request for formal paid plans	The deletion of the audit log process will start after 30 days following the expiration of the Nulab Pass trial term and will be complete within 10 days from the start*.
The Services are terminated due to payment delay or any other reasons pursuant to the Article 9.1 of Nulab Terms of Service	The deletion of the audit log process will start after 30 days following the expiration of the Nulab Pass trial period and will be complete within 10 days from the start*.
13 months the audit log retention period has passed	The deletion process of the audit log will start after 400 days following the retention of the audit log, and will be completed within 10 days from the start*.

Notwithstanding the above, User Data will remain stored in the backup data collected for each service for a certain period even after the deletion completion dates listed above. For example, if the data's backups are made once a day and retained 30 times, the data will remain stored for 30 days in the data's backups after deletion is complete and will be deleted on the 31st day.

* All Typetalk data, including backups, will be deleted on December 31, 2025, after the service is terminated, notwithstanding the provisions of "Conditions and timing of deletion" above.

User Data Exempted from Deletion

All User Data registered by Users for each Service shall be deleted except for the following data:

- Data related to contracts, billing and deposit for each service
- Administrator's name and contact information for each service
- Backlog space owner's name and contact (Classic Plan)
- Backlog space ID
- Nulab Pass' Nulab Organization ID
- Image inserts uploaded to Cacoo
- Icon image set at the time of account deletion



However, in case of the deletion of the Nulab account, Managed Account or Backlog account (Classic Plan), the User Data in Backlog, Typetalk or Cacoo (excluding Free Plan and Plus Plan prior to November 27, 2019), created through the respective accounts, will not be deleted.

In order for these User Data to be deleted, it must fall into one of the items listed above other than "Nulab Account" or "Managed Account".

Log Protection and Deletion

Our service outputs and stores access logs and application logs on Amazon Web Services and Datadog. These logs are accessible only by specific business personnel.

The maximum log retention period is 545 days. We will start deleting logs after that retention period has elapsed, and will complete the deletion within 10 days from the start.

5. Labeling Mechanisms

Our services provide various settings and functions (labeling mechanisms) to classify information. This chapter mainly introduces functions to control account access.

For general information on functions related to the labeling mechanism, please refer to the procedure manual for each service (10. Providing Procedures).

For All Services

Teams (excluding Backlog Classic Plan)

Users can organize the Nulab accounts into teams.

• Team List and New Team Creation (Manual)

Backlog

Projects

Users can organize the accounts into projects, set up by the User.

- Add project (Manual)
- Add users (Manual)
- Project Settings (Manual)



Team Function (Backlog Classic Plan only)

Users can set up teams and group accounts into such teams.

• Team Settings (Manual)

Cacoo

Folders

Users can organize their canvases by folders.

• How to share canvases, stencils, templates in a folder (Manual)

Typetalk

Topics

Users can set up topics to discuss about a specific theme

- Create a topic (Manual)
- Edit a topic (Manual)
- Archive and delete a topic (Manual)

6. Adding and Deleting Users

For All Services (Excluding Backlog Classic)

User Registration

Customers can create a Nulab account through sign up (*1) or when they are invited to an organization. Accounts created through sign up will be administrators and they can perform the following organization management functions, such as "Invite to an organization" etc.

- Create a Nulab Account (Manual)
- Sign up for a Free trial of Backlog (Choose Plan)
- Sign up for a Free trial of Cacoo (Choose Plan)
- Sign up for a Free trial of Nulab Pass (<u>Trial Page</u>)



*1

Sign up refers to using the Services through a free trial, or to the creation of a Nulab Account from the Sig Up option.

Delete Users

Users can always opt to delete their Nulab Account.

Only the users themselves can delete their Nulab Account.

• Delete Nulab Account (Manual)

Invite to an Organization

Users with the authority to invite others can always invite other users to their organization.

• Invite Users (Manual)

Remove from an Organization

Administrators can remove users from their organizations. By removing a user, such removed user will be unable to use the services used by the organization.

Backlog (Classic Plan)

Backlog (Classic Plan), can be used with a Nulab Account or by creating a Backlog-only user. Authorized users, within the scope of their contract plan, can add or remove users.

• Add, Manage, Delete Users (Manual)

Nulab Pass

Through Nulab Pass, customers can create Managed accounts that are using an IdP (Identity Provider) and can be used with Single-Sign On (SSO).

The administrator can register or remove managed accounts.

Based on the selected plan, audit logs can be recorded and saved.

- Create, Manage, Delete Managed Accounts (Manual)
- Set SAML Authentication (SSO) (Manual)
- Changing an account type (Manual)
- Audit log settings and file (Manual)
- User Provisioning (Manual)



7. Access Rights Management

For All Services (Except Backlog Classic)

Users can set the access rights of a Nulab Account or a Team within an organization.

There are 3 types of authorities: administrator, general user and guest.

Also, general users can have the additional authorization to invite members.

- User Authorities (Manual)
- Invite Members to an Organization (Manual)
- Add Invitation Authority to General Users (Manual)

Backlog

Users can set access rights to projects and the information within the projects.

- User Authorities (Manual)
- Add, Manage and Delete Users (Manual)
- Edit Project Participants, Project Manager Settings (Manual)
- Add, Change and Delete Teams (Manual)

Backlog (Classic Plan)

Backlog (Classic Plan) has an account and team management function.

Add, Manage and Delete Users (<u>Manual</u>)

Cacoo

Users can set authorities for the folders within an organization.

There are 3 types of authorities, "Viewer", "Editor" and "Owner".

The administrator of an organization can authorize certain members of the organization to use Cacoo.

- Manage Access to Folders (<u>Manual</u>)
- Manage Active Users (<u>Manual</u>)

Typetalk

Depending on the organization authorities set by the user, different authorities can be set for the topics within Typetalk.



Administrators can authorize certain members of an organization to use Typetalk and to participate in topics.

- Member Authorities (Manual)
- Management of Topic Participants (Manual)
- Management of Organization Members (Manual)

Nulab Pass

Users can set up access rights to the recorded and saved audit logs.

- Audit log authorities (Manual)

8. How to Set Password

Nulab Account

Initial Password

Users can set their own password when they create their Nulab Account.

How to Change Password

• Password Management (Manual)

Backlog (Classic Plan)

For Backlog (Classic Plan), a password is automatically issued when the space administrator creates a new user.

Initial Password

When the administrator creates a new account, the initial password is generated and sent to the email address of the new account.

How to Change Password

• Change Password(Manual)



Nulab Pass

The login ID and the password to a Nulab Pass managed account is the login ID and the password set by the Customer on their IdP (Identity Provider).

Password information is not stored in Nulab Pass.

• Login with SAML Authentication (SSO) (Manual)

9. Encryption

User Information

- Each user information (such as name, email address) stored in databases are not encrypted but access rights are appropriately limited.
- Passwords are stored in an irreversible encrypted (hashed) state.

Correspondence with the Services

• Correspondence between Customer's terminal and the services provided by us are encrypted by SSL/TLS.

Database Encryption

Database file are encrypted for the following services.
 Target service: Cacoo, Typetalk

10. Manage Changes Management to the Services

Information about service changes that affect users and maintenance that involves service outages can be found at the link below. In addition, if there is a significant impact, we will also notify you on each service's dashboard and via newsletters.

- Product Updates (<u>Japanese</u>)
- Service Maintenance Information (<u>Japanese</u> / <u>English</u>)
- Backlog Announcements (<u>Japanese</u> / <u>English</u>)
- Backlog New Release (Japanese / English)
- Cacoo New Release (Japanese / English)
- Typetalk New Release (<u>Japanese</u> / <u>English</u>)
- Backlog Official X (Twitter) (<u>Japanese</u> / <u>English</u>)
- Cacoo Official X (Twitter) (Japanese / English)



• Typetalk Official X (Twitter) (<u>Japanese</u> / <u>English</u>)

11. Manuals

Various manuals for users can be accessed from the links below.

- Nulab AppsApp User Guide (<u>Japanese</u> / <u>English</u>)
- Backlog Tutorial (<u>Japanese</u> / <u>English</u>)
- Cacoo Support (<u>Japanese</u> / <u>English</u>)
- Typetalk Support (<u>Japanese</u> / <u>English</u>)
- Nulab Pass Support (<u>Japanese</u> / <u>English</u>)

12. Backup

For all Nulab Services

- Nulab is using the Snapshot function provided by AWS for the backup.
- Backup data is stored in high-availability and high-durability storage in AWS.
- The backup data is for the purpose of restoring the entire service, individual customer data cannot be restored individually.
- The region for the backup data is the same as the region specified in "2. Location of Data Storage".

Nulab Apps / Nulab Pass

- The scope, frequency and retention period of backups performed by Nulab are as follows.
 - o Database (users, group etc): Saved once a day and retain 14 savings

Backlog

- The scope, frequency and retention period of backups performed by Nulab are as follows.
 - o Database (issues, wiki etc.): Saved once a day and retain 30 savings.
 - Shared files, Git, Subversion: Saved twice a day and retain 60 savings.
- The above content is also described in our <u>Security, privacy and outage policies</u> as well.

Cacoo

• The scope, frequency and retention period of backups performed by Nulab are as follows.



- o Database (figures, templates saved by user etc): Saved once a day and retain 14 savings...
- Picture files used for figures: Since they are stored in highly available and highly durable storage, it is considered that there is almost no risk of loss, so they are excluded from backup.
- The above content is described in our <u>Security, privacy and outage policies</u>.

Typetalk

- The scope, frequency and retention period of backups performed by Nulab are as follows.
 - o Database (topics, messages, etc): Saved once a day and retain 14 savings.
 - Attached files: Since they are stored in highly available and highly durable storage, it is considered that there is almost no risk of loss, so they are excluded from backup.
- The above content is described in our <u>Security, privacy and outage policies</u> as well.
- Upon termination of service, backups will be deleted as of December 31, 2025.

13. Time zone information for logs

- Logs within the services provided by Nulab are taken in GMT(UTC+0) or JST(UTC+9), which is the server time.
- Log times are synchronized with the NTP service provided by AWS.

14. Information for Vulnerability Management

- The services we provide are periodically assessed for vulnerabilities by a third party once a year. We examine the contents of any identified issues and take necessary actions.
- The development team of our services regularly collects vulnerability information related to the OS, middleware, etc. used for the provision of the services.
- We publish <u>security.txt</u> to facilitate security researchers in reporting potential vulnerabilities to us.
- We operate a <u>Vulnerability Disclosure Program</u> as a dedicated channel for security researchers to report potential vulnerabilities to us.
- If a vulnerability patch for a component used in our services is released, we will promptly apply it according to a pre-established process.
- We do not provide specific information on all publicly available software vulnerabilities, including whether or not they are used by our company.
 - o Examples: OS, middleware, libraries, firmware
- If we confirm the impact of a vulnerability, we will notify the registered contact, including whether or not we will respond to the vulnerability.



15. Secure Development Life Cycle

- We check whether basic vulnerabilities have been addressed by means of mutual code reviews by development staff and static analysis of source code.
- We regularly check the libraries installed on servers or embedded in services for out-of-date versions, vulnerabilities discovered, etc. When a software lifecycle ends or a service is affected by a vulnerability, we take the appropriate action, such as updating the library group.

16. Human Security Initiatives

- We implement weekly security awareness tests as part of our efforts to elevate employee understanding of security best practices.
- We conduct multiple annual security training sessions, including group workshops and e-learning, tailored to employee roles.
- We have established incident response procedures and provide training to employees to ensure a rapid response during an incident.



17. Incident Response

- In the event a security incident (as defined by us) occurs, that affects users or that we believe may affect users, we will contact the user's administrator by e-mail or by one or more other means based on our choice within 72 hours.
- For inquiries relating to information security incidents reach us from the inquiry page below.
 - o Inquiry Page: https://nulab.com/contact/

18. Protection and Third Party Provision of User Data

- It is our responsibility to protect the data entrusted to us by the users.
- User data, including log data, is stored under access rights that are set so that only a limited number of people in each service development team can access it, in order to prevent unauthorized access and falsification.
- However, if we are legally obligated to provide user data, in a legally recognized form, such as by
 an order from a competent court to submit as evidence, Nulab will provide such user data without
 the user's permission, to the minimum extent necessary.

19. Governing Law

• The agreement between us and the users is governed by the laws of Japan.



20. Accreditation System

- We have acquired ISMS certification in the ISMS conformity assessment system operated by the Information Management System Accreditation Center (ISMS-AC). (*1)
- We have acquired ISMS cloud security certification in the ISMS conformity assessment system operated by the Information Management System Accreditation Center (ISMS-AC). (*2)

[Scope of ISMS Cloud Security Certification Registration]

Service Provider for the cloud services of Backlog, Cacoo, Typetalk, Nulab Apps for system development, operation and maintenance, and ISMS cloud security management system for use as a cloud service customer for Amazon Web Services.

21. Use of Third-Party Service Providers

The Services provided by Nulab use the following external cloud services for the provision of the listed functionalities. The content of this Security White Paper does not extend to the scope managed by the cloud services shown below, and we do not guarantee compliance with the content to that extent.

Cloud Service	Function	Provider
Amazon Web Service	Infrastructure Construction and Operation	Amazon Web Services, Inc.
Google Cloud	Infrastructure Construction and Operation	Google LLC
PagerDuty	Infrastructure Operation	PagerDuty, Inc.
mackerel	Infrastructure Operation	KK. Hatena
Datadog	Infrastructure Operation	Datadog, Inc.
Intercom	Customer Support	Intercom, Inc.
Google Workspace	Customer Support	Google LLC
Zendesk	Customer Support	Zendesk, Inc.



^{*1} https://isms.jp/lst/ind/CR IS x0020 656556.html

^{*2} https://isms.jp/isms-cls/lst/ind/CR CLOUD x0020 681700.html

KARAKURI **Customer Support** KARAKURI Inc. Stripe Payment Stripe, Inc. PayPal Holdings Inc. PayPal Payment Twilio **SMS** Transmission Twilio Inc. Mixpanel Data Analysis Mixpanel, Inc. Mailchimp **Email Transmission** Intuit Inc. SendGrid **Email Transmission** SendGrid, Inc. Marketo **Email Transmission** Adobe Inc. Customer Management, Salesforce Salesforce, Inc. Email Transmission Service Operation, Slack Technologies, LLC Slack Customer Support Snowflake Data Analysis Snowflake Inc.



Revision History

Version	Date of Revision	Content of Revision
1.0	25 Feb 2019	Original Version Issued
1.1	14 Jun 2019	11.Change of Backup Conditions for Backlog 19.Changes to services subject to exemption
1.2	9 Oct 2019	3. Change in data deletion
1.3	6 Dec 2019	19.Changes to services subject to deletion
1.4	19 Jul 2021	1. Separation of Responsibilities 2. Change of Data Storage Location 3. Change to data deletion 4. Labeling Function 5. User Registration and deletion 6. Access Rights Management 7. Password Distribution Method 10. Change of Manual 11. Change of Backup Conditions 15. Change to Incident Measures 19. Changes to services subject to exemption
1.5	24 Dec 2021	Changes relating to the addition of Nulab Pass's Audit log function 2. Change of Data Storage Location 3. Data Deletion 5. User Registration and deletion 6. Access Rights Management
1.6	26 Sep 2022	2. Modified the description of data storage location 3. Modified the description of target services for data deletion 11. Changed backup description in Cacoo part 19. Revised the heading and updated the target services
1.7	18 May 2023	5. User Registration and deletion - Change the manual 8. Encryption - Change the User Information 8. Encryption - Add the Database Encryption 11. Backup - Change the For all Nulab Services
1.8	1 Dec 2023	13. Information for Vulnerability Management - Change the vulnerability assessment
2.0	18 Sep 2024	Updated content following revised terms of service
2.1	3 Dec 2024	20. Updated the function of Salesforce
2.2	1 Mar 2025	Updated some of the contents below: 3. Location of Data Storage



4. Deletion
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2.3 Updated some of the contents below:
3. Location of Data Storage and Processing
14. Information for Vulnerability Management
16. Human Security Initiatives
21. Use of Third-Party Service Providers
Other minor revisions not affecting the content.

