

**Testmo GmbH Data Processing Terms**  
for the Customer-Facing DPA

**Details of Processing**

**a. Address:**

Wilhelmine-Gemberg-Weg 11a, 10179  
Berlin, Germany

**b. Type of Services provided by Testmo involving the Processing of Customer Personal Data:**

Testmo offers a comprehensive web-based (i.e. Software as a Service) test case management tool used by leading development teams in the Fortune 500. Testmo product allows users to efficiently manage, track, and organize software testing efforts to boost testing productivity and increase the speed and soundness of software development.

**c. Data Protection Officer (DPO) Details:**

VeraSafe, LLC, a Delaware limited liability company.  
experts@verasafe.com

**d. EU Data Protection Representative:**

n/a

**e. UK Data Protection Representative:**

VeraSafe United Kingdom Ltd.  
37 Albert Embankment London SE1 7TL United Kingdom  
Contact form: <https://verasafe.com/public-resources/contact-data-protection-representative>

**f. Subject matter and duration:**

The subject matter and duration of the Processing of Customer Personal Data are set forth in the Main Agreement and all amendments, exhibits, schedules, task orders, addenda, SOWs, purchase orders and other documents associated therewith and incorporated therein.

**g. Nature and Purpose of Processing:**

The nature and purpose of the Processing of Customer Personal Data are set forth in the Main Agreement and all amendments, exhibits, schedules, task orders, addenda, SOWs, purchase orders and other documents associated therewith and incorporated therein.

**h. Further Processing:**

No further Processing of Customer Personal Data beyond the Processing necessary for the provision of the Services is allowed unless required under applicable law.

**i. Categories of Data Subjects:**

Data subjects may include Customer's representatives, such as employees, contractors, collaborators, partners. Data subject may also include individuals attempting to communicate or transfer Customer Personal Data to users of the Services.

**j. Categories of Customer Personal Data:**

The Categories of Customer Personal Data that Customer authorizes and requests that Testmo Processes include but are not limited to: Personal contact information such as full name, address, mobile number, email address; details including employer name, job title and function, identification numbers and business contact details; goods or services provided; IP addresses and interest data.

**k. Special Categories of Customer Personal Data to be Processed (if applicable) and the applied restrictions to the Processing of these Special Categories of Customer Personal Data:** Not applicable.

**l. Categories of third-party recipients to whom the Customer Personal Data may be disclosed or shared by Testmo:**

Subprocessors; and

Other Testmo Affiliates, if applicable.

**m. Frequency of the Transfer of Customer Personal Data:**

The frequency of the transfer of Customer Personal Data is determined by the Customer. Customer Personal Data is transferred each time that the Customer instructs Testmo to Process Customer Personal Data.

**n. Maximum data retention periods, if applicable:**

The retention period of the Customer Personal Data is generally determined by the Customer and is subject to the term of the DPA and the Main Agreement, respectively, in the context of the contractual relationship between Testmo and the Customer.

**o. The basic Processing activities to which Customer Personal Data will be subject include, without limitation:**

Collection, recording, organization, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction for the purpose of providing the Services to Customer in accordance with the terms of the Main Agreement.

**p. The following is deemed an instruction by the Customer to Testmo to Process Customer Personal Data:**

(a) Processing in accordance with the Main Agreement.

(b) Processing initiated by Data Subjects in their use of the Services.

(c) Processing to comply with other reasonable documented instructions provided by Customer (e.g., via email) where such instructions are consistent with the terms of the Main Agreement.

**q. List of Testmo's Subprocessors is available at <https://www.testmo.com/assets/testmo-subprocessors-list-2024-01-02.pdf>**

- r. Description of technical and organizational security measures implemented by Testmo:**
- i. Measures of pseudonymization and encryption of Customer Personal Data:
    - (a) Encryption in transit: SHA-256 With RSA 2048 Encryption
    - (b) Encryption at rest: AES-256
  - ii. Measures for ensuring ongoing confidentiality, integrity, availability and resilience of Processing systems and services:
    - (a) Restriction of logical access to IT systems that Process transferred Customer Personal Data to those officially authorized persons with an identified need for such access;
    - (b) Regular scanning and monitoring of any unauthorized software applications and IT systems for vulnerabilities of Testmo;
    - (c) Firewall protection of external points of connectivity in Data Importer's network architecture; and
    - (d) Expedited patching of known exploitable vulnerabilities in the software applications and IT systems used by Testmo.
  - iii. Measures for ensuring the ability to restore the availability and access to Customer Personal Data in a timely manner in the event of a physical or technical incident:
    - (a) Advanced Backup System
  - iv. Processes for regularly testing, assessing, and evaluating the effectiveness of technical and organizational measures in order to ensure the security of the Processing
    - (a) Compliance program to track security controls
    - (b) Vulnerabilities are addressed as they are discovered.
  - v. Measures for user identification and authorization:
    - (a) Users set their own passwords to enter the application and these passwords are stored hashed inside the database
    - (b) There is a [custom application permission system](#) to guarantee that users have access only to data that is appropriate to their access level
  - vi. Measures for the protection of data during transmission:
    - (a) SSL
  - vii. Measures for the protection of data during storage:
    - (a) Data is stored using a leading service that ensures high performance, scalability, availability and security by default
    - (b) Access is role based and reviewed regularly.
  - viii. Measures for ensuring physical security of locations at which Customer Personal Data are processed:
    - (a) Restriction of physical access to IT systems that Process transferred Customer Personal Data to those officially authorized persons with an identified need for such access.
    - (b) Physical security is part of the service provided by Amazon Web Services.

- ix. Measures for ensuring events logging:
  - (a) Active monitoring and logging of network and production systems for potential security events, including intrusion.
- x. Measures for ensuring system configuration, including default configuration:
  - (a) Applications use standard configurations and they are scanned against best practices and vulnerabilities
- xi. Measures for internal IT and IT security governance and management:
  - (a) Users are created with only required permissions and access roles
  - (b) Permissions are reviewed and removed regularly
- xii. Measures for certification/assurance of processes and products:
  - (a) Annual penetration testing is performed.
  - (b) Monthly vulnerability scanning.
- xiii. Measures for ensuring data minimization:
  - (a) Data minimization is guaranteed during the design and implementation processes.
- xiv. Measures for ensuring data quality:
  - (a) Customer is responsible for data quality and accuracy since the data is provided by the Customer
- xv. Measures for ensuring limited data retention:
  - (a) Different policies can apply depending on the type of data
- xvi. Measures for ensuring accountability:
  - (a) Documentation about how personal data is processed.
- xvii. Measures for allowing data portability and ensuring erasure:
  - (a) Customers may export instance data in JSON format (details available here: <https://docs.testmo.com/docs/administration/data-exports>). Personal data, such as account registration data, is available in Excel format upon request to [compliance@testmo.com](mailto:compliance@testmo.com).
  - (b) A formal Compliance process for deleting Customer Personal Data by making a request to [compliance@testmo.com](mailto:compliance@testmo.com).
- xviii. Other:
  - a. Internal policies establishing that:
    - i) Where Testmo is prohibited by law from notifying Data Exporter of an order from a public authority for transferred Customer Personal Data, Testmo shall take into account the laws of other jurisdictions and use best efforts to request that any confidentiality requirements be waived to enable it to notify the competent Supervisory Authorities;

- ii) Testmo must require an official, signed document issued pursuant to the applicable laws of the requesting third party before it will consider a request for access to transferred Customer Personal Data;
- iii) Testmo shall scrutinize every request for legal validity and, as part of that procedure, will reject any request Data Importer considers to be invalid; and
- iv) If Testmo is legally required to comply with an order, it will respond as narrowly as possible to the specific request.