Rollbar

System and Organization Controls (SOC) 3
Report on Management's Assertion Related to its

Continuous Code Improvement Platform

Relevant to Security, Availability, Confidentiality

For the Period
June 1, 2021 to May 31, 2022

Together with
Independent Service Auditors' Report

Rollbar

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I. Independent Service Auditors' Report

Independent Service Auditors' Report

To the Management of Rollbar, Inc. (Rollbar)

Scope

We have examined Rollbar's accompanying assertion titled "Assertion of Rollbar Management" (assertion) that the controls within Rollbar's Continuous Code Improvement Platform (system) were effective throughout the period June 1, 2021 to May 31, 2022, to provide reasonable assurance that Rollbar's service commitments and system requirements were achieved based on the trust services criteria relevant to Security, Availability, Confidentiality (applicable trust services criteria) set forth in TSP section 100, *2017 Trust Services Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy* (*trust services criteria*).

Service Organization's Responsibilities

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

Service Auditors' Responsibilities

Our responsibility is to express an opinion, based on our examination, on whether management's assertion that controls within the system were effective throughout the period to provide reasonable assurance that the service organization's service commitments and system requirements were achieved based on the applicable trust services criteria. Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. Those standards require that we plan and perform our examination to obtain reasonable assurance about whether management's assertion is fairly stated, in all material respects. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.
Our examination included:

- Obtaining an understanding of the system and the service organization's service commitments and system requirements.

- Assessing the risks that controls were not effective to achieve Rollbar's service commitments and system requirements based on the applicable trust services criteria.
- Performing procedures to obtain evidence about whether controls within the system were effective to achieve Rollbar'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.

We are required to be independent and to meet our other ethical responsibilities in accordance with relevant ethical requirements relating to the engagement.

Inherent Limitations

There are inherent limitations in the effectiveness of any system of internal control, including the possibility of human error and the circumvention of controls.

Because of their nature, controls may not always operate effectively to provide reasonable assurance that the service organization's service commitments and system requirements were achieved based on the applicable trust services criteria. Also, the projection to the future of any conclusions about the effectiveness of controls is subject to the risk that controls may become inadequate because of changes in conditions or that the degree of compliance with the policies or procedures may deteriorate.

Opinion

In our opinion, management's assertion that the controls within Rollbar's Continuous Code Improvement Platform were effective throughout the period June 1, 2021 to May 31, 2022, to provide reasonable assurance that Rollbar's service commitments and system requirements were achieved based on the applicable trust services criteria is fairly stated, in all material respects.

Sensiba San Filippo LLP

San Jose, California
July 15, 2022

II. Assertion of Rollbar Management

Assertion of Rollbar Management

We are responsible for designing, implementing, operating, and maintaining effective controls within the Rollbar, Inc. (d.b.a. Rollbar) Continuous Code Improvement Platform (system) throughout the period June 1, 2021 to May 31, 2022, to provide reasonable assurance that Rollbar's service commitments and system requirements relevant to security, availability, and confidentiality were achieved. Our description of the boundaries of the system is presented in the section of this report titled, "Rollbar's Description of the System," (description) and identifies the aspects of the system covered by our assertion.

We have performed an evaluation of the effectiveness of the controls within the system throughout the period June 1, 2021 to May 31, 2022, to provide reasonable assurance that Rollbar's service commitments and system requirements were achieved based on the trust services criteria relevant to Security, Availability, Confidentiality (applicable trust services criteria) set forth in TSP section 100, *2017 Trust Services Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy* (AICPA, *Trust Services Criteria*).

Rollbar's objectives for the system in applying the applicable trust services criteria are embodied in its service commitments and system requirements relevant to the applicable trust services criteria. The principal service commitments and system requirements related to the applicable trust services criteria are presented in the accompanying system description.

There are inherent limitations in any system of internal control, including the possibility of human error and the circumvention of controls. Because of these inherent limitations, a service organization may achieve reasonable, but not absolute, assurance that its service commitments and system requirements are achieved.

We assert that the controls within the system were effective throughout the period June 1, 2021 to May 31, 2022, to provide reasonable assurance that Rollbar's service commitments and system requirements were achieved based on the applicable trust services criteria.

Signed by Rollbar Management
July 15, 2022

III. Description of Rollbar's Continuous Code Improvement Platform

Rollbar

Description of Rollbar's Continuous Code Improvement Platform

Company Background

Rollbar, Inc. (Rollbar) was founded in 2012 with the objective of providing a Company Monitoring product for developers which helps them deliver high quality software quickly and painlessly. These solutions are delivered via a Software as a Service model. The organization is based in San Francisco, CA, with satellite offices in Barcelona and Budapest.

The Rollbar production environment has been developed to be consistent with the ISO 27001 standard.

Industries served by Rollbar include Financial Services, Telecommunications, Legal Services, Advertising, Manufacturing, Healthcare, Retail, Educational institutions, and Government agencies.

Services Provided

Rollbar provides Continuous Code Improvement Platform services to software developers which helps them deliver high quality software quickly and painlessly by providing them real-time visibility, proactive triaging, Root Cause Analysis, Application Instrumentation for various languages and platforms and seamless integrations with developer tools.

Rollbar's core application is a cloud-based, multi-user, Software as a Service (SaaS) application. It enables processing of the following tasks related to software development:
Grouping Errors - Capturing and grouping occurrences of errors and messages into Items so that developers can accurately understand which are new vs. recurring, and the impact of each error (number of users affected, etc.).

Message Patterns - Rollbar has a database of well-known exception message patterns used by popular libraries and frameworks. Rollbar's grouping algorithm recognizes these exception messages and considers the patterns when computing the fingerprint.

Reporting errors - Rollbar SDKs for popular programming languages and platforms provide one or more ways to capture and transmit errors via the Rollbar API.

Real-time Visibility - Rollbar supports several messaging and incident management tools where your team can get notified about errors and important events. Rollbar provides a fingerprinting service to improve signal-to-noise ratio.

Root Cause Analysis - Rollbar can trace all the data you need to debug, including request params, local var values, browsers, IPs, and more. Rollbar provides a Telemetry feature to retrace browser events leading up to an error.

Seamless Integration with Developer tools - Rollbar provides seamless integration with developer tools such as source code control system, issue management for proactive triaging, and People tracking.

Principal Service Commitments and System Requirements

Rollbar designs its processes and procedures related to their Continuous Code Improvement Platform services to meet its objectives for its customers, compliances, and employees. Those objectives are based on the service commitments that Rollbar makes to user entities, the laws and regulations that govern the provision of Continuous Code Improvement Platform services, and the financial, operational, and compliance requirements that Rollbar has established for the services. The Continuous Code Improvement Platform services of Rollbar are subject to the security and privacy requirements of ISO 27001 as well as the Health Insurance Portability and Accountability Act Administrative Simplification, as amended, including relevant regulations, as well as state privacy security laws and regulations in the jurisdictions in which Rollbar operates.

Security 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 commitments are standardized and include, but are not limited to, the following:

• Security principles within the fundamental designs of the Continuous Code Improvement Platform services 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
• Use of encryption technologies to protect customer data both at rest and in transit

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

Components of the System

Infrastructure

The primary infrastructure used to provide Rollbar's Continuous Code Improvement Platform services system includes the following:

Primary Infrastructure	
Hardware	Purpose
GCP Virtual Machines	Run databases, caches, internal utilities, application code (web/api/workers)
GCP Load Balancers	Route customer traffic to both Kubernetes and VMs.
GCP MemoryStore	Caches customer data for application use.
GCP Kubernetes Engine	Runs application code, internal tools and utilities.
GCP Dataproc	Runs data analytics jobs on customer data.

Software

The primary software used to provide Rollbar's Continuous Code Improvement Platform services system includes the following:

Primary Software	
Software	Purpose
Quip	Documentation of service configuration details, policies, procedures, and general business use cases (e.g.internal helpdesk documentation).
Shortcut	SDLC and Project Initiative management and tracking.
Zendesk	Ticketing system for reporting, tracking, and resolving customer issues and requests.
GitHub	Distributed version control system for tracking changes in source code during software development.
Statuspage	Online communication platform to inform customers of past and ongoing incidents, outages and performance issues
CircleCI	Continuous Integration platform to build, test and validate our software releases
MailGun	Email marketing platform to send email programmatically in a safe and secure way

Primary Software	
Periscope	Platform to create and manage data pipeline with the goal of delivering business analytics and dashboards
Codacy	Static analysis tool to inspect and validate source code automatically
DataDog	Monitoring system for all the different cloud components involved in our infrastructure
PagerDuty	Alerting system to automatically escalate incident response to the engineers on call
Amplitude	Business analytic platform with configurable dashboards, events and segmentation
Readme	Online documentation portal to host product documentation
LaunchDarkly	Feature-flag platform to control progressive releases of new functionalities

People

Rollbar employees are organized in the following functional areas:

- Corporate. Executives, senior revenue operations staff, and company administrative support staff, such as training, accounting, finance, sales, marketing, human resources, and facilities. These individuals use the Rollbar software primarily as a tool to measure performance at an overall corporate level. This includes reporting done for internal metrics as well as for Rollbar's user entities.

- The software development staff develops and maintains the custom software for Rollbar. This includes the Rollbar application and associated SDKs, supporting utilities, and the external websites that interact with Rollbar. The staff includes software engineers, database administration, system administrators, User Interface Designers, Operations engineers and product/program managers.

- Customer Success staff collects customer requests directly from Rollbar users. These requests are entered into the customer support tool and get prioritized and addressed. In addition, customer success staff represents the voice of customers, maintains customer relationships and collects customer feedback and works with software development staff to increase customer satisfaction.

- IT. Help desk, IT infrastructure, IT system administration, Information Security & Compliance personnel manage electronic interfaces, security, compliance and business implementation support.

- The help desk group provides technical assistance to the Rollbar employees.

- The information security staff supports Rollbar by monitoring internal and external security threats, obtaining, and maintaining compliance, managing vendor security and maintaining security software.

- The IT staff maintains the inventory of IT assets and manages the entire IT asset lifecycle including procurement, repair, and retirement.

- The infrastructure, networking, and systems administration staff typically has no direct use of the Rollbar software. Rather, it supports Rollbar's IT infrastructure, which is used by the software. Operations engineers will deploy the releases of the Rollbar software and other dependent software into the production environment. This group does not directly use the Rollbar software, but it provides infrastructure support, maintains business continuity as well as provides disaster recovery assistance.

Data

Data, as defined by Rollbar, constitutes the following:
- User and organization account metadata

- Raw data provided by customers

- Logs of internal systems

- Internal monitoring data related to infrastructure operations

- Internal documentation

Users sign up to the SaaS product through a web interface and configure their accounts for the team and organization. Customers then integrate the Rollbar SDK with their codebase resulting in their applications sending the Rollbar SaaS product information about errors and log events that are happening in the Customer's applications. This data is received by the SaaS product, processed, indexed into various databases and made available to the Rollbar Web Application to provide the Continuous Code Improvement Platform. Customer Success staff collects customer requests directly from Rollbar users. These requests are entered into the customer support tool and get prioritized and addressed. In addition, customer success staff represents the voice of customers, maintains customer relationships and collects customer feedback and works with software development staff to increase customer satisfaction.

Internal databases, virtual machines, and logs are only accessible by employees who require access in order to fulfill their role. Access to customer data is only provided to employees after they have received the required HIPAA training and only through secure mechanisms such as VPN tunnels.

Internal documentation is available for all full-time employees and is stored and maintained in 3rd party services such as Google Drive, Quip, and other SaaS solutions.

Processes, Policies and Procedures

Formal IT policies and procedures exist that describe physical security, logical access, computer operations, change control, and data communication standards. All teams are expected to adhere to the Rollbar policies and procedures that define how services should be delivered. These are located on the Company's intranet and can be accessed by any Rollbar team member.

Boundaries of the System

The scope of this report includes the Continuous Code Improvement Platform services system performed in the US based Rollbar facilities. This report does not include the data center hosting services provided by GCP.

Control Environment

Integrity and Ethical Values

Rollbar maintains four core values: honesty, transparency, dependability, and pragmatism, which serve as the foundation for the company's behavioral standards. These core values are stated company-wide at every All Hands meeting and discussed in depth throughout the year to remind employees of their importance to the company and its success.

Commitment to Competence

Rollbar's management defines the required skills necessary to accomplish tasks that define an employee's role and core competency. Management considers the core skill level for all employee roles and job functions.

Management's Philosophy and Operating Style

Rollbar's management philosophy is built upon the mission to operate within a team-oriented environment. Leadership strives to maintain open and transparent communications with all employees regarding operations and performance.

Rollbar's management philosophy and operating style encompass a broad range of characteristics. Such characteristics may include the approach to taking and monitoring business risks; attitudes and actions toward financial reporting; use of policies and procedures; and emphasis on planning and meeting budget, profit, and other financial and operating goals.

Organizational Structure and Assignment of Authority and Responsibility

Rollbar's organizational structure provides the framework within which its activities for achieving entity-wide objectives are planned, executed, controlled, and monitored.

Management believes establishing a relevant organizational structure includes considering key areas of authority and responsibility. An organizational structure has been developed to suit its needs. This organizational structure is based, in part, on its size and the nature of its activities.

Human Resource Policies and Practices

Rollbar's People and Talent Teams support policies and practices to ensure Rollbar meets and exceeds hiring standards and maintains maximal employee engagement and retention. This function serves new hire pre-boarding and onboarding, in addition to existing employee evaluation, career progression, and biannual compensation reviews.

Risk Assessment Process

Rollbar's risk assessment process identifies and manages risks that could potentially affect Rollbar's ability to provide reliable services to user organizations. This ongoing process requires that management identify significant risks inherent in products or services as they oversee their areas of responsibility. Rollbar identifies the underlying sources of risk, measures the impact to the organization, establishes acceptable risk tolerance levels, and implements appropriate measures to monitor and manage the risks.

This process has identified risks resulting from the nature of the services provided by Rollbar, and management has implemented various measures designed to manage these risks. Risks identified in this process include the following:

- Operational risk – changes in the environment, staff, or management personnel

- Strategic risk - new technologies, changing business models, and shifts within the industry

- Compliance – legal and regulatory changes

Rollbar has assigned Information Security for identifying security and compliance risks to the entity and monitoring the operation of the firm's internal controls. The approach is intended to align the entity's strategy more closely with its key stakeholders, assist the organizational units with managing uncertainty more effectively, minimize threats to the business, and maximize its opportunities in the rapidly changing market environment. Rollbar attempts to actively identify and mitigate significant risks through the implementation of various initiatives and continuous communication with other leadership committees and senior management. Rollbar has created a Risk Assessment & Management Program which includes Risk Assessment & Management Policy.

<u>Integration with Risk Assessment</u>

The environment in which the system operates; the commitments, agreements, and responsibilities of the Rollbar system; as well as the nature of the components of the system result in risks that the criteria will not be met. Rollbar addresses these risks through the implementation of suitably designed controls to provide reasonable assurance that the criteria are met. Because each system and the environment in which it operates are unique, the combination of risks to meeting the criteria and the controls necessary to address the risks will be unique. As part of the design and operation of the system, Rollbar's management identifies the specific risks that the criteria will not be met and the controls necessary to address those risks.

Information and Communications Systems

Information and communication is an integral component of Rollbar's internal control system. It is the process of identifying, capturing, and exchanging information in the form and time frame necessary to conduct, manage, and control the entity's operations. This process encompasses the primary classes of transactions of the organization, including the dependence on, and complexity of, information technology. At Rollbar, information is identified, captured, processed, and reported by various information systems, as well as through conversations with clients, vendors, regulators, and employees.

Departmental, functional, and project specific meetings are held to discuss operational efficiencies within the applicable areas and to disseminate new policies, procedures, controls, and other strategic initiatives within the organization. Additionally, all hands meetings are held every two weeks to provide employees with updates on the company and key initiatives affecting the organization and its employees. Senior executives lead the All Hands meetings with information gathered from formal automated information systems and informal databases, as well as questions and conversations with colleagues. General updates to entity-wide security policies and procedures are usually communicated to the appropriate Rollbar personnel via email and instant messages.

Monitoring Controls

Management monitors controls to ensure that they are operating as intended and that controls are modified as conditions change. Rollbar's management performs monitoring activities to continuously assess the quality of internal control over time. Necessary corrective actions are taken as required to correct deviations from company policies and procedures. Employee activity and adherence to company policies and procedures is also monitored. This process is accomplished through ongoing monitoring activities, separate evaluations, or a combination of the two.

Changes to the System

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

Incidents

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

Criteria Not Applicable to the System

All relevant trust services criteria were applicable to Rollbar's Continuous Code Improvement Platform.

Subservice Organizations

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

The following subservice organization controls should be implemented by GCP to provide additional assurance that the trust services criteria described within this report are met.

Subservice Organization – GCP		
Category	Criteria	Control
Common Criteria / Security	CC6.4	Physical protection and guidelines are described in the Physical Security Policy, Data Security Policy, Google Photography Policy, and the Data Center Access policy.
		Data center server floors, network rooms, and security systems are physically isolated from public spaces and/or delivery areas.
		Access to sensitive data center zones requires approval from authorized personnel and is controlled via badge readers, biometric identification mechanisms, and/or physical locks.
		Visitors to data center facilities must gain approval from authorized personnel, have their identity verified at the perimeter, and remain with an escort for the duration of their visit.
		Data center perimeters are defined and secured via physical barriers.

Subservice Organization – GCP		
Category	Criteria	Control
		Access lists to high-security areas in data centers are reviewed on a periodic basis and inappropriate access is removed in a timely manner.
		Security measures utilized in data centers are assessed annually and the results are reviewed by executive management.
		Data centers are continuously staffed and monitored by security personnel using real-time video surveillance and/or alerts generated by security systems.
Availability	A1.2	Critical power and telecommunications equipment in data centers is physically protected from disruption and damage.
		Redundant power is utilized to support the continued operation of critical data center equipment in the event of a loss of the primary power source(s).
		Data centers are equipped with fire detection alarms and protection equipment.
		The organization's information processing resources are distributed across distinct, geographically dispersed processing facilities to support service redundancy, and availability.
		Backups are periodically performed to support the availability of customer data.
		Restore tests are periodically performed to confirm the ability to recover customer data.
		The organization conducts disaster recovery (DR) testing on an ongoing basis (and at least annually) to enable infrastructure and application teams to test communication plans, fail-over scenarios, operational transition, and other emergency responses. Participating teams create testing plans and document the results and lessons learned from the tests.

Rollbar, Inc. management, along with the subservice organization, define the scope and responsibility of the controls necessary to meet all the relevant trust services criteria through written contracts, such as service level agreements. In addition, Rollbar, Inc. performs monitoring of the subservice organization controls, including the following procedures:

- Holding periodic discussions with vendors and subservice organization
- Reviewing attestation reports over services provided by vendors and subservice organization
- Monitoring external communications, such as customer complaints relevant to the services by the subservice organization

Complementary User Entity Controls

Rollbar's services are designed with the assumption that certain controls will be implemented by user entities. Such controls are called complementary user entity controls. It is not feasible for all the SOC 2 Criteria related to Rollbar's services to be solely achieved by Rollbar's control procedures. Accordingly, user entities, in conjunction with the services, should establish their own internal controls or procedures to complement those of Rollbar's.

The following complementary user entity controls should be implemented by user entities to provide additional assurance that the SOC 2 Criteria described within this report are met. As these items represent only a part of the control considerations that might be pertinent at the user entities' locations, user entities' auditors should exercise judgment in selecting and reviewing these complementary user entity controls.

1. User entities are responsible for understanding and complying with their contractual obligations to Rollbar.
2. User entities are responsible for notifying Rollbar of changes made to technical or administrative contact information.
3. User entities are responsible for maintaining their own system(s) of record.
4. User entities are responsible for ensuring the supervision, management, and control of the use of Rollbar services by their personnel.
5. User entities are responsible for developing their own disaster recovery and business continuity plans that address the inability to access or utilize Rollbar services.
6. User entities are responsible for providing Rollbar with a list of approvers for security and system configuration changes for data transmission.
7. User entities are responsible for immediately notifying Rollbar of any actual or suspected information security breaches, including compromised user accounts, including those used for integrations and secure file transfers.