

# **TECHNICAL AND ORGANIZATIONAL MEASURES FOR RESCUE LIVE LENS**

**Security and Privacy Operational Controls**

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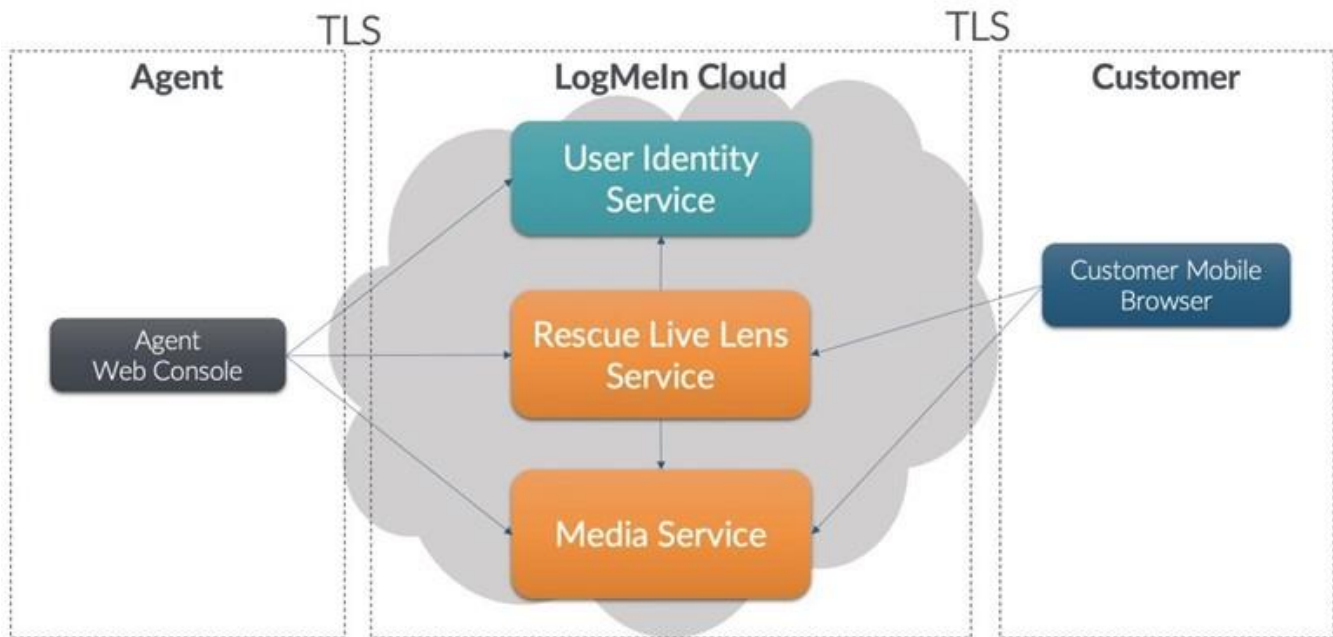
# 1 Products and Services

This document focuses on the Technical and Organizational Measures (TOMs) of the Rescue Live Lens infrastructure and communications channels. Rescue Live Lens enables IT and support agents to deliver audiovisual remote support to mobile devices with camera share from a web-based agent console.

Rescue Live Lens employs robust data security measures in order to defend against both passive and active attacks.

# 2 Product Architecture

Rescue Live Lens uses an application service provider (ASP) model designed to provide secure operations while integrating with a company’s existing network and security infrastructure. Its architecture is designed for optimal performance, reliability and scalability. Redundant switches and routers are built into the architecture and intended to ensure that there is no single point of failure. High-capacity, clustered servers and backup systems are utilized in order to ensure continued operation of application processes in the event of a heavy load or system failure. Service brokers load balance the client/server sessions across geographically distributed communication servers. The communications architecture for Rescue Live Lens is depicted in Section 2.1 below.



## 2.1. Communications Architecture

Agent authentication utilizes the GoTo User Identity Service. Communication between participants in a Rescue Live Lens Session occurs via an overlay networking stack that logically sits on top of the conventional UDP and TCP/IP. This network is provided by Rescue Live Lens and Media Service hosted in Amazon AWS.

Rescue Live Lens Session participants (Agent Web Console and Customer Mobile Browser) communicate with Rescue Live Lens and Media Service using outbound TCP connections on port 443 or UDP port 15000, depending on availability. Because Rescue Live Lens is a web-based service, participants can be located nearly anywhere on the Internet — at a remote office, at home, at a business center or connected to another company's network.

# 3 Rescue Live Lens Technical Security Controls

GoTo employs industry standard technical security controls appropriate to the nature and scope of the Services (as the term is defined in the Terms of Service) designed to safeguard the Service infrastructure and data residing therein. Find the Terms of Service at <https://www.goto.com/company/legal/terms-and-conditions>.

## 3.1. Authentication

Rescue Live Lens Agents and Account Administrators are identified by their email address and authenticated using a password. During authorized authentication, the password is not transmitted by GoTo in an unencrypted state.

Authentication procedures are governed by the following policies:

**Strong passwords:** A strong password must be a minimum of eight (8) characters in length with appropriate complexity requirements (i.e., must contain both letters and numbers). Passwords are checked for strength when established or changed.

**Two-Factor Authentication:** As an additional security measure, optional two-factor authentication is available for every Rescue Live Lens technician group account. If enabled, two-factor authentication requires every user to authorize access via two separate methods.

**Account lockout:** After five consecutive failed log-in attempts, the user account is put into a mandatory soft-lockout state. This means that the user account holder will not be able to log-in for five minutes. After the lockout period expires, the user account holder will be able to attempt to log-in to his or her account again.

## 3.2. Logical Access Control

Logical access control procedures are in place, designed to prevent or mitigate the threats of unauthorized application access and data loss in corporate and production environments. Employees are granted minimum (or “least privilege”) access to specified GoTo systems,

applications, networks, and devices as needed. Further, user privileges are segregated based on functional role and environment.

Users authorized to access Rescue Live Lens product components may include GoTo's authorized technical staff (e.g., Technical Operations and Engineering DevOps), customer administrators, or end-users of the product. On-premise production servers are only available from jump hosts or through the Operations virtual private network (VPN). Cloud-based production components are available through SSU (Self Service Unix) authentication.

### 3.3. Permission Based Access Control

#### 3.3.1. Camera Share Session

An essential part of Rescue Live Lens security is its permission-based access control model designed to protect access to the Customer's camera and microphone. During Live Lens support sessions, the Customer is prompted for permission before initiation of any access to their camera or microphone.

### 3.4. Role Based Access Control

Rescue Live Lens provides access to a variety of resources and services using a role-based access control system that is enforced by its various service delivery components. The following roles are defined:

**Account Administrator:** Rescue Live Lens user with full admin privileges to perform administrative functions pertaining to Agents. Account administrators can create, modify and delete Agent accounts and modify subscription data.

**Agent:** Rescue Live Lens user. The agent is able to initiate Live Lens Sessions in order to provide assistance to Customers via camera share.

**Customer:** Unauthenticated person requesting support from the Agent. The Customer can close sessions and must grant permissions for the Agent to access his/her device.

### 3.5. Perimeter Defense and Intrusion Detection

GoTo employs industry standard perimeter protection tools, techniques and services that are designed to prevent unauthorized network traffic from entering its product infrastructure. The GoTo network features externally facing firewalls and internal network segmentation. Cloud resources also utilize host-based firewalls.

### 3.6. Data Segregation

GoTo leverages a multi-tenant architecture, logically separated at the database level, based on a user's or organization's GoTo account. Only authenticated parties are granted access to relevant accounts.

### 3.7. Physical Security

GoTo contracts with datacenters to provide physical security and environmental controls for server rooms that house production servers. These controls include:

- Video surveillance and recording
- Multi-factor authentication to highly sensitive areas
- Heating, ventilation and air conditioning temperature control
- Fire suppression and smoke detectors
- Uninterruptible power supply (UPS)
- Raised floors or comprehensive cable management
- Continuous monitoring and alerting
- Protections against common natural and man-made disasters, as required by the geography and location of the relevant data center
- Scheduled maintenance and validation of all critical security and environmental controls

GoTo limits physical access to production datacenters to only authorized individuals. Access to an on-premise server room or third-party hosting facility requires the submission of a request through the relevant ticketing system and approval by the appropriate manager, as well as review and approval by Technical Operations. GoTo management reviews physical access logs to datacenters and server rooms on at least a quarterly basis. Additionally, physical access to datacenters is removed upon termination of previously authorized personnel.

### 3.8. Data Backup, Disaster Recovery, Availability

GoTo's architecture is designed to perform replication in near-real-time to geographically diverse locations. Databases are backed up using a rolling incremental backup strategy. In the event of a disaster or total site failure in any one of the multiple active locations, the remaining locations are designed to balance the application load. Disaster recovery related to these systems is tested periodically.

### 3.9. Encryption

GoTo maintains a cryptographic standard that aligns with recommendations from industry groups, government publications, and other reputable standards groups. The cryptographic standard is periodically reviewed, and selected technologies and ciphers may be updated in accordance with the assessed risk and market acceptance of new standards.

Key points regarding encryption in Rescue Live Lens include:

- Rescue Live Lens session data is protected with up to Transport Layer Security (TLS) 1.2 (if supported) 256-bit AES encryption in transit.
- Session keys are generated server-side by the Agent and remain there in order to be able to connect the Customer to the Agent. The service is designed to ensure that these keys are never exposed or visible to the public.
- Encrypted communication between the Customer and the Agent in Rescue Live Lens occurs via the Media Service.
- Endpoints within the Rescue Live Lens infrastructure use TLS connections.

### 3.9.1. In-Transit Encryption

To further safeguard Customer Content (as the term is defined in the Terms of Service) while in transit, GoTo uses current TLS protocols and associated cipher suites.

Customer Endpoint and backend communication are encrypted via OpenSSL. Communications security controls based on strong cryptography are implemented on the TCP layer via TLS standard solutions.

Strong authentication measures are utilized in order to help reduce the likelihood of would-be attackers masquerading as infrastructure servers or inserting themselves into the middle of support session communications.

To provide protection against eavesdropping, modification or replay attacks, IETF-standard TLS protocols are used to protect all communication between endpoints and our services. All session related data are encrypted in transit with up to TLS 1.2, if supported (2048-bit RSA, AES256 strong encryption ciphers with 384-bit SHA-2 algorithm).

GoTo also advises that Agents configure their browsers to use strong cryptography by default whenever possible, in order to increase technical safeguards on the Agent's machine, and to always install the latest operating system and browser security patches.

When connections are established to the Rescue Live Lens website and between Rescue Live Lens components, GoTo servers authenticate themselves to clients using GlobalSign public key certificates. Server-to-server APIs are accessible only within GoTo's private network behind robust firewalls.

### 3.9.2. At-Rest Encryption

Rescue Live Lens configurations, all session data, and recording files are encrypted at rest with 256-bit AES encryption.

### 3.9.3. TCP Layer Security

Internet Engineering Task Force (IETF)-standard TLS protocols are used in order to protect communication between endpoints.

For their own protection, GoTo recommends that all users configure their browsers to use strong cryptography by default whenever possible, and to ensure that operating system and browser security patches are kept up to date.

## 3.10. Vulnerability Management

Ensuring the safety and protection of GoTo Customer's Content and systems is top priority. GoTo implements various security measures throughout the lifecycle of all its products. Security aspects are considered and taken into account during development and operations of Rescue Live Lens.

Dynamic and static application vulnerability testing, as well as Security assessment testing activities for targeted environments, are also performed periodically. Relevant vulnerabilities are

also communicated and managed with monthly and quarterly reports provided to development teams, as well as management.

#### 3.10.1. Security Team

GoTo's Security team continuously monitors product development and operations in close collaboration with the product engineers in order to keep Rescue Live Lens secure and prevent or reduce the likelihood for possible risks.

#### 3.10.2. Internal and External Audits

GoTo's internal audit process includes regular security assessments at both the infrastructure and software level. Internal audits are complemented by various independent external assessments to ensure that GoTo maintains industry standards.

#### 3.11. Logging and Alerting

GoTo collects identified anomalous or suspicious traffic into relevant security logs in applicable production systems.

## 4 Organizational Controls

GoTo maintains a comprehensive set of organizational and administrative controls in order to protect the security and privacy posture of the Rescue Live Lens product.

### 4.1. Security Policies and Procedures

GoTo maintains a comprehensive set of security policies and procedures aligned with business goals, compliance programs, and overall corporate governance. These policies and procedures are periodically reviewed and updated as necessary to ensure ongoing compliance.

### 4.2. Standards Compliance

GoTo complies with applicable legal, financial, data privacy, and regulatory requirements, and conforms with the following compliance certification(s) and external audit report(s):

- American Institute of Certified Public Accountants (AICPA) Service Organization Control (SOC) 2 Type II attestation report incl. BSI Cloud Computing Catalogue (C5)
- Payment Card Industry Data Security Standard (PCI DSS) compliance for GoTo's eCommerce and payment environments
- Internal controls assessment as required under a Public Company Accounting Oversight Board (PCAOB) annual financial statements audit
- TRUSTe Enterprise Privacy & Data Governance Practices Certification to address operational privacy and data protection controls that are aligned with key privacy laws and recognized privacy frameworks. To learn more, please visit our [blog post](#).

### 4.3. Security Operations and Incident Management

GoTo's Security Operations Center (SOC) is staffed by the Security Operations team and is responsible for detecting and responding to security events. The SOC uses security sensors and analysis systems to identify potential issues and has developed an Incident Response Plan that dictates appropriate responses.

The Incident Response Plan is aligned with GoTo's critical communication processes, the Information Security Incident Management Policy, as well as associated standard operating procedures. It is designed to manage, identify and resolve suspected or identified security events across its systems and Services, including Rescue Live Lens. Per the Incident Response Plan, technical personnel are in place to identify potential information security-related events and vulnerabilities and to escalate any suspected or confirmed events to management, where appropriate. Employees can report security incidents via email, phone and/or ticket in accordance with the process documented on the GoTo intranet site. All identified or suspected events are documented and escalated via standardized event tickets and triaged based upon criticality.

### 4.4. Application Security

GoTo's application security program is based on the Microsoft Security Development Lifecycle (SDL) to secure product code. The core elements of this program are manual code reviews, threat modeling, static code analysis and system hardening.

### 4.5. Personnel Security

Background checks, to the extent permitted by applicable law and as appropriate for the position, are performed globally on new employees prior to the date of hire. Results are maintained within an employee's job record. Background check criteria will vary depending upon the laws, job responsibility and leadership level of the potential employee and are subject to the common and acceptable practices of the applicable country.

### 4.6. Security Awareness and Training Programs

New hires are informed of security policies and the GoTo Code of Conduct and Business Ethics at orientation. Mandatory annual security and privacy training is provided to relevant personnel and managed by Talent Development with support from the Security and Privacy Teams.

GoTo employees and temporary workers are informed regularly about security and privacy guidelines, procedures, policies and standards through various mediums including new hire onboarding kits, awareness campaigns, webinars with the CISO, a security champion program, and the display of posters and other collateral, rotated at least bi-annually, that illustrate methods for securing data, devices, and facilities.



## 5 Privacy Practices

GoTo takes the privacy of its Customers, the subscribers to the GoTo Services, and end users very seriously and is committed to disclosing relevant data handling and management practices in an open and transparent manner.

### 5.1. GDPR

The General Data Protection Regulation (GDPR) is a European Union (EU) law on data protection and privacy for individuals within the European Union. GDPR aims primarily to give control to its citizens and residents over their personal data and to simplify the regulatory environment across the EU. Rescue Live Lens is compliant with the applicable provisions of GDPR. For more information, please visit <https://www.goto.com/company/trust/privacy>.

### 5.2. CCPA

GoTo hereby represents and warrants that it is in compliance with the California Consumer Privacy Act (CCPA). For more information, please visit <https://www.goto.com/company/trust/privacy>.

### 5.3. Data Protection and Privacy Policy

GoTo is pleased to offer a comprehensive, global [Data Processing Addendum](#) (DPA), available in English and German, to meet the requirements of the GDPR, CCPA, and beyond and which governs GoTo's processing of Personal Data.

Specifically, our DPA incorporates several GDPR-focused data privacy protections, including: (a) data processing details, sub-processor disclosures, etc. as required under Article 28; (b) EU Standard Contractual Clauses (also known as the EU Model Clauses); and (c) inclusion of GoTo's technical and organizational measures. Additionally, to account for CCPA coming into force, we have updated our global DPA to include: (a) revised definitions which are mapped to CCPA; (b) access and deletion rights; and (c) warranties that GoTo will not sell our users' 'personal information.'

For visitors to our webpages, GoTo discloses the types of information it collects and uses to provide, maintain, enhance, and secure its Services in its [Privacy Policy](#) on the public website. The company may, from time to time, update the Privacy Policy to reflect changes to its information practices and/or changes in applicable law, but will provide notice on its website for any material changes prior to any such change taking effect.

Rescue Live Lens's Data Residency Option allows you to choose where to store end-user data: either within the European Union (Frankfurt, Dublin) or in the USA. GoTo guarantees that those choosing data residency within the EU will only connect to datacenters within the EU and that customer data remains solely within the chosen region.

## 5.4. Transfer Frameworks

GoTo has a robust global data protection program which takes into account applicable law and supports lawful international transfers under the following frameworks:

### 5.4.1. Standard Contractual Clauses

The Standard Contractual Clauses (or “SCCs”) are standardized contractual terms, recognized and adopted by the European Commission, whose primary purpose are to ensure that any personal data leaving the European Economic Area (“EEA”) will be transferred in compliance with EU data-protection law. GoTo has invested in a world-class data privacy program designed to meet the exacting requirements of the SCCs for the transfer of personal data. GoTo offers customers SCCs, sometimes referred to as EU Model Clauses, that make specific guarantees around transfers of personal data for in-scope GoTo services as part of its global DPA. Execution of the SCCs helps ensure that GoTo customers can freely move data from the EEA to the rest of the world.

### *Supplemental Measures*

In addition to the measures specified in these TOMs, GoTo has created the following [FAQ](#) designed to outline its supplemental measures utilized to support lawful transfers under Chapter 5 of the GDPR and address and guide any “case-by-case” analyses recommended by the European Court of Justice in conjunction with the SCCs.

### 5.4.2. APEC CBPR and PRP Certifications

GoTo has additionally obtained Asia-Pacific Economic Cooperation (“APEC”) Cross-Border Privacy Rules (“CBPR”) and Privacy Recognition for Processors (“PRP”) certifications. The APEC CBPR and PRP frameworks are the first data regulation frameworks approved for the transfer of personal data across APEC-member countries and were obtained and independently validated through TrustArc, an APEC-approved third-party leader in data protection compliance.

## 5.5. Return and Deletion of Customer Content

At any time, Rescue Live Lens Customers may request the return or deletion of their Content through standardized interfaces. If these interfaces are not available or GoTo is otherwise unable to complete the request, GoTo will make a commercially reasonable effort to support the Customer, subject to technical feasibility, in the retrieval or deletion of their Content. Customer Content for Rescue Live Lens will be deleted within thirty (30) days of a Customer’s request. Customers’ Rescue Live Lens Content shall automatically be deleted within ninety (90) days after the expiration or termination of their final subscription term. Upon written request, GoTo will certify to such Content deletion.

## 5.6. Sensitive Data

While GoTo aims to protect all Customer Content, regulatory and contractual limitations require us to restrict the use of the Rescue Live Lens for certain types of information. Unless Customer has written permission from GoTo, the following data must not be uploaded to or generated in Rescue Live Lens (by Customer or their end-users):

- Government-issued identification numbers and images of identification documents.
- Information related to an individual's health, including, but not limited to, Protected Health Information (PHI) identified in the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and related laws and regulations.
- Information related to financial accounts and payment instruments, including, but not limited to, credit card data. The only general exception to this provision extends to explicitly identified payment forms and pages that are used by GoTo to collect payment for Rescue Live Lens.
- Any information especially protected by applicable laws and regulation, specifically information about individual's race, ethnicity, religious or political beliefs, organizational memberships, etc.

### 5.7. Tracking and Analytics

GoTo is continuously improving its websites and products using third-party web analytics tools which help GoTo understand how visitors use its websites, desktop tools, and mobile applications, as well as user preferences and problems. For further details please reference the [Privacy Policy](#).

## 6 Third Parties

### 6.1. Use of Third Parties

As part of the internal assessment and processes related to vendors and third parties, vendor evaluations may be performed by multiple teams depending upon relevancy and applicability. The Security team evaluates relevant vendors that provide information security-based services including the evaluation of third-party hosting facilities. GoTo's Legal and Procurement teams may evaluate contracts, Statements of Work (SOW) and service agreements, as necessary per internal processes. Appropriate compliance documentation or reports may be obtained and evaluated at least annually, as deemed appropriate, to ensure the control environment is functioning adequately and any necessary user consideration controls are addressed. In addition, third parties that host or that are granted access to sensitive or confidential data by GoTo are required to sign a written contract outlining the relevant requirements for access to, or storage or handling of, the information (as applicable).

### 6.2. Contract Practices

To ensure business continuity and that appropriate measures are in place, intended to protect the confidentiality and integrity of third-party business processes and data processing, GoTo reviews relevant third parties' terms and conditions and either utilizes GoTo-approved procurement templates or negotiates, in collaboration with Security, Legal, Procurement, and Finance (in each case, as appropriate) such third-party terms, where deemed necessary.

## 7 Contacting GoTo

Customers can contact GoTo at <https://support.goto.com> for general inquiries or [privacy@goto.com](mailto:privacy@goto.com) for privacy-related questions.

## 8 Appendix – Terminology

**Agent:** Rescue Live Lens user who creates Rescue Live Lens Sessions in order to provide audiovisual assistance to Customers via camera share.

**Agent Web Console:** A web-based application that runs on the Agent's PC, Mac, Tablet or Chromebook devices in any of the supported browsers (Chrome, Firefox, Safari) and connects to the Rescue Live Lens Service. It enables the Agent to create and conduct Live Lens camera sharing Support Sessions as well as various account management, service management and reporting functions.

**Support Session:** For Rescue Live Lens, the support session is when the Agent and Customer are connected through the Rescue Live Lens Service to experience camera sharing to allow the Agent to assist the Customer.

**Customer:** The person receiving support from the Agent via a Rescue Live Lens Support Session.

**Customer Mobile Browser:** A web-based application that runs in any supported browser on the Customer's computer/mobile device and connects to a Rescue Live Lens Session through the Rescue Live Lens Service. It can provide camera share capabilities along with annotation, VOIP.

**Media Service:** A fleet of load-balanced, globally distributed servers providing a variety of high availability unicast and multicast communication services based on WebRTC protocols.

**Rescue Live Lens Service:** A fleet of load-balanced, globally distributed servers providing secure access for the Agent Web Console and Customer Mobile Browser through encrypted web socket connection and API calls.