



TRUST PACKAGE

PRIVACY, SECURITY AND COMPLIANCE

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INTRODUCTION

Blackline Safety (Blackline) is committed to upholding the highest standards of customer privacy and data security. We adhere to industry best practices to safeguard customer data, ensuring its utmost protection. In our continuous efforts to establish trust, we offer customers a comprehensive security documentation package that addresses frequently asked questions and concerns related to security. For any additional inquiries or information, please do not hesitate to reach out to us via phone or email. Your trust and data security are our top priorities.

ABOUT BLACKLINE SAFETY

Blackline is a technology leader driving innovation in the industrial workforce through safety IoT (Internet of Things) solutions. With connected safety devices and predictive analytics, Blackline helps companies drive towards zero safety incidents and improved operational performance. Blackline provides wearable devices, personal and area gas monitoring, cloud-connected software, and data analytics to meet demanding safety challenges and enhance overall productivity for organizations with coverage in more than 100 countries. Equipped with cellular and satellite connectivity, Blackline provides a lifeline to tens of thousands of people, having processed over 250 billion data points and initiated over eight million emergency alerts. Blackline offers an optional 24/7 live monitoring Safety Operations Center (SOC) to provide organizations with real-time coverage and peace of mind to keep workers safe around the clock. Our in-house SOC and global monitoring partners ensure professional and reliable safety monitoring and emergency response management.

BACKGROUND

This trust document explains Blackline’s commitment to security, privacy and compliance. It covers the purpose of Blackline’s products and services, the information we process or store for you, and the importance of our service availability to your business. Additionally, it considers the legal, regulatory, and contractual requirements for the information you share with Blackline.

BLACKLINE SAFETY CLOUD

Blackline develops IoT cloud software (Blackline Cloud) and services that monitor employee safety across various locations. The Blackline Cloud includes:

- Software
- Networking
- Provisioning
- Data storage
- Customer accounts with access controls
- Blackline Live portal
- Device service subscription management
- Reporting

We use modern cloud-based infrastructure technologies to build, maintain and innovate new software features for our connected safety devices. The Blackline Cloud is a fully independent software platform that does not require data access to any external client data sources or services.

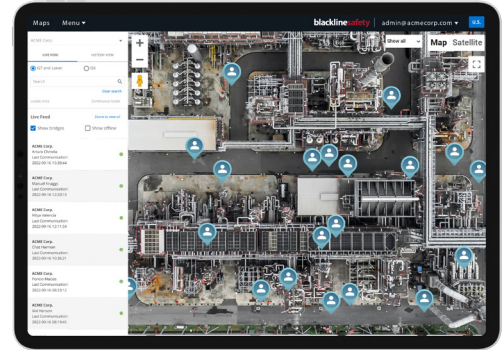
The Blackline Cloud is hosted by Amazon Web Services (AWS), a leading cloud hosting service provider to global brands like 3M, BP, Adobe, Canon, GE, Alcatel Lucent, BMW, Hitachi, NASA and many others.

BLACKLINE LIVE

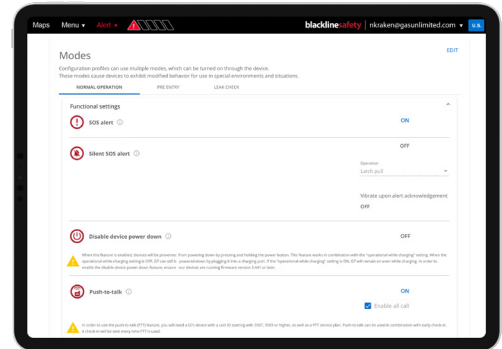
As part of the Blackline Cloud, Blackline Live is our web-based user portal that supports:

- IoT safety device assignment
- Device configuration management
- Alert configuration
- Alert lifecycle management
- Data analytics

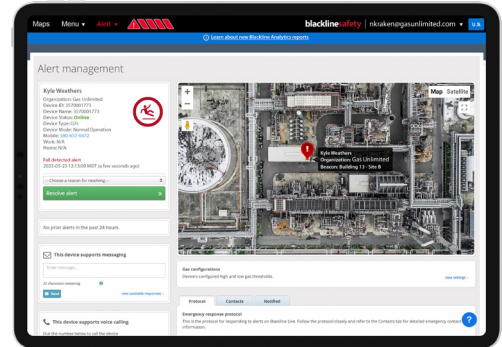
The portal also supports role-based access controls to ensure personnel only have access to approved information and device grouping capability with corresponding access controls, plus the ability to link together multiple Blackline Live organization-level accounts.



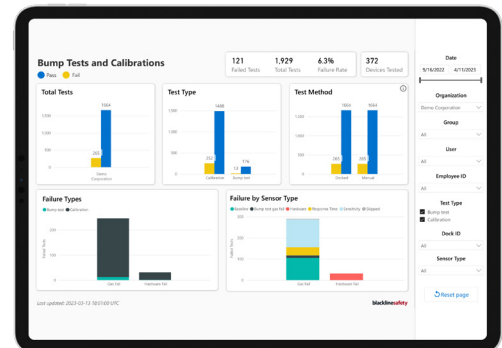
Blackline Live Map



Blackline Live Configurations



Blackline Live Alert Management



Blackline Analytics - Bump Tests and Calibration

BLACKLINE CLOUD ARCHITECTURE

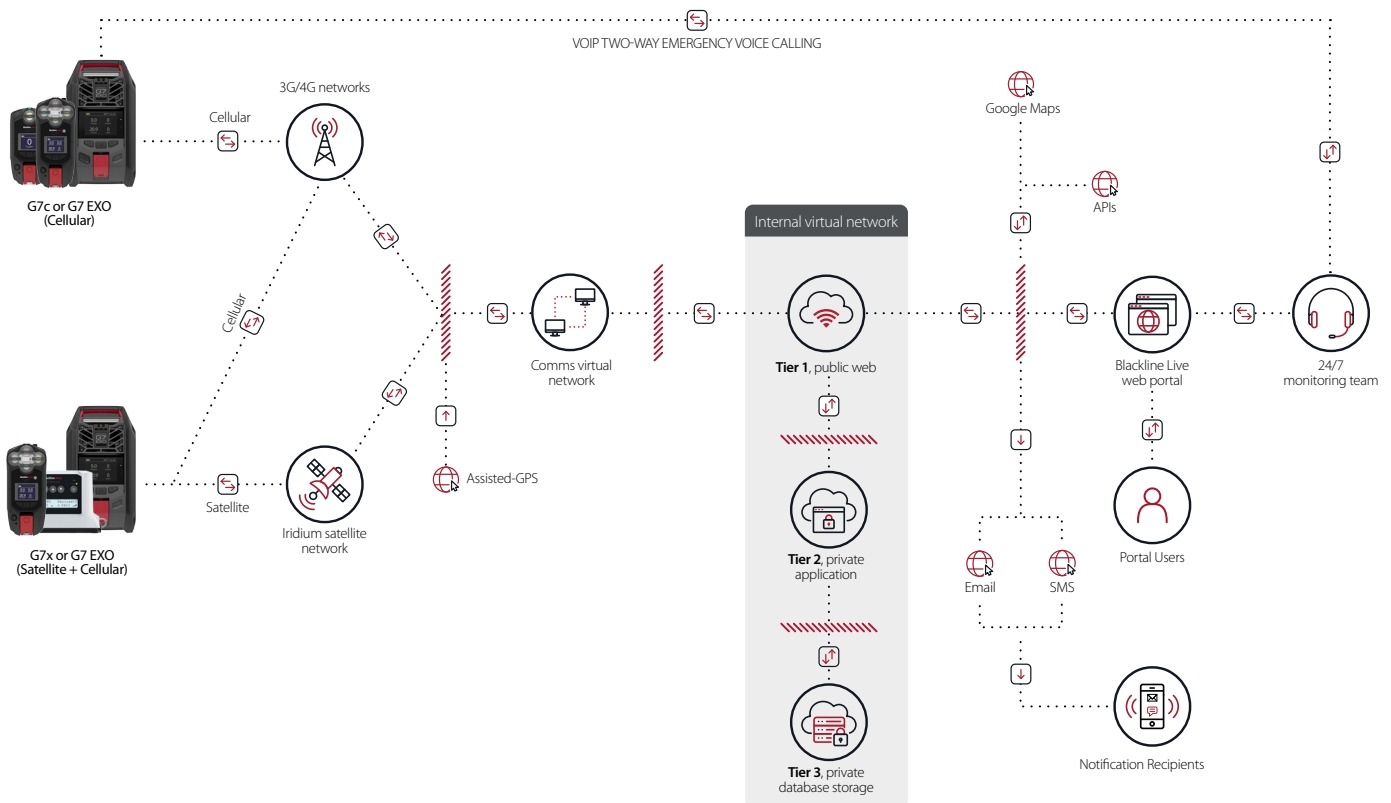
Blackline's safety IoT devices communicate directly with the Blackline Cloud using cellular (2G, 3G, 4G, NB-IoT, and LTE-M) and optional satellite connectivity. Our IoT devices do not require connection into traditional customer IT networks, such as Wi-Fi. Cellular services are offered in most countries and territories globally, while satellite communications are limited to North America, some Central and South American countries, Australia, New Zealand, and South Africa.

Our Blackline Live portal is the primary interface for safety IoT device configuration, alert setup, emergency response management and reporting, with domains hosted in North America, Europe, and the United Arab Emirates. We also provide

software APIs for real-time alert delivery and IoT safety device data and events.

The Blackline ecosystem is made up of connected safety devices, communications networks, cloud-hosted infrastructure, and user interfaces. Blackline can optionally provide 24/7 live monitoring services delivered by dedicated personnel.

Within the Blackline Cloud, we have established separate virtual networks to manage device traffic, communications networking, internal network, core application, and data storage. Each of these layers is individually firewalled to ensure security and control throughout the complete architecture.



LEGEND | FIREWALLS: [diagonal lines] | WEB SERVICES: [globe icon] | DATA FLOW: [arrow icon]

BUSINESS-CRITICAL SERVICE AVAILABILITY

Each customer must assess the criticality of Blackline's services to its business. As a safety monitoring system, Blackline recommends a comprehensive internal review and assessment, including how to manage continuity of safety monitoring in the event that device communications or Blackline Cloud services are temporarily unavailable. A client's operations, legal, and compliance teams are likely the best resources equipped to support this assessment.

PERSONAL INFORMATION

Blackline safeguards client data with comprehensive policies and procedures designed to protect this information. Please refer to our [Privacy Policy](#) for more details.

Our services include access to our Blackline Live portal, wireless connectivity, cloud-based data storage, Blackline Analytics reporting, email/text notifications, and options that include alert management, two-way emergency voice calling, push-to-talk, and software APIs. Some services require password-protected Blackline Live user account access.

Under our services, we may collect, store, and process confidential information, including employee personally identifiable information (PII). To eliminate the sharing of PII with Blackline, customers can deploy Blackline IoT devices to their employees anonymously, and create user accounts using anonymized email addresses for Blackline Live access.

In all circumstances, clients operate as data controllers while Blackline acts as the processor. Overall customer information, including PII, may include:

- Organization name and address
- Employee names, roles, employee IDs, phone numbers, locations, addresses, and emails (PII)
- Employee personal contacts with names, phone numbers and relationship types (PII)
- Documented emergency response protocols
- Location Beacon names, locations, and addresses
- Site and/or floor plan layers and zones/geofences
- Assignment of devices to employee contact cards stored within the address book (PII)
- Alert profiles that define alert logic based upon device settings, plus notification subscribers from the employee address book (PII)
- Alert management history with employee name, timestamps, locations, notations (PII)

- Emergency voice calls recorded through Blackline's Twilio service vendor (PII)
- Safety Operations Center recorded voice calls from our global contact center partner and stored in Azure (PII)
- Two-way messages between device users and the monitoring team (PII)

To provide customers with information and services, Blackline may use this information to:

- Fulfill a contract with our customers, including verification of employee identities as required to process payments, provide implementation services and support users.
- Monitor how our websites and online services are used to help us improve and protect our products, content, services, and websites.
- Respond to any customer comments or complaints about our website, products, or services.
- Provide our customers with information about new products, product and service updates, newsletters, informative emails, and research on future product ideas or improvements, as well as to personalize our communication to our customers.
- Invite our customers to take part in market research or surveys.

Information collected through our marketing website, www.blacklinesafety.com, and entered into Blackline Live is collected and managed according to our [Privacy Policy](#). All confidential information and PII provided by our clients is never shared with third parties beyond our sub-processors that assist in delivering our services to clients.

For data retention and anonymization details following a customer's contracted service term, see Trust Pillars, section **2. Privacy**.

LEGAL, REGULATORY, AND CONTRACTUAL REQUIREMENTS

Determining the legal, regulatory, or contractual constraints for your PII and other information processed by the Blackline Cloud is your responsibility in collaboration with your legal and compliance teams. If you have users located in the European Economic Area (EEA) or the United Arab Emirates (UAE), the General Data Protection Regulation (GDPR) and Personal Data Protection Law (PDPL) privacy requirements may apply to PII shared with Blackline.

Do not use Blackline Live to store or process data such as personal health information (PHI), payment or financial data. The Blackline Cloud is not HIPAA or PCI-DSS compliant.

TRUST PILLARS

Securing trust with our customers is supported by four pillars: information security, compliance, privacy, and reliability.

1. Information security

INFORMATION SECURITY MANAGEMENT

Blackline has developed an Information Security Management System (ISMS) to ensure a comprehensive commitment to information security. The ISMS framework includes controls aligned with the Trust Services Principles and Criteria for Security and Availability, essential for maintaining Blackline's Service Organization Controls (SOC 2) Type 2 audit report.

CORPORATE AND OPERATIONAL SECURITY

Production infrastructure access: Access to the production infrastructure requires authentication through a cryptographic authentication key over an AWS Systems Manager Agent (SSM Agent). It also mandates that the authentication requests originate from a known set of IP addresses, and that all user accounts require a unique identifier.

Production access control: Our Software and Data teams have role-based access to our production cloud systems and data. This access is approved, controlled, and reviewed regularly to ensure security and compliance.

Access reviews: In addition to automated controls, periodic access reviews are conducted on in-scope systems to limit administrative access to production systems based on approved roles and responsibilities.

Training and awareness: All Blackline employees receive security and privacy awareness training during onboarding, as well as regular ongoing refreshers. Training covers topics including information security, phishing awareness and prevention, password policy, security incident management, office physical security, confidentiality requirements and data privacy.

Corrective and preventive action: Blackline takes action to control and correct nonconformities or suspected control breakdowns through root cause investigations, implementing preventative measures and assigning the necessary resources within the timelines as required.

Change management procedures: To comply with SOC 2 requirements, Blackline has established formal change management processes to control the design, development, testing, and implementation of fixes and improvements to the Blackline Cloud, Blackline Live portal, and Blackline Analytics. These processes mitigate the risk of unauthorized changes to production systems and address the production infrastructure and software development lifecycle. They include change requests, approvals, and standard change implementation procedures for commonly applied changes.

Blackline Safety employees: Employees must sign an acknowledgment form confirming access to and review of the Employee Handbook, along with an understanding of the responsibility to comply with its security policies. Additionally, employees are required to sign a confidentiality and non-disclosure agreement (NDA) that prohibits the disclosure of proprietary or confidential information, including customer information, to unauthorized parties. Background checks, including criminal, education, and references are conducted as part of the hiring process.

PRODUCT SECURITY

Infrastructure: The Blackline Cloud is hosted and managed on Amazon Web Services (AWS) across multiple availability zones to support fault tolerance, high availability, and disaster recovery. A secondary hosting provider is used to store encrypted backups to mitigate the risk of a single infrastructure provider failure that could result in customer data loss. Our Blackline Analytics offering uses Microsoft Azure and Power BI for reporting and data visualization.

Software development lifecycle: Before implementing changes in the production environment, Blackline software developers perform source code reviews along with security, functional, and performance testing for major application changes. Development and testing activities are conducted in separate test environments to eliminate the risk of production impact.

Encryption: To protect customers' confidential data, Blackline encrypts data in the Blackline Cloud, which hosts our Blackline Live portal and Blackline Analytics. Customer data is securely transferred to the Blackline Live portal using Transport Layer Security (TLS v1.2) and is encrypted at rest using a minimum of AES256 encryption.

Key management: Blackline uses AWS Key Management Service (KMS) for encrypting our customer data. KMS is designed to prevent unauthorized access to master keys, ensuring the security of data stored within the Blackline Cloud.

Multi-tenancy: Blackline's platform is designed to host multiple customers, providing consistent access and standardized processes. Logistical separation of customer data is achieved through a Role Based Access Control (RBAC) system. Access to data is restricted based on customer identifiers, and each record in the Blackline Cloud includes a unique customer identifier. User sessions are linked to customer identifiers, ensuring customer-specific data retrieval.

Admin-enabled access controls : The Blackline Cloud features a robust grouping structure in its permissions system. Customers can efficiently manage content access for specific users through Blackline Live groups. These groups function as containers, allowing customers to create a device grouping framework that aligns with their organization or site-based structure. Leveraging the RBAC system, customers have precise control over user access to designated groups, ensuring a tailored and secure content management experience.

Authentication: Blackline supports single sign-on (SSO) via SAML 2.0 compliant Identity Providers (IdPs), enabling integration with any IdP that uses SAML. Additionally, Blackline supports form-based authentication SSO for Blackline Live delivers a confident and secure authentication system that leverages the customer's multi-factor authentication (MFA) system.

Product security testing: For internal testing, Blackline performs Static Application Security Testing (SAST) and Dynamic Application Security Testing (DAST) to detect security vulnerabilities, including all vulnerabilities outlined in the OWASP top-10. Additionally, specialized external third-party service firms are contracted for annual penetration tests to detect malicious code and other vulnerabilities. Results are reviewed by engineering and security staff who develop remediation plans for identified vulnerabilities.

2. Privacy

POLICY

Blackline maintains and publishes its [Privacy Policy](https://www.blacklinesafety.com/privacy-policy) online at www.blacklinesafety.com, informing clients about its privacy practices that support customer objectives. Any changes to Blackline's privacy practices, including changes in the use of PII, are included in the policy to align with client privacy objectives.

CONSENT, COLLECTION AND PROCESSING

Blackline communicates the choices available to customers regarding the collection, use, retention, disclosure, and disposal of their personal information. We obtain explicit consent from customers for these activities, ensuring alignment with their privacy objectives and using the information only for its intended

purpose. Blackline collects PII in accordance with its Privacy Policy, obtaining explicit consent prior to collection to meet privacy objectives.

The use of personal information is limited to the purposes specified in the privacy objectives.

DATA RETENTION

Following the completion of a service term, Blackline retains data for the earlier of : 1) a customer's request to delete their data, or 2) a maximum of three years. Data deletion is managed through anonymization of all customer data. As described below, prior to anonymization of data, customers can request an export of their data in an accessible, non-proprietary format.

The Blackline Live portal stores 200 days of data for customers. Data flows from Blackline Live to Blackline Analytics in near real-time, enabling customers to leverage advanced historical reporting and visualization. Customers can request a shorter Blackline Live retention time if desired.

To support rigorous customer reporting requirements (including compliance), Blackline Analytics stores all customer data until the completion of the service term. Like Blackline Live, our Blackline Analytics service also supports the option for a shorter customer-requested data retention period.

System-wide encrypted backups are maintained for a revolving 30-day period in compliance with GDPR, with a maximum retention of 60 days before deletion.

USA, EUROPE AND UAE DATA RESIDENCY

Blackline offers three data residency options through three separate Blackline Cloud domains, including in the USA, Europe, and UAE. This provides customers with the option of selecting their preferred domain for storage and processing of data, including their PII.

Blackline works with our customers to ensure that all data resides in the appropriate region for their organization, including their operating entities may function across more than one domain. Customers based in the United States and Canada are provisioned in our US domain. Organizations based in Europe and the United Kingdom are provisioned in our Europe domain. Clients based in the UAE are provisioned in our UAE domain. Clients located outside these regions may choose the region for their Blackline Cloud deployment.

DATA PORTABILITY

At any time during the service term and prior to data anonymization, customers can request an export of a portion or all of their data. Customers should direct their data export request to Blackline's Technical Support team at support@blacklinesafety.com. Blackline will provide a quote for the encrypted export.

DATA BACKUPS

Blackline uses a secondary hosting provider to store encrypted backups, mitigating the risk of a single infrastructure provider failure that could result in customer data loss.

THIRD-PARTY VENDOR DATA ACCESS

Blackline only discloses client PII to contracted sub-processors for the purpose of delivering services to our customers. A data-processing agreement is in place for such vendors. This includes the sending of SMS and email notifications and alerts that may include employee names, phone numbers, physical addresses and email addresses, geographic locations, and environmental data. This also includes the hosting of the Blackline Cloud and associated information, including PII stored in AWS and processed in Azure.

UNAUTHORIZED PRIVACY DISCLOSURES

Blackline creates and retains a complete, accurate, and timely record of detected or reported unauthorized disclosures (including breaches) of personal information to meet the customer's objectives related to privacy.

3. Compliance

Blackline's hosting providers, AWS and Microsoft Azure, undergo annual audits against widely recognized standards and frameworks such as SOC 1, SOC 2, and ISO 27001.

While many software-as-a-service (SaaS) companies solely rely on their hosting providers' security and compliance certifications, Blackline views information security as a shared responsibility.

We hold ourselves to the highest industry standard for security assurance and undergo an annual SOC 2 Type 2 audit. This provides customers with an independent third-party assurance that our security controls are designed and operating effectively.

PRIVACY REGULATIONS

To support our customers in Europe, the United Kingdom, and the United Arab Emirates in achieving their privacy compliance goals, Blackline established dedicated Blackline Cloud domains for Blackline Live and Blackline Analytics in the UK, EU, and UAE.

4. Reliability

Blackline is committed to providing high quality, reliable service, having designed the Blackline Cloud to leverage multiple datacenters and high availability.

MULTIPLE DATA CENTERS

Blackline's North American infrastructure is hosted and managed on AWS across multiple availability zones and regions for certain functions. This structure supports fault tolerance, high availability, and disaster recovery. Our primary site is in northern Virginia, USA, with a secondary site in Oregon, USA.

BUSINESS CONTINUITY AND DISASTER RECOVERY

Blackline maintains Business Continuity and Disaster Recovery plans to meet business and availability requirements. Blackline's Service Level Agreement (SLA) documents our availability commitments and maintenance policy.