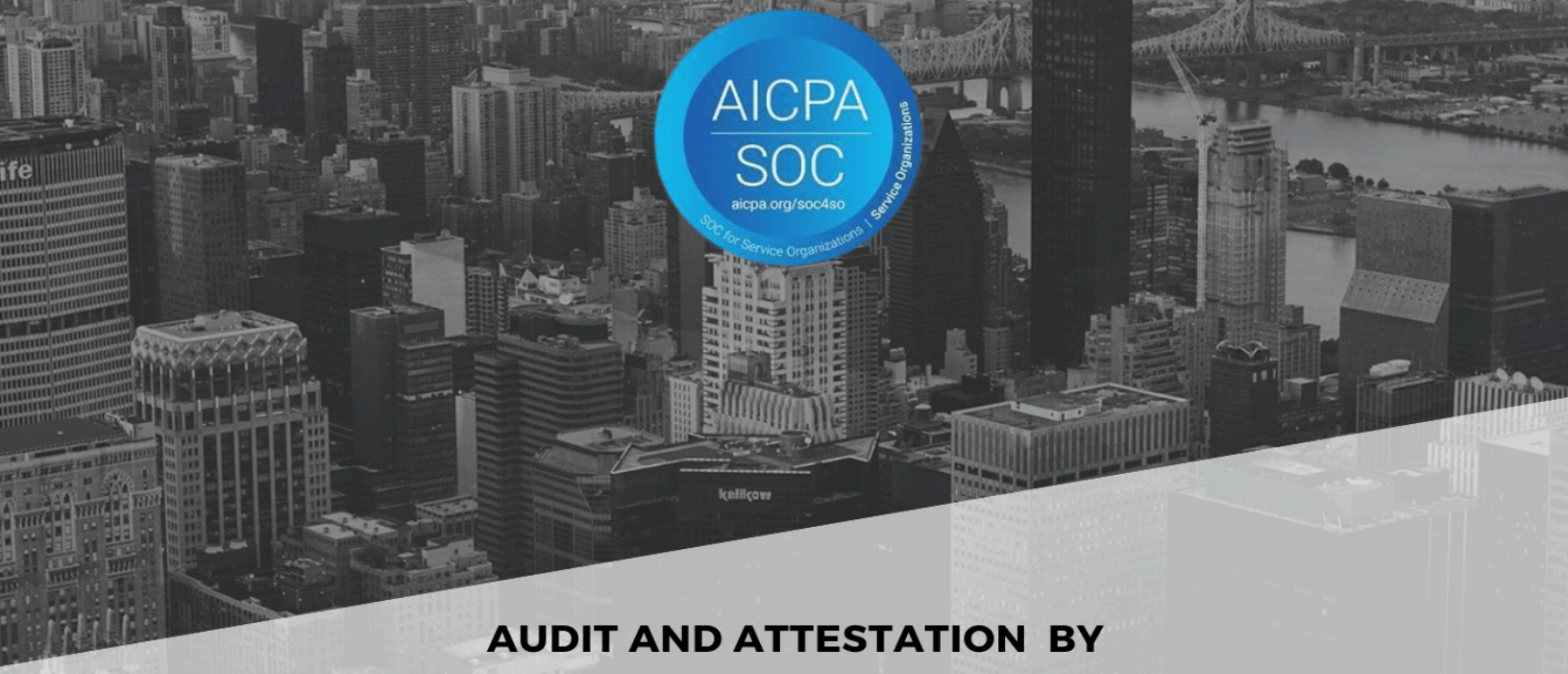
boostlingo

SOC 3 Report

Boostlingo

November 1, 2023 to November 1, 2024

An Independent Service Auditor's Report on Controls Relevant to Security, Confidentiality and Availability



AUDIT AND ATTESTATION BY

PRESCIENT ASSURANCE

CPA™

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SECTION 1

Management's Assertion



Management's Assertion

We are responsible for designing, implementing, operating, and maintaining effective controls within Boostlingo's On-Demand and Boostlingo IMS Platform system (the system) throughout the period November 1, 2023, to November 1, 2024, to provide reasonable assurance that Boostlingo's service commitments and system requirements relevant to Security, Confidentiality and Availability were achieved. Our description of the boundaries of the system is presented in Attachment A and identifies the aspects of the system covered by our assertion.

We have performed an evaluation of the effectiveness of controls within the system throughout the period November 1, 2023, to November 1, 2024, to provide reasonable assurance that Boostlingo's service commitments and system requirements were achieved based on the trust services criteria relevant to Security, Confidentiality and Availability (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). Boostlingo'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 Attachment A.

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 November 1, 2023, to November 1, 2024, to provide reasonable assurance that Boostlingo's service commitments and system requirements were achieved based on the applicable trust services criteria.

DocuSigned by:
Bryan Forrester
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Bryan Forrester
CEO
Boostlingo

SECTION 2

Independent Service Auditor's Report



Independent Service Auditor's Report

To: Boostlingo

Scope

We have examined Boostlingo's accompanying assertion in Section I, titled "Management's Assertion" (the assertion) that the controls within Boostlingo's On-Demand and Boostlingo IMS Platform system (the system) were effective throughout the period November 1, 2023, to November 1, 2024, to provide reasonable assurance that Boostlingo's service commitments and system requirements were achieved based on the trust services criteria relevant to Security, Confidentiality and Availability (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).

Service Organization's Responsibilities

Boostlingo 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 Boostlingo's service commitments and system requirements were achieved. In Section I, Boostlingo has provided the accompanying assertion about the effectiveness of the controls within the system. When preparing its assertion, Boostlingo is responsible for selecting, and identifying in its assertion, the applicable trust services 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 AICPA. 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 the following:

- Obtaining an understanding of the system and the service organization's service commitments and system requirements
- Assessing the risks that the controls are not effective to achieve Boostlingo'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 Boostlingo'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 risks 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 Boostlingo's On-Demand and Boostlingo IMS Platform system were effective throughout the period November 1, 2023, to November 1, 2024, to provide reasonable assurance that Boostlingo's service commitments and system requirements were achieved based on the applicable trust services criteria is fairly stated, in all material respects.

This report is not intended to be, and should not be, used by anyone other than these specified parties.

DocuSigned by:
Prescient Assurance
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Prescient Assurance LLC
February 11, 2025

SECTION 3

Attachment A



Company Overview and Types of Products and Services Provided

Boostlingo is a technology company headquartered in Austin, TX, with offices in San Francisco, Copenhagen, and Dublin. Our mission is to build innovative technology that empowers our customers and the people they serve to communicate without barriers and increase language access for all.

Description of services overview or services provided

Boostlingo simplifies language services with its all-in-one platform. From scheduling on-site, remote, and on-demand interpreters to event interpreting, AI-powered captioning, and translation services, Boostlingo provides a complete solution.

Boostlingo On-Demand allows customers to manage and deliver interpretation services through phone and video. The system description in this report section details the Boostlingo On-Demand Platform. Any other Boostlingo services are not within the scope of this report.

Boostlingo On-Demand Platform focuses on phone and video interpreting delivery and management. Customers can add staff interpreters or access the Boostlingo Hub for on-demand and pre-scheduled calls to 17,000 interpreters in 300+ languages. Intelligent routing, custom IVR, and call settings can be used for specialized call routing. In addition, customers can use detailed reporting for internal management and leverage built-in integrations.

Boostlingo IMS automates the day-to-day coordination and management of interpretation services. The platform allows for remote and on-site services to be scheduled and managed from one place.

The Principal Service Commitments and System Requirements

Boostlingo designs its processes and procedures related to the system to meet its objectives. Those objectives are based on the service commitments that Boostlingo makes to user entities, the laws, and regulations that govern the provision of the services, and the financial, operational, and compliance requirements that Boostlingo has established for the services. The system services are subject to the Security, Confidentiality, and Availability commitments established internally for its services.

Boostlingo's commitments to users are communicated through Service Level Agreements (SLAs), Cloud Service Agreements (CSA), Master Agreements (MA), and online Privacy Policy.

Security Commitments

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

- System features and configuration settings designed to authorize user access while restricting unauthorized users from accessing information not needed for their role
- Use of intrusion detection systems to prevent and identify potential security attacks from users outside the boundaries of the system
- Regular vulnerability scans over the system and network, and penetration tests over the production environment
- Operational procedures for managing security incidents and breaches, including notification procedures
- Use of encryption technologies to protect customer data both at rest and in transit
- Use of data retention and data disposal
- Up time availability of production systems

Confidentiality Commitments

Confidentiality commitments include, but are not limited to, the following:

- The use of encryption technologies to protect system data both at rest and in transit
- Confidentiality and non-disclosure agreements with employees, contractors, and third parties
- Confidential information must be used only for the purposes explicitly stated in agreements between Boostlingo and user entities

Availability Commitments

Availability commitments include, but are not limited to, the following:

- System performance and availability monitoring mechanisms to help ensure the consistent delivery of the system and its components
- Responding to customer requests in a reasonably timely manner
- Operational procedures supporting the achievement of availability commitments to user entities

The Components of the System Used to Provide the Services

People

Boostlingo employs dedicated team members to handle major product functions, including operations, and support. The IT/Engineering Team monitors the environment, as well as manages data backups and recovery. Boostlingo focuses on hiring the right people for the right job as well as training them both on their specific tasks and on the ways to keep the company and its data secure.

Boostlingo has a staff of approximately 160 organized in the following functional areas:

Management: Individuals who are responsible for enabling other employees to perform their jobs effectively and for maintaining security and compliance across the environment.
This includes:

- CEO - Bryan Forrester
- CFO - Scott Parnell
- CTO - Matt Cotton
- CRO - Merrie Wallace
- CPO - Nina Siglin
- VP of Product - Brian D'Agostino
- VP of Language Access - Caroline Remer

Operations: Responsible for maintaining the availability of production infrastructure, and managing access and security for production infrastructure. Only members of the Operations team have access to the production environment. Members of the Operations team may also be members of the Engineering team.

Information Technology: Responsible for managing laptops, software, and other technology involved in employee productivity and business operations.

Product Development: Responsible for the development, testing, deployment, and maintenance of the source code for the system. Responsible for the product life cycle, including adding additional product functionality.

Processes and procedures

Management has developed and communicated policies and procedures to manage the information security of the system. Changes to these procedures are performed annually and authorized by management, the executive team, control owners, and Legal. These procedures cover the following key security life cycle areas:

- Physical Security
- Logical Access
- Availability
- Change Control
- Data Communications
- Risk Assessment
- Data Retention
- Vendor Management

Logical access

Boostlingo provides employees and contracts access to infrastructure via a role-based access control system, to ensure uniform, least privilege access to identified users and to maintain simple and repeatable user provisioning and deprovisioning processes.

Access to these systems is split into admin roles, user roles, and no access roles. User access and roles are reviewed on an annual basis to ensure least privilege access.

IT is responsible for provisioning access to the system based on the employee's role and performing a background check. The employee is responsible for reviewing Boostlingo's policies, completing security training. These steps must be completed within thirty (30) days of hire.

When an employee is terminated, IT is responsible for deprovisioning access to all in scope systems within 24 hours of that employee's termination.

Computer operations - backups

Customer data is backed up and monitored by the DevOps Team for completion and exceptions. If there is an exception, DevOps Team will perform troubleshooting to identify the root cause and either rerun the backup or as part of the next scheduled backup job.

Backup infrastructure is maintained in AWS with physical access restricted according to the policies. Backups are encrypted, with access restricted to key personnel.

Computer operations - availability

Boostlingo maintains an incident response plan to guide employees on reporting and responding to any information security or data privacy events or incidents. Procedures are in place for identifying, reporting and acting upon breaches or other incidents.

Boostlingo internally monitors all applications, including the web UI, databases, and cloud storage to ensure that service delivery matches SLA requirements.

Boostlingo utilizes vulnerability scanning software that checks source code for common security issues as well as for vulnerabilities identified in open source dependencies and maintains an internal SLA for responding to those issues.

Change management

Boostlingo maintains documented Systems Development Life Cycle (SDLC) policies and procedures to guide personnel in documenting and implementing application and infrastructure changes. Change control procedures include change request and initiation processes, documentation requirements, development practices, quality assurance testing requirements, and required approval procedures.

A ticketing system is utilized to document the change control procedures for changes in the application

and implementation of new changes. Quality assurance testing and User Acceptance Testing (UAT) results are documented and maintained with the associated change request. Development and testing are performed in an environment that is logically separated from the production environment. Management approves changes prior to migration to the production environment and documents those approvals within the ticketing system.

Version control software is utilized to maintain source code versions and migrate source code through the development process to the production environment. The version control software maintains a history of code changes to support rollback capabilities and tracks changes to developers.

Boundaries of the system

The boundaries of the Boostlingo On-Demand & IMS Platform are the specific aspects of the Company's infrastructure, software, people, procedures, and data necessary to provide its services and that directly support the services provided to customers. Any infrastructure, software, people, procedures, and data that indirectly support the services provided to customers are not included within the boundaries of the Boostlingo On-Demand & IMS Platform.

This report does not include the Cloud Hosting Services provided by AWS at multiple facilities.

The Applicable Trust Services Criteria and the Related Controls Designed to Provide Reasonable Assurance that the Service Organization's Service Commitments and System Requirements were Achieved

Integrity and ethical values

The effectiveness of controls cannot rise above the integrity and ethical values of the people who create, administer, and monitor them. Integrity and ethical values are essential elements of Boostlingo's control environment, affecting the design, administration, and monitoring of other components. Integrity and ethical behavior are the product of Boostlingo's ethical and behavioral standards, how they are communicated, and how they are reinforced in practices. They include management's actions to remove or reduce incentives and temptations that might prompt personnel to engage in dishonest, illegal, or unethical acts. They also include the communication of entity values and behavioral standards to personnel through policy statements and codes of conduct, as well as by example.

Specific control activities that the service organization has implemented in this area are described below:

- Formally, documented organizational policy statements and codes of conduct communicate entity values and behavioral standards to personnel.
- Policies and procedures require employees sign an acknowledgment form indicating they have been given access to the employee handbook (and associated policies) and understand their responsibility for adhering to the policies and procedures contained within the handbook.
- A confidentiality statement agreeing not to disclose proprietary or confidential information, including client information, to unauthorized parties is a component of the employee handbook.
- Background checks are performed for employees as a component of the hiring process.

Commitment to competence

Boostlingo's management defines competence as the knowledge and skills necessary to accomplish tasks that define employees' roles and responsibilities. Management's commitment to competence includes management's consideration of the competence levels for jobs and how those levels translate into the requisite skills and knowledge.

Specific control activities that the service organization has implemented in this area are described below:

- Management has considered the competence levels for particular jobs and translated required skills and knowledge levels into written position requirements.
- Training is provided to maintain the skill level of personnel in certain positions.

Management's philosophy and operating style

The Boostlingo management team must balance two competing interests: continuing to grow and develop in a cutting edge, rapidly changing technology space while remaining excellent and conservative stewards of the highly-sensitive data and workflows our customers entrust to us.

The management team meets frequently to be briefed on technology changes that impact the way Boostlingo can help customers build data workflows, as well as new security technologies that can help protect those workflows, and finally any regulatory changes that may require Boostlingo to alter its software to maintain legal compliance. Major planned changes to the business are also reviewed by the management team to ensure they can be conducted in a way that is compatible with our core product offerings and duties to new and existing customers.

Specific control activities that the service organization has implemented in this area are described below:

- Management is periodically briefed on regulatory and industry changes affecting the services provided.
- Executive management and senior leadership meetings are held to discuss major initiatives and issues that affect the business.

Organizational structure and assignment of authority and responsibility

Boostlingo'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.

Boostlingo's assignment of authority and responsibility activities include factors such as how authority and responsibility for operating activities are assigned and how reporting relationships and authorization hierarchies are established. It also includes policies relating to appropriate business practices, knowledge, and experience of key personnel, and resources provided for carrying out duties. In addition, it includes policies and communications directed at ensuring personnel understand the entity's objectives, know how their individual actions interrelate and contribute to those objectives, and recognize how and for what they will be held accountable.

Specific control activities that the service organization has implemented in this area are described below:

- Organizational charts are in place to communicate key areas of authority and responsibility.
- Organizational charts are communicated to employees and updated as needed.

HR policies and practices

Boostlingo's success is founded on sound business ethics, reinforced with a high level of efficiency, integrity, and ethical standards. The result of this success is evidenced by its proven track record for hiring and retaining top quality personnel who ensures the service organization is operating at maximum efficiency. Boostlingo's human resources policies and practices relate to employee hiring, orientation, training, evaluation, counseling, promotion, compensation, and disciplinary activities.

Specific control activities that the service organization has implemented in this area are described below:

- New employees are required to sign acknowledgment forms for the employee handbook and a confidentiality agreement following new hire orientation on their first day of employment.
- Performance evaluations for each employee are conducted on an annual basis.
- Personnel termination procedures are in place to guide the termination/offboarding process and are documented in an offboarding checklist.

Risk assessment process

Boostlingo's risk assessment process identifies and manages risks that could potentially affect Boostlingo's ability to provide reliable and secure services to our customers. As part of this process, Boostlingo maintains a risk register to track all systems and procedures that could present risks to meeting the company's objectives. Risks are evaluated by likelihood and impact, and management creates tasks to address risks that score highly on both dimensions. The risk register is reevaluated annually, and tasks are incorporated into the regular Boostlingo product development process so they can be dealt with predictably and iteratively.

Complementary Subservice Organization Controls (CSOCs)

Boostlingo'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 Boostlingo's services to be solely achieved by Boostlingo control procedures. Accordingly, subservice organizations, in conjunction with the services, should establish their own internal controls or procedures to complement those of Boostlingo.

The following subservice organization controls have been implemented by AWS and included in this report to provide additional assurance that the trust services criteria are met.

AWS

Category	Criteria	Control
Security	CC 6.4	Physical access to data centers is approved by an authorized individual.
Security	CC 6.4	Physical access is revoked within 24 hours of the employee or vendor record being deactivated.
Security	CC 6.4	Physical access to data centers is reviewed on a quarterly basis by appropriate personnel.
Security	CC 6.4	Closed circuit television camera (CCTV) are used to monitor server locations in data centers. Images are retained for 90 days, unless limited by legal or contractual obligations.
Security	CC 6.4	Access to server locations is managed by electronic access control devices.
Security	CC 7.2	AWS is responsible for the installation of fire suppression and detection, and environmental monitoring systems at the data centers.
Security	CC 7.2	AWS is responsible for protecting data centers against disruption in power supply to the processing environment by an uninterruptible power supply.
Security	CC 7.2	AWS is responsible for overseeing the regular maintenance of environmental protections at data centers.
Availability	A 1.2	AWS maintains formal policies that provide guidance for information security within the organization and the supporting IT environment.

Category	Criteria	Control
Availability	A 1.2	AWS has a process in place to review environmental and geo-political risks before launching a new region.
Availability	A 1.2	Amazon-owned data centers are protected by fire detection and suppression systems.
Availability	A 1.2	Amazon-owned data centers are air conditioned to maintain appropriate atmospheric conditions. Personnel and systems monitor and control air temperature and humidity at appropriate levels.
Availability	A 1.2	Uninterruptible Power Supply (UPS) units provide backup power in the event of an electrical failure in Amazon owned data centers
Availability	A 1.2	Amazon-owned data centers have generators to provide backup power in case of electrical failure.
Availability	A 1.2	Contracts are in place with third-party colocation service providers which include provisions to provide fire suppression systems, air conditioning to maintain appropriate atmospheric conditions, Uninterruptible Power Supply (UPS) units, and redundant power supplies. Contracts also include provisions requiring communication of incidents or events that impact Amazon assets and/or customers to AWS.

Boostlingo management, along with the subservice provider, 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, Boostlingo performs monitoring of the subservice organization controls, including the following procedures:

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

Any Specific Criterion of the Applicable Trust Services Criteria That is Not Relevant to the System and the Reasons it is Not Relevant

All Common Criteria/Security, Security, Confidentiality, and Availability criteria were applicable to the Boostlingo's On-Demand & IMS Platform system.

Disclosure of Significant Changes in Last 1 Year

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