



Delivering Quality, Assuring Trust.

System and Organization Controls (SOC) 3
Report on Instruqt B.V. 's Instruqt Platform Relevant to Security
Throughout the Period September 1, 2024, to November 30, 2024



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INDEPENDENT SERVICE AUDITOR'S REPORT

INDEPENDENT SERVICE AUDITOR'S REPORT ON A SOC 3 EXAMINATION

To: Instruqt B.V.

Scope

We have examined Instruqt B.V.'s ("Instruqt") accompanying assertion titled "Instruqt B.V.'s Management Assertion" (assertion) that the controls within the Instruqt Platform (system) were effective throughout the period September 1, 2024, to November 30, 2024, to provide reasonable assurance that Instruqt' service commitments and system requirements were achieved based on the trust services criteria relevant to Security (applicable trust services criteria) set forth in TSP section 100, *2017 Trust Services Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy (With Revised Points of Focus – 2022)* in AICPA, *Trust Services Criteria*.

Service Organization's Responsibilities

Instruqt 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 Instruqt' service commitments and system requirements were achieved. Instruqt has also provided the accompanying assertion about the effectiveness of controls within the system. When preparing its assertion, Instruqt 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 Auditor's Responsibilities

Our responsibility is to express an opinion, based on our examination, on 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.

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

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 Instruqt B.V.'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 Instruqt B.V.'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.

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 the Instruqt Platform were effective throughout the period September 1, 2024, to November 30, 2024, to provide reasonable assurance that Instruqt B.V.'s service commitments and system requirements were achieved based on the applicable trust services criteria is fairly stated, in all material respects.

Insight Assurance LLC

Tampa, Florida
February 6, 2025

INSTRUQT B.V.'S MANAGEMENT ASSERTION



INSTRUQT B.V.'S MANAGEMENT ASSERTION

We are responsible for designing, implementing, operating, and maintaining effective controls within Instruqt B.V.'s ("Instruqt") Instruqt Platform throughout the period September 1, 2024, to November 30, 2024, to provide reasonable assurance that Instruqt' service commitments and system requirements were achieved based on the trust services criteria relevant to Security (applicable trust services criteria) set forth in TSP section 100, *2017 Trust Services Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy (With Revised Points of Focus – 2022)*, in AICPA *Trust Services Criteria*. 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 the controls within the system throughout the period September 1, 2024, to November 30, 2024, to provide reasonable assurance that Instruqt' service commitments and system requirements were achieved based on the applicable trust services criteria. Instruqt' 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 B.

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 September 1, 2024, to November 30, 2024, to provide reasonable assurance that Instruqt' service commitments and system requirements were achieved based on the applicable trust services criteria.

Instruqt B.V.
February 6, 2025

ATTACHMENT A DESCRIPTION OF THE BOUNDARIES OF THE INSTRUQT PLATFORM

ATTACHMENT A

INSTRUQT B.V.'S DESCRIPTION OF THE BOUNDARIES OF ITS INSTRUQT PLATFORM

SERVICES PROVIDED

The Instruqt Platform provides customers with a product adoption suite. The system description in this section of the report details the Instruqt Platform.

Instruqt's core product, the Instruqt Platform (the "system") is a Software as a Service (SaaS) solution that allows customers to create hands-on interactive training labs. Using these labs, Instruqt's customers can offer the following activities to their employees, customers and prospects:

- Create interactive, hands-on demos and product tours
- Deliver hands-on workshops
- Facilitate onboarding of new employees and customers
- Provide hands-on learning capabilities to third-party systems and platforms, like learning management systems and documentation portals.

INFRASTRUCTURE

Instruqt maintains a system inventory that includes virtual machines (compute instances), computers (desktops and laptops), and networking devices (switches and routers). The inventory documents device name, device type, vendor function, OS, location, and notes. Instruqt utilizes GCP as a subservice organization to host Instruqt's processing system. Instruqt leverages the experience and resources of GCP to enable Instruqt to achieve its service commitments and system requirements. GCP is responsible for designing and configuring the Instruqt processing system architecture within GCP to help ensure service commitments and system requirements are met. The in-scope infrastructure components are shown in the table below:

Primary Infrastructure		
Asset	Type	Purpose
Instruqt Backend	Backend application	Provisions, monitors and controls cloud infrastructure that is used to render Instruqt's services
Instruqt Web Platform	Web application and backend applications	Used by end users to access the services provided by Instruqt. Includes administration screens, reports and insights for Instruqt's customers.

Instruqt is responsible for managing the development and operation of the system. The software supporting the system consists of the applications, programs, and other software components used to build, secure, maintain, and monitor the system. The list of software is shown in the table below:

Third Party Software	
Software	Function
GitHub	Version control
ArgoCD	Continuous Deployments
Temporal	Open-source component for scheduling processes

PEOPLE

The company employs dedicated team members to handle major product functions, including operations that directly support the system. The responsibilities of each group are detailed in the following table. Instruqt's corporate structure includes the following roles:

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

Chief Executive Officer (CEO) – Handles the strategic direction of the organization. The CEO assigns authority and responsibility to key management personnel with the skills and experience necessary to carry out their assignments.

Chief Finance Officer – Steers the financial matters, budgets and financial targets of the organization. CFO signs off on any substantial spending or cost saving decisions.

Chief Technology Officer – Strategic partner and member of the management team. Ensures long term strategy and day to day execution are aligned, and product and engineering functions deliver according to planned roadmap.

Technology and Engineering – Technology, including product and engineering capacity, plans the upcoming capabilities that will be added or improved to render Instruqt services.

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.

DATA

Customer data is managed, processed, and stored in accordance with the relevant data protection and other regulations, with specific requirements formally established in customer agreements. Customer data is captured which is utilized by Instruqt in delivering its managed IT Services and Cybersecurity Solutions Services.

All employees and contractors of the company are obligated to respect and, in all cases, to protect customer data. Additionally, Instruqt has policies and procedures in place for proper and secure handling of customer data. These policies and procedures are reviewed on at least an annual basis.

Data is classified into four major categories as outlined in the Data Management Policy:

Data		
Category	Description	Examples
Public	Public information is not confidential and can be made public without any implications.	<ul style="list-style-type: none"> • Press releases • Public website
Internal	Access to internal information is approved by management and is protected from external access.	<ul style="list-style-type: none"> • Internal memos • Design documents • Product specifications • Correspondences
Customer data	Information received from customers for processing or storage. The company must uphold the highest possible levels of integrity, confidentiality, and restricted availability for this information.	<ul style="list-style-type: none"> • Customer operating data • Customer PII • Customers' customers' PII • Anything subject to a confidentiality agreement with a customer
Company data	Information collected and used by the company to operate the business. The company must uphold the highest possible levels of integrity, confidentiality, and restricted availability for this information.	<ul style="list-style-type: none"> • Legal documents • Contractual agreements • Employee PII • Employee salaries

PROCEDURES

Management has developed and communicated policies and procedures involved in the operation of the system. These procedures are developed in alignment with the overall information security policy and are reviewed, updated, and approved as necessary for changes in the business at least annually.

**ATTACHMENT B
PRINCIPAL SERVICE
COMMITMENTS AND
SYSTEM REQUIREMENTS**

ATTACHMENT B

PRINCIPAL SERVICE COMMITMENTS AND SYSTEM REQUIREMENTS

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

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.