Verification of Declaration of Adherence

Declaring Company: ServiceNow Inc.

**EU
CLOUD
COC**

Verification-ID	2022LVL02SCOPE3113
Date of Approval	July 2023
Valid until	July 2024

Table of Contents

1 Verification against v2.11 of the EU Cloud CoC

This Declaration of Adherence was against the *European Data Protection Code of Conduct for Cloud Service Providers* (**'EU Cloud CoC'**)[1] in its version 2.11 (**'v2.11'**)[2] as of December 2020.

Originally drafted by the Cloud Select Industry Group[3] (**'C-SIG'**) the EU Cloud CoC – at that time called C-SIG Code of Conduct on data protection for Cloud Service Providers – was developed against Directive 95/46/EC[4] and incorporated feedback by the European Commission as well as Working Party 29. Following an extensive revision of earlier versions of Code and further developing the substance of the Code (v2.11) and its provisions has been aligned to the European General Data Protection Regulation (**'GDPR'**)[5].

2 List of declared services

2.1 IT Service Management (ITSM)

- Incident Management
- Problem Management
- Change Management
- Now Mobile
- Mobile Agent
- Configuration Management Database (CMDB)
- Benchmarks
- Virtual Agent
- Digital Portfolio Management
- DevOps
- Predictive Intelligence
- Performance Analytics
- Vendor Management Workspace
- Workforce Optimization
- Process Optimization
- Employee Centre

2.2 IT Operation Management (ITOM) (STANDARD, PROFESSIONAL, AIOps ENTERPRISE)

- Discovery
- Service Mapping
- Certificate Management
- Firewall Audit
- Service Graph Connectors
- Configuration Management Database
- Agent Client Collector
- Event Management
- Metric Intelligence
- Site Reliability Operations
- Health Log Analytics
- Governance

2.3 HR Service Delivery (HRSD)

- Case and Knowledge Management
- Now Mobile

---

[1] https://eucoc.cloud
[2] https://eucoc.cloud/get-the-code
[3] https://ec.europa.eu/digital-single-market/en/cloud-select-industry-group-code-conduct
[4] https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:31995L0046
[5] https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679

- HR Agent Workspace
- Employee Relations
- Employee centre
- Performance Analytics
- Virtual Agent
- Predictive Intelligence
- Employee Journey Management

- Enterprise Onboarding and Transitions
- Alumni Service canter
- Employee Document Management
- Process Optimization
- Workforce Optimization
- Universal Request
- Issue Auto Resolution

2.4 Workplace Service Delivery (PRO, ENTERPRISE)

- App Engine Custom Tables
- Health and Safety
- Workplace Case Management
- Workplace Reservation Management
- Workplace Visitor Management
- Workplace Indoor Mapping
- Virtual Agent
- Performance Analytics
- Predictive Intelligence

- Universal Request Pro
- Mobile Publishing
- Workplace Space Management
- Workplace Move Management
- Workplace Maintenance Management
- Workplace Lease Administration
- Workplace Central

2.5 Customer Service Management (CSM)

- Agent Workspace
- Case Management
- Omnichannel
- Self-Service
- Virtual Agent
- Advanced Work Assignment
- Service Management for Issus Resolution
- Engagement Messenger

- Guided Decisions
- Predictive Intelligence
- Workforce Optimization
- Process Optimization
- Knowledge Management
- Task Intelligence
- Field Service Management
- Customer Project Management

2.6 Field Service Management (STANDARD, PROFESSIONAL)

- Dynamic Scheduling
- Mobile Agent
- Planned Maintenance
- Asset Management
- Cost Management
- Field Service Contractor Management
- Dispatcher Workspace
- Field Service Crew Operations
- Capacity and Reservations Management

- Continual Improvement Management
- Predictive Intelligence
- Virtual Agent
- Performance Analytics
- Field Service Multi-Day Task Scheduling
- Inventory Management
- Schedule Optimization
- Field Service Territory Planning

2.7 App Engine (App Engine Starter, App Engine)

- UI Builder
- Automated Test Framework
- Delegated Development
- Flow Designer
- Service Creator
- Service Portal
- Studio IDE
- Guided App Creator
- Now Mobile
- Mobile Studio

- Agent Workspace
- Process Automation Designer
- App Engine Management Centre
- App Engine Studio
- Prebuilt Templates
- Performance Analytics
- Predictive Intelligence
- Virtual Agent
- unlimited apps

2.8 Automation Engine (Integration Hub Starter, Automation Engine Professional, Automation Engine Enterprise)

- Integration Hub Enterprise, Integration Hub Professional
- Custom REST integrations
- RPA Hub
- Attended Robots

- Unattended Robots
- Document Intelligence
- Orchestration
- Automation canter

2.9 Strategic Portfolio Management (SPM) (STANDARD, PROFESSIONAL)

- Project Portfolio Management
- Resource Management
- Release Management
- Digital Portfolio Management
- Innovation Management
- Strategic Planning
- Agile Development
- Scaled Agile Framework (Safes)

- Investment Funding
- Predictive Intelligence
- Virtual Agent
- Performance Analytics
- Demand Management
- Scenario Planning
- Mobile Applications

2.10 IT Asset Management (ITAM)

- Hardware Asset Management
- Software Asset Management
- Cloud Insights

- IT Asset Offboarding
- SaaS License Management
- Enterprise Asset Management

2.11 ServiceNow Vault

- Platform Encryption
- Data Anonymization
- Secrets Management

- Log Export Service
- Code Signing

2.12 Security Operations (SecOps)

- Security Incident Response
- Vulnerability Response
- Configuration Compliance
- Threat Intelligence

- Performance Analytics for Security Operations
- Event Management
- DLP Incident Response

2.13 Governance Risk and Complaince (GRC) (IRM STANDARD, IRM PROFESSIONAL, IRM ENTERPRISE)

- Policy and Compliance Management
- Risk Management
- Performance Analytics
- Audit Management
- Use Case Accelerators
- Virtual Agent (chatbot)
- Predictive Intelligence
- Continuous Authorization and Monitoring
- Regulatory Change
- Operational Resilience
- Operational Risk Management

2.14 Telecomunications Service Operations Management

- Event Management
- Operational Intelligence
- TM Forum Open APIs

2.15 Operational Technology Management

- OT Foundation
- OT Visibility
- OT Vulnerability Response
- OT Service Management

2.16 Legal Service Delivery

- Legal Request management
- Legal Counsel Centre
- Legal Matter Management
- Legal Practice Applications
- Legal Knowledge Management
- Employee Centre
- Now Mobile
- Mobile Agent
- Virtual Agent
- Reporting
- Legal Investigations

2.17 Procurement Service Management

- Procurement Case Management
- ShoppingHub
- New Mobile
- Employee Center
- Knowledge Management
- Reporting

2.18 Financial Services Management

- Personal and Commercial Lines Servicing for Insurance
- Deposit Operations for Banking
- Financial Services Data Model
- Financial Services Card Operations
- Financial Services Payment Operations
- Financial services Loan Operations
- Performance Analytics
- Financial Services Document Management
- Agent Workspace
- Case and Knowledge Management
- Omni-channel
- Advanced Work Assignment
- Predictive Intelligence
- Self-Service
- Virtual Agent
- Knowledge Management
- Communities

- Visual Task Asignment
- Customer Central
- Playbooks for Customer Service
- Guided Decisions
- Visual Workflow and Automation
- Mobile Agent

- Walk-up Experience
- Proactive Customer Service Operations
- Problem Management
- Customer Project Management

2.19 Telecomunications Service Management

- Service Bridge
- Telecommunications Assurance Workflows
- Order Management for Telecommunications
- Agent Workspace
- Case Management
- Omni-channel
- Customer Central
- Advanced Work Assignments
- Playbooks for Customer Service
- Guided Decisions
- Predictive Intelligence
- Self-Service
- Virtual Agent

- Knowledge Management
- Communities
- Flow Designer
- Proactive Customer Service Operations
- Problem Management
- Visual Task Boards
- Mobile Agent
- Perforamnce Analytics
- Reporting
- Surveys and Assessments
- Continual Improvement Management
- TM Forums APIs
- Catalog Versioning
- Horizontal Catalog Dependencies

2.20 Order Management

- Products Bundles and Attributes
- Product Detail Pages
- Self-Service
- Agent Order Capture

- Product Catalog
- Order Capture API
- Price Lists

2.21 Order Management for Technology Providers

- Product Catalog and Data Model
- Product and Service Agnostic

- Order Capture API
- Dynamic Orchestration Plans

2.22 Order Management for Telecommunications

- Order Management for Telecommunications
- Fallout Management
- In-Flight Order Changes
- Attribute Propagation

- TM Forums API
- Order Capture
- Staggered Decomposition
- Process Optimization

2.23 Technology Provider Service Management

- Omni- Channel
- Integrated Self-Service

- Virtual Agent
- Predictive Intelligence

- Service Bridge
- Technology Service Workflows
- Playbooks for Customer Service
- Proactive Customer Service Operations
- Proactive Customer Engagement
- Guided Decisions
- Advanced Work Assignment

- Service-Aware CMDB
- Agent Workspace
- Customer Central
- Reports and Dashboards
- Case and Knowledge Management
- Performance Analytics
- Workforce Optimization

2.24 Healthcare and Life Sciences service management

- Vaccine Administration Management
- Pre-Visit Management
- Patient Support Services
- Patient 360
- Digital Documentation
- Consent Management
- Agent Workspace
- Omni-Channel
- Self-Service
- Virtual Agent

- Knowledge Management
- Communities
- Playbook for Customer Service
- Guided Decisions
- Predictive Intelligence
- Performance Analytics
- Case Management
- Visual Task Boards
- Surveys and Assessments

2.25 Public Sector Digital Services

- Public Sector Data Model
- Government Services Portal
- Agent Workspace
- Engagement Messenger
- Virtual Agent
- Predictive Intelligence
- Performance Analytics
- Playbooks for Customer Service

- Guided Decisions
- Walk-Up Experience
- Request Management
- Omni-Channel
- Customer Central
- Advanced Work Assignment
- Self-Service

2.26 Manufacturing connected Workforce

- App Engine Studio
- Now Mobile
- Agent Workspace

- Visual Task Boards
- Flow Designer

2.27 Enterprise Asset Management (EAM)

- Enterprise Asset Life Cycle Management
- Enterprise Asset Estate
- Multi-Component Assets
- Risk Scoring
- Enterprise Asset Inventory Management
- Mobile Asset Receiving
- Asset Inventory Audits

- Asset Refresh Planning
- Enterprise Asset Catalog
- Asset Reservations
- Recalls
- Lease-End Management
- Enterprise Asset Maintenance
- Enterprise Asset Work Management
- Asset Reclamation

2.28 ServiceNow Platform Encryption

- Cloud Encryption
- Column Level Encryption Enterprise

2.29 Supplier Lifecycle management

- Knowledge Management
- Performance Analytics
- Procurement Case Management
- Vendor Risk Management
- Now Mobile

2.30 Telecommunications Network Inventory

- Network Inventory Data Model
- Equipment Models and Template
- Design and Assign
- VLAN and LAG Number Management
- Cable and Fibre Strand Management
- Network Inventory Configurable Workspace

2.31 Health and Safety

- Employee Center
- Health and Safety Incident Management
- Workplace Case Management
- Contract Tracing
- Safe Workplace Dashboard
- Vaccination Status
- Employee Travel Safety
- Employee Health Screening
- Health and Safety Testing
- Workplace PPE Inventory Management
- Employee Readiness Survey

2.32 IntegrationHub Starter, IntegrationHub Professional and IntegrationHub Enterprise[6]

Subject to the Code is the connectivity feature, i.e., the integration subject to appropriate technical and organisational measures. Not in scope of this declaration of adherence is any of the services that might be integrated by the Customer respectively the processing activities of such services. The listing in this report shall only reflect the capabilities at the time of assessment.

2.32.1 STARTER

Spokes

---

[6] **Provided by the CSP:** Definitions: A Spoke is a predefined action, flow, and/or integration for connecting or automating third party systems or processes within Flow Designer. A Protocol is the communication format of mechanism used when interacting with a third-party system. A Utility is a common, reusable, solution to facilitate integration development.
*Each package includes entitlement to all spokes, protocols, and utilities in lower tier packages.
** Remote Instance Spoke Transactions are not counted against Transaction entitlement.

- AI Search
- Cisco WebEx Teams
- Cisco WebEx Meetings
- Continuous Integration and Continuous Delivery (CICD) Spoke
- Google Hangouts
- Goto
- Looker
- Microsoft Teams
- Microsoft Teams Graph API
- Microsoft Teams Communications
- Miro
- PagerDuty
- Plivo
- Rally
- Roadmunk
- ServiceNow Remote Instance (formerly eBonding)
- Slack
- Slack WebHooks

2.32.2 PROFESSIONAL

Spokes
- Agent Client Collector
- Ansible
- Docker
- F5 BIG-IP
- GitHub
- GitLab
- Gremlin
- Infoblox
- Jenkins
- Jenkins V2
- JIRA
- Kubernetes
- Twitter
- Microsoft Azure Artifacts
- Azure DevOps Boards
- Aha!
- Amazon Alexa
- Amazon Elastic Container Service
- Azure Automation
- BMC Remedy
- Box
- Calendly
- Confluence Cloud
- Dropbox Business
- Google Calendar
- Google Directory

- Smartrecruiters
- Utility Actions
- Vonage
- Workfront
- Workplace from Facebook
- Zoom
- Twilio

Protocols
- REST
- SOAP

Utilities
- Zip

Features
- Payload Builder step
- Retry policies
- Remote Tables

- Google Docs
- Google Drive
- Google Cloud DNS
- Gmail
- Google Sheets
- Google Tasks
- Go Notify
- Microsoft AD
- Microsoft AD v2
- Microsoft Azure AD
- Microsoft Azure Application Insights
- Microsoft Azure Resource Management
- Microsoft Exchange Online
- Microsoft Exchange Server
- Microsoft 365 Excel
- Microsoft Intune
- Microsoft OneDrive
- Microsoft OneDrive Document Services
- Microsoft SharePoint
- Monday.com
- Okta
- Oracle Autonomous DB
- Oracle Block Storage
- Oracle Boot Volume
- Oracle Cloud IAM

- Oracle Compute Engine
- Oracle Object Storage Management
- Oracle Virtual Cloud Network
- Qualtrics
- SABA
- Secureworks CTP
- Shodan
- Smartsheet
- Survey Monkey
- Trello
- Wrike
- Lucidchart
- OneLogin

Apps

- Orchestration

Protocols

- Powershell
- SSH
- JDBC

Features

- JSON Parser
- XML Parser

2.32.3 ENTERPRISE

- Adobe Experience Platform
- Adobe Sign
- Amazon Connect
- Amazon CloudWatch
- Amazon DynamoDB
- Amazon EC2
- AWS Elastic BeanStalk
- Amazon EBS
- AWS IAM
- Amazon RDS
- Amazon Route53
- Amazon S3
- Amazon SNS
- Amazon VPC
- Automation Anywhere
- AWS Certificate Manager
- AWS CloudFormation
- AWS Elastic Load Balancing
- AWS Lambda
- AWS OpsWorks
- Azure Blob Storage
- Azure Traffic Manager
- BigFix Inventory
- Blue Prism
- Confluent Kafka REST Proxy
- Cornerstone
- Coupa
- Crowdstrike
- DocuSign
- First Advantage
- Google Identity and Access
- Google Cloud Datastore
- Google Cloud Functions
- Google Cloud Load Balancer

- Google Cloud Pub Sub
- Google Cloud SQL
- Google Cloud Storage
- Google Cloud Virtual Network
- Google Cloud VPC Access
- Google Compute Engine
- Google Persistent Disk
- Jamf
- Jira Service Management
- Microsoft 365
- Microsoft Azure Cosmos DB
- Microsoft Azure Managed Storage
- Microsoft Azure SQL Database
- Microsoft Azure Notification Hub
- Microsoft Azure Virtual Machines
- Microsoft Azure Virtual Network
- Microsoft Dynamics CRM
- Microsoft Endpoint Configuration Manager
- Microsoft Dynamics 365 for Finance and Operations
- Microsoft SCCM Usage Metering
- Microsoft Security Response Center
- Oracle EBS spoke
- Oracle Financial Cloud spoke
- Oracle HCM Cloud
- Oracle Peoplesoft Financial
- Pluralsight
- Salesforce
- Salesforce Marketing Cloud
- SAP Ariba
- SAP Concur
- SAP Commerce Cloud

- SAP ECC IDoc
- SAP ECC RFC
- SAP Fieldglass
- SAP S4 HANA IDOC
- SAP S4 HANA RFC
- ServiceNow Kafka Consumer
- SuccessFactors
- SumTotal
- Udemy
- UIPath
- UKG
- UCF
- Workday Financials
- Workday HR
- YouTube
- Zendesk
- Asana
- CFPB
- FIS
- JHA
- Navex EthicsPoint
- Redox Electronic Health Record Spoke
- Socure

Apps

- Access Management Automation

Automation

- Flow Templates for Access management
- Flow Templates for Notifications
- Flow Templates for Documents Management
- Flow Templates for IntegrationHub Enterprise
- Flow templates for HR Management
- Flow templates for Cloud services
- Remote Process Synch
- Password Reset integration with Okta
- Password Reset integration with Google Directory
- Client software Distribution
- Client Software Distribution 2.0
- Password Reset Integration with AD
- Password Reset Integration with Azure AD
- ServiceNow Kafka Consumer
- Virtual Agent for Citrix ITSM Connector
- Flow Templates for Service Desk v1

Features

- Data Stream actions
- Introspection (dynamic inputs and dynamic outputs
- REST API trigger

3   Verification Process - Background

V2.11 of the EU Cloud CoC has been developed against GDPR and hence provides mechanisms as required by Articles 40 and 41 GDPR[7].

3.1   Approval of the Code and Accreditation of the Monitoring Body

The services concerned passed the verification process by the Monitoring Body of the EU Cloud CoC, i.e., SCOPE Europe sprl/bvba[8].

---

[7] https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679
[8] https://scope-europe.eu

The Code has been officially approved in May 2021[9]. SCOPE Europe has been officially accredited as Monitoring Body in May 2021[10]. The robust and complex procedures and mechanisms can be reviewed by any third-party in detail at the website of the EU Cloud CoC alongside a short summary thereof.[11]

3.2   Principles of the Verification Process

Notwithstanding the powers of and requirements set out by the supervisory authority pursuant to Article 41 GDPR, the Monitoring Body will assess whether a Cloud Service, that has been declared adherent to the Code, is compliant with the requirements of the Code - especially as laid down in the Controls Catalogue. Unless otherwise provided by the Code, the Monitoring Body's assessment process will be based on an evidence-based conformity assessment, based on interviews and document reviews; proactively performed by the Monitoring Body.

To the extent the Monitoring Body is not satisfied with the evidence provided by a CSP with regards to the Cloud Service to be declared adherent to the Code, the Monitoring Body will request additional information. Where the information provided by the CSP appears to be inconsistent or false, the Monitoring Body will - as necessary - request substantiation by independent reports.

3.3   Multiple Safeguards of Compliance

Compliance of adherent services is safeguarded by the interaction of several mechanisms, i.e., continuous, rigorous, and independent monitoring, an independent complaints' handling process, and finally any CSP declaring services adherent is subject to substantial remedies and penalties in case of any infringement.

3.4   Process in Detail

It is expected that, prior to any assessment of the Monitoring Body, each CSP assesses its compliance internally. When declaring its service(s) adherent to the EU Cloud CoC, each CSP must elaborate its compliance with each of the Controls as provided by the Code considering the Control Guidance, as provided by the Controls Catalogue, to the Monitoring Body.

The CSP may do so either by referencing existing third-party audits or certifications, their respective reports and by free text responses. Additionally, the CSP will have to provide a general overview of the

---

[9] https://www.gegevensbeschermingsautoriteit.be/publications/decision-n05-2021-of-20-may-2021.pdf
[10] https://www.gegevensbeschermingsautoriteit.be/publications/decision-n-06-2021-of-20-may-2021.pdf
[11] https://eucoc.cloud/en/public-register/assessment-procedure/

functionalities, technical, organisational and contractual frameworks of the service(s) declared adherent.

With regards to internationally recognised standards, the Monitoring Body will consider the mapping as provided by the Controls Catalogue. However, the Monitoring Body will verify whether (a) any third-party certification or audit provided by the CSP applies to the Cloud Service concerned, (b) such third-party certification or audit provided by the CSP is valid, (c) such third-party certification or audit has assessed and sufficiently reported compliance with the mapped controls of the third-party certification or audit concerned. Provided that the aforementioned criteria are met, the Monitoring Body may consider such third-party certifications or audits as sufficient evidence for the compliance with the Code.

Within Initial Assessments, the Monitoring Body selects an appropriate share of Controls that will undergo in-depth scrutiny, e.g., by sample-taking and requesting further, detailed information including potentially confidential information. Within any other Recurring Assessment, the Monitoring Body will select an appropriate share of Controls provided that over a due period every Control will be subject to scrutiny by the Monitoring Body. Where applicable, aspects of current attention at the time of assessment shall be covered too, e.g., where such aspects were indicated in media reports, publications or actions of supervisory authorities.

If the responses of the CSP satisfy the Monitoring Body, especially if responses are consistent and of appropriate quality and level of detail, reflecting the requirements of the Controls and indicating appropriate implementation by the Control Guidance, then, the Monitoring Body verifies the service(s) declared adhered as compliant and thereupon, makes them subject to continuous monitoring.

3.4.1 Levels of Compliance

V2.11 of the Code provides three different levels of Compliance. The different levels of compliance relate only to the levels of evidence that are submitted to the Monitoring Body. There is, however, no difference in terms of which parts of the Code are covered, since adherent Cloud Services have to comply with all provisions of the Code and their respective Controls.

3.4.1.1 First Level of Compliance

The CSP has performed an internal review and documented its implemented measures proving compliance with the requirements of the Code with regard to the declared Cloud Service and confirms that the Cloud Service fully complies with the requirements set out in this Code and further specified in the Controls Catalogue. The Monitoring Body verifies that the Cloud Service complies with the Code by information originating from the CSP.

3.4.1.2 Second Level of Compliance

Additional to the "First Level of Compliance", Compliance with the Code is partially supported by independent third-party certificates and audits, which the CSP has undergone with specific relevance to the Cloud Service declared adherent and which were based upon internationally recognised standards procedures. Any such third-party certificates and audits that covered controls similar to this Code, but not less protective, are considered in the verification process of the Monitoring Body. Each third-party certificates and audits that were considered in the verification process by the Monitoring Body shall be referred in the Monitoring Body's report of verification, provided that the findings of such certificates were sufficiently and convincingly reported and documented towards the Monitoring Body and only to the extent such certificates and audits are in line with the Code. The CSP must notify the Monitoring Body if there are any changes to the provided certificates or audits.

The Controls Catalogue may give guidance on third-party certificates and audits that are equivalent to certain Controls in terms of providing evidence of complying with the Code.

However, to those Controls that the CSP has not provided any equivalent third-party certificate or audit, the Monitoring Body verifies that the Cloud Service complies with the Code by information originating from the CSP.

The Monitoring Body may refuse application of Second Level of Compliance if third-party certificates and audit reports, that are recognised by the Monitoring Body in the verification process concerned, are not covering an adequate share of Controls of this Code; such adequate share shall be subject to the discretion of the Monitoring Body, considering e.g., the share related to the overall amount of Controls of the Code or whether a full Section or topic is being covered.

3.4.1.3 Third Level of Compliance

Identical to the "Second Level of Compliance" but Compliance is fully supported by independent third-party certificates and audits, which the CSP has undergone with regard to the Cloud Service declared adherent and which were based upon internationally recognised standards.

To the extent a CSP refers to individual reports, such as ISAE-3000 reports, the CSP shall ensure that such reports provide sufficient and assessable information and details on the actual measures implemented by the CSP regarding the Cloud Service concerned. The Monitoring Body shall, if considered necessary, in consultation with the Steering Board, define further requirements on such individual reports, such as accreditation and training for auditors against the provisions and requirements of this Code.

3.4.2 Final decision on the applicable Level of Compliance

When declaring its Cloud Service adherent, the CSP indicates the Level of Compliance it is seeking to achieve. Any final decision, whether a CSP is meeting the requirements of a specific Level of Compliance is at the sole discretion of the Monitoring Body.

3.5 Transparency about adherence

Each service adherent to the EU Cloud CoC must transparently communicate its adherence by both using the appropriate Compliance Mark[12] and referring to the Public Register of the EU Cloud CoC[13] to enable Customers to verify the validity of adherence.

4 Assessment of declared services by ServiceNow (see 2.)

4.1 Fact Finding

Following the declaration of adherence of ServiceNow Inc. ('**ServiceNow**'), the Monitoring Body provided ServiceNow with a template, requesting ServiceNow to detail its compliance with each of the Controls of the EU Cloud CoC.

As this declaration is a renewal[14], the Monitoring Body requested from ServiceNow a confirmation that there has been no material change to the applicable technical and organisational and contractual framework. The Monitoring Body also requested from ServiceNow a comparison of the declared Cloud Services of last year and this year as well as to explicitly indicate any Cloud Services that are no longer included in the Declaration of Adherence and, where applicable, provide the Monitoring Body with adequate reasons. To the extent the list of Cloud Services was extended, the Monitoring Body requested a confirmation, that any such additional Cloud Services are subject to the same technical, organisational and contractual framework as the original Cloud Services.

ServiceNow promptly responded to the templates. Information provided consisted of references and list of actual measures meeting the requirements of each Control, a free text answer describing their measures, and a reference to third party audits and certifications, where applicable. This information

---

[12] https://eucoc.cloud/en/public-register/levels-of-compliance/
[13] https://eucoc.cloud/en/public-register/
[14] You can access the Verification Report(s) of previous year(s) via the following link(s): ServiceNow Verification Report (2022)

was completed by the two confirmations requested by the Monitoring Body as well as a detailed comparison of the declared Cloud Services between last year and this year verification highlighting the changes and the reasons for them.

4.2   Selection of Controls for in-depth assessment

Following the provisions of the Code and the Assessment Procedure applicable to the EU Cloud CoC[15], the Monitoring Body analysed the responses and information provided by ServiceNow.

ServiceNow's declared services have been externally certified and audited. ServiceNow holds an ISO 27001 certificate, which is valid for the duration of the Declaration of Adherence, and the scope of registration includes all the declared services. The declaration of adherence referred to the respective 27001 ISO certification within the responses to Section 6 of the Code (IT Security). As provided by the Code, the Monitoring Body may consider third-party certifications and audits. Accordingly, the Monitoring Body verified the certification and references. Further in-depth checks were not performed, as provided third-party certifications adequately indicated compliance.

4.3   Examined Controls and related findings by the Monitoring Body

4.3.1   Examined Controls

The Monitoring Body reviewed the submission from ServiceNow which outlined how all the requirements of the Code were met by ServiceNow's implemented measures. In line with the Monitoring Body's process outlined in Section 3.4, the Monitoring Body selected a subset of Controls from the Code for in-depth scrutiny. In-depth scrutiny reflects sample taking and follow-up questions, whilst the latter may address requests for clarifications or more detailed information. The Controls selected for this level of review were: 5.1.A, 5.1.E, 5.2.D, 5.2.E, 5.2.F, 5.2.G, 5.3.D, 5.3.G, 5.4.C, 5.4.E, 5.5.E, 5.5.F, 5.6.A, 5.7.B, 5.8.B, 5.12.A, 5.12.B, 5.12.C, 5.12.D, 5.12.F, 5.13.A, 6.1.C.

4.3.2   Findings by the Monitoring Body

During the process of verification, ServiceNow consistently prepared the Declaration of Adherence well and thoroughly. ServiceNow's responses were detailed and never created any impression of intentional non-transparency. Requests for clarification, additional and supporting information, as well as relevant samples were promptly dealt with and always met the deadlines set by the Monitoring Body.

---

[15] https://eucoc.cloud/en/about/about-eu-cloud-coc/applicable-procedures/

Related to the Monitoring Body's requests (see section 4.1), ServiceNow indicated that no relevant changes to the Cloud Service Family were applied in regards of the implemented technical, organisational and contractual framework. Where additional Cloud Services were added, ServiceNow provided explicit confirmation that such Cloud Services belong to the same Cloud Service Family.

The Monitoring Body did not focus on Section 6, as a current and applicable ISO certification was provided. The Monitoring Body may rely on such external reports and certifications, if those meet the criteria as set out in the Code, which is indicated where such international audit or certification is already being mapped within the Control's Catalogue. Referenced audits and certifications are those international standards, that have been appropriately mapped to Section 6, so that the Monitoring Body has strong indications allowing the Monitoring Body to rely on those. The Monitoring Body analysed the certifications and assessed whether the scope of applicability covered all Controls as provided by the Code. Upon request ServiceNow confirmed that all Cloud Services being declared in this declaration of adherence are covered by the respective certificates.

One area of focus was ServiceNow's assistance provided to the Customers. Customers are provided with the relevant GDPR compliance information by means of Community Portal and Product Resource centre, and CORE platform where Customer may receive additional confidential compliance information under non-disclosure agreement. Additionally, ServiceNow makes available to the Customers two channels to provide additional assistance, Customers may reach out to Customer support and or a dedicated Privacy team. Moreover, based on the ServiceNow shared responsibility approach Customers are provided with self-service capabilities to retrieve and export data in standard structured formats. Customers are provided with product information and instructions via CORE platform.

In line with the self-service capabilities offered by ServiceNow, Customers are enabled to autonomously respond to the data subject requests and have access to the relevant information to respond to requests by supervisory authorities. ServiceNow have internal procedures in place to assist the Customer to facilitate compliance with its obligations under Data Protection Laws.

Third country transfers has also been in the scope of the assessment of the Monitoring Body. ServiceNow has implemented safeguards as provided by Chapter V GDPR, as it relies on the Standard Contractual Clauses (SCCs), as published by the European Commission, by including them as an attachment to the Data Processing Addendum. ServiceNow has indicated that it constantly monitors regional legislative changes and Supervisory Authority publications for insights to the current state of regional Data Privacy requirements.

Another area of the assessment has been ServiceNow's confidentiality obligations with employees and contractors. ServiceNow has provided information that contractors, full time or part time employees and interns are subject to appropriate confidentiality obligations prior to engaging in the Customer Personal Data processing activities. The obligation to maintain confidentiality remains in effect after the end of the employment and/or contractual agreement. The ServiceNow employees undergo data protection training and development programs on an annual basis, alongside with the mandatory policy reviews. Such training and development program are developed against the role and job function, and being reviewed on the annual basis.

ServiceNow ensures that Customer personal data is processed in line with the Customer instructions, set up in the Data Processing Addendum, including the possibility for additional instructions, in case it is agreed in writing between the Customer and ServiceNow. Additionally, ServiceNow maintains data protection policy to ensure that customer personal data is not being processed by personnel for any purpose unless specifically instructed by the Customer. In this vein, ServiceNow personnel, based on the ability to process such a data, may be subject to additional training modules and specific controls.

5 Conclusion

The information provided by ServiceNow were consistent. Where necessary, ServiceNow gave additional information or clarified their given information appropriately.

The Monitoring Body therefore verifies the services as compliant with the EU Cloud CoC based on the performed assessment as prescribed in 1. The service(s) will be listed in the Public Register of the EU Cloud CoC[16] alongside this report.

In accordance with sections 3.4.1.2 and 3.4.2 and given the type of information provided by Service-Now to support the compliance of its service, the Monitoring Body grants ServiceNow with a Second Level of Compliance.

---

[16] https://eucoc.cloud/en/public-register/

6 Validity

This verification is valid for one year. The full report consists of 21 pages in total, whereof this is the last page closing with the Verification-ID. Please refer to the table of contents at the top of this report to verify that the copy you are reading is complete, if you have not received the copy of this report via the Public Register of the EU Cloud CoC[17].

Verification-date: July 2023   **Valid until**: July 2024

Verification-ID: 2022LVL02SCOPE3113

---

[17] https://eucoc.cloud/en/public-register/