

Verification of Declaration of Adherence

Declaring Company: ServiceNow Inc.



EU
CLOUD
COC

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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' or 'Code'**)¹ in its version 2.11 (**'v2.11'**)² as of December 2020.

Originally drafted by the Cloud Select Industry Group³ (**'C-SIG'**) the EU Cloud CoC – at that time called C-SIG Code of Conduct on data protection for Cloud Service Providers (**'CSPs'**) – was developed against Directive 95/46/EC⁴ 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 ServiceNow Platform ⁶

The ServiceNow platform is a cloud-based solution that provides a wide range of digital experiences to automate, predict, digitize, and optimize business processes and tasks across the enterprise. It offers a common, highly standardized cloud infrastructure, ensuring the security benefits of customer-specific isolation at the application and database layers.

ServiceNow provides a single product, platform, and support infrastructure, allowing for a large global security team dedicated to securing the Now Platform.

The platform offers a comprehensive security program that covers key physical, administrative, and logical security domains, including architecture, information lifecycle, physical security, security operations, disaster recovery/business continuity, privacy, compliance, and software development.⁷

The Cloud Service Family (ServiceNow Platform) comprises of the following:

2.1.1 IT Service Management (ITSM)

■ Admin Center

■ AI Search

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>

⁶ <https://www.servicenow.com/products-by-category.html>

⁷ **NOTE:** The content for the service description has been provided by the CSP and does not reflect any opinion of or assessment by the Monitoring Body.

- Asset Management Core
- Change Management
- Configuration Management Database (CMDB)
- Continual Improvement
- DevOps Change Velocity
- DevOps Config
- Digital End-user Experience
- Digital Portfolio Management
- Digital Product Release
- Employee Center
- Incident Management
- Knowledge Management

- Now Assist for ITSM
- Now Mobile
- Performance Analytics
- Predictive Intelligence
- Problem Management
- Process Mining
- Request Management
- Service Catalog
- Service Level Management
- Service Operations Workspace
- Service Portal
- Virtual Agent

2.1.2 IT Operations Management

- Now Assist for IT Operations Management
- Discovery
- Service Mapping
- Certificate Management
- Firewall Audits and Reporting
- Service Graph Connectors
- Configuration Management Database (CMDB)

- Agent Client Collector
- Event Management
- Metric Intelligence
- Health Log Analytics
- Cloud Accelerate
- Service Observability
- Synthetic Monitoring

2.1.3 HR Service Delivery

- Now Assist for HRSD
- Employee Center
- Employee Journey Management
- Issue Auto Resolution
- Case and Knowledge Management
- HR Agent Workspace
- Now Mobile
- Virtual Agent

- Universal Request
- Performance Analytics
- Predictive Intelligence
- Process Mining
- Employee Relations
- Alumni Service Center
- Workforce Optimization
- Employee Document Management

2.1.4 ServiceNow AI Agents

- AI
- Data

- Workflows

2.1.5 RaptorDB

- Configuration Management Database (CMDB)
- Common Services Data Model (CSDM)

- Integration Hub
- Now Assist
- Performance Analytics
- Stream Connect for Apache Kafka

- Vulnerability Response

2.1.6 Workflow Data Fabric

- Workflow Data Fabric

2.1.7 Workplace Service Delivery

- Workplace Central
- Workplace Concierge
- Workplace Space Management
- Workplace Case Management
- Workplace Agent for mobile
- Workplace Reservation Management
- Workplace Maintenance Management
- Workplace Lease Administration
- Workplace Indoor Mapping
- Workplace Move Management
- Workplace Visitor Management
- Workplace Connectors
- Employee Center
- Virtual Agent
- Performance Analytics

2.1.8 Customer Service Management (CSM)

- Virtual Agent
- Messaging Service
- Service Catalog
- Knowledge Management
- Engagement Messenger
- Communities
- Service Portal
- Process Optimization
- Proactive Customer Service
- Playbooks for Customer Service
- Performance Analytics
- Continual Improvement Management
- Case Types
- Case & Chat Summarization
- Workforce Optimization
- Predictive Intelligence
- Guided Decisions
- Advanced Work Assignment
- Configurable Workspace

2.1.9 Field Service Management

- Now Assist for Field Service Management
- Field Service Marketplace
- Schedule Optimization
- Mobile Agent
- Field Service Territory Planning
- Asset Management
- Workforce Optimization
- Dispatcher Workspace
- Field Service Contractor Management
- Capacity and Reservations Management
- Virtual Agent
- Inventory Management
- Task Bundling
- Field Service Multi-Day Task Scheduling
- Equipment Scheduling
- Field Service Crew Operations
- Continual Improvement Management
- Predictive Intelligence
- Performance Analytics
- Process Mining

2.1.10 App Engine

- Now Assist for Creator
- App Engine Studio
- App Engine Management Center
- Studio IDE

- Flow Designer
- Process Automation Designer
- Prebuilt Templates
- Delegated Development
- Mobile App Builder
- Guided Application Creator
- UI Builder

- Automated Testing Framework
- Service Portal
- Workspace Builder
- Performance Analytics
- Predictive Intelligence
- Virtual Agent
- Process Mining

2.1.11 Automation Engine

- Integration Hub
- RPA Hub
- Automation Center
- Document Intelligence

- Stream Connect for Apache Kafka
- Process Mining
- API Management

2.1.12 Strategic Portfolio Management (SPM)

- Now Assist for SPM
- Strategic Planning
- Scenario Planning
- Investment Funding
- Agile Development
- Project Portfolio Management
- Demand Management
- Collaborative Work Management

- Resource Management
- Innovation Management
- Digital Portfolio Management
- Predictive Intelligence
- Virtual Agent
- Process Mining
- Performance Analytics

2.1.13 Strategic Portfolio Management for Telecommunications

- Strategic Planning
- Collaborative Work Management
- Project Templates
- Now Assist for SPMT
- Investment Funding
- Agile Development
- Project Portfolio Management
- Resource Management
- Innovation Management
- Scenario Planning

- Financial Planning
- Digital Portfolio Management
- Portfolio Planning
- Predictive Intelligence
- Virtual Agent
- Process Mining
- Performance Analytics
- Demand Management
- Advanced Platform Analytics
- Test Management

2.1.14 IT Asset Management (ITAM)

- Software Asset Management
- Hardware Asset Management
- Enterprise Asset Management
- SaaS License Management

- Asset Management Executive Dashboard
- Asset Onboarding and Offboarding
- Contract and Renewal Management
- Cloud Cost Management

2.1.15 Enterprise Asset Management (EAM)

- Enterprise Asset Lifecycle Management
- Enterprise Asset Estate
- Operational Technology Asset Management
- Multi-Component Assets
- Enterprise Asset Inventory Management
- Planned Maintenance
- Indoor Mapping for Assets

- Asset Total Cost of Ownership
- Enterprise Asset Catalog
- Enterprise Asset Work Management
- Asset Onboarding and Offboarding
- Contract and Renewal Management
- Performance Analytics for EAM
- Asset Reservations
- Asset Inventory Audits
- Asset Calibration

2.1.16 ServiceNow Vault

- ServiceNow Platform Encryption
- Data Privacy
- ServiceNow Zero Trust Access

- Log Export Service
- Code Signing

2.1.17 ServiceNow Platform Encryption

- Cloud Encryption

- Field Encryption Enterprise

2.1.18 Security Operations (SecOps)

- Security Incident Response
- Vulnerability Response
- Security Posture Control
- Threat Intelligence Security Center
- Configuration Compliance

- Performance Analytics for Security Operations
- Now Assist for Security Operations
- Data Loss Prevention Incident Response

2.1.19 Third-Party Risk Management

- Onboarding, offboarding, and renewals due diligence
- Third-party portal
- Risk intelligence and ongoing monitoring
- Concentration risk map

- Third-party portfolio management
- Third-party risk management workspace
- Issue management and remediation
- Aggregated risk scores

2.1.20 Telecommunications Service Operations Management

- Now Assist for Telecom Service Operations Management
- Cross-Domain Event Management
- Single Service View
- Service Visualization

- Operational Intelligence
- Automated Remediation
- Service-Aware CMDB
- Service Health Dashboard
- TM Forum Open APIs

2.1.21 Operational Technology Management

- OT Asset Management
- OT Visibility

- OT Vulnerability Response
- OT Service Management

2.1.22 ServiceNow Cloud Observability

- Investigative Notebooks
- Correlation Engine
- OpenTelemetry
- Unified Query Language (UQL)
- Cloud-Native Logging
- Intelligent Alerts
- Unified Dashboards
- OpenTelemetry Service Mapping

2.1.23 Telecommunications Network Inventory

- Inventory Configurable Workspace
- Network Inventory Data Model
- Equipment Models and Templates
- Rack Visualization
- Hardware Asset Management
- Design and Assign
- Circuit User Interface
- Topology Visualization
- Planned Revisions
- Number Management
- Cable and Fiber Strand Management
- TM Forum Open APIs

2.1.24 Clinical Device Management

- Clinical Device Onboarding
- Clinical Device Risk Scores
- Clinical Device Move
- Indoor Mapping
- Suggested Parts for Tasks
- HL7 FHIR 7 Data Model
- Planned Work Management

2.1.25 Talent Development

- Manager Hub
- Leader Hub
- Employee Center Pro

2.1.26 Health and Safety

- Employee Center
- Health and Safety Incident Management
- Health and Safety Risk Mitigation Management
- Health and Safety Case Management

2.1.27 Legal Service Delivery

- Legal Request Management
- Legal Matter Management
- Practice Apps
- Legal Investigations
- Legal Contracts
- Legal Knowledge Management
- Employee Center
- Now Mobile
- Mobile Agent
- Virtual Agent

2.1.28 Sourcing and Procurement Operations

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

2.1.29 Supplier Lifecycle Operations

- Procurement Case Management
- Knowledge Management
- Reporting
- Now Mobile

- ERP Integration Framework
- Performance Analytics
- Virtual Agent

- Supplier Collaboration Portal
- App Engine Starter

2.1.30 Financial Services Operations

- Now Assist for Banking
- Now Assist for Insurance
- Service Bridge for Financial Operations
- 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
- Case and Knowledge Management
- Omnichannel

- Advanced Work Assignment
- Predictive Intelligence
- Self-Service
- Virtual Agent
- Knowledge Management
- Communities
- Visual Task Assignment
- 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

2.1.31 Telecommunications Service Management

- Now Assist for Telco
- Account Lifecycle Events
- Self-Service
- Engagement Messenger
- Service Bridge
- Proactive Service Experience Workflows
- Service Operations Workspace
- Omnichannel Engagement
- Service Portal
- Advanced Product Catalog

- Catalog Versioning
- Horizontal Catalog Dependencies
- 360° Customer View
- Service-Aware Install Base
- Service-Aware CMDB
- Customer Interaction Management
- SG Services
- Real-Time Service Health
- Guided Decisions
- Workforce Optimization
- Process Mining

2.1.32 Sales and Order Management

- Product Catalog Management
- Product Configurator
- Pricing Management
- Lead Management
- Opportunity Management
- Quote Management

- Contract Management Pro
- Order Management
- Self Service Portal
- Location-based Transactions
- Customer Lifecycle Workflows
- Customer Contracts and Entitlements

2.1.33 Sales and Order Management for Technology Providers

- Opportunity Management
- Quote Management
- Order Capture
- Order Management Workspace

- Catalog Driven Orchestration
- Staggered Order Decomposition
- Order Fallout Management
- Order Fulfillment

2.1.34 Sales and Order Management for Telecommunications

- Opportunity Management
- Quote Management
- Aligned to Industry Standards
- Order Management Workspace

- Catalog-Driven Orchestration
- Staggered Decomposition
- Order Fallout Management
- Order Fulfillment

2.1.35 Technology Provider Service Management

- Now Assist for Technology
- Service Bridge
- Proactive Service Experience Workflows
- Technology Product Support Case Application
- Operations Account 360 Degree
- Account Lifecycle Events
- Advanced Product Catalog
- Digital Portfolio Management
- Visual Workflow and Automation
- Persona-Based Workspaces
- Service Operations Workspace

- Service-Aware CMDB
- Common Service Data Model (CSDM)
- Investigate Framework
- Problem Management
- Service Management
- Remote Process Sync
- Remote Task
- Remote Catalog
- Performance Analytics
- Process Mining
- Predictive Intelligence
- Workforce Optimization

2.1.36 Healthcare and Life Sciences Service Management

- EMR Help
- HL7 FHIR Data Model
- Patient Support Services
- Patient 360
- Pre-Visit Management
- Consent Management
- Digital Documentation
- Workspaces
- Omnichannel
- Self-Service

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

2.1.37 Public Sector Digital Services

- Now Assist for Public Sector Digital Services
- Social Benefits Playbook

- License and Permit Playbook
- Information Request Playbook
- Service Request Playbook

2.1.38 Accounts Payable Operations

- Document Intelligence

- Procurement Case Management

- Now Mobile

2.1.39 Integrated Risk Management

- Policy and Compliance Management
- Risk Management
- Operational Risk Management
- Continuous Authorization and Monitoring
- Operational Resilience Management
- Regulatory Change Management

2.1.40 ServiceNow Impact

- ServiceNow Impact

2.1.41 Retail Service Management

- Generative AI
- Self-Service
- Workforce Optimization
- Process Mining
- Virtual Agent
- Guided Decisions
- Predictive Intelligence
- Performance Analytics
- Omnichannel

2.1.42 Retail Operations

- Virtual Agent
- Service Catalog
- Predictive Intelligence
- Retail Data Model

2.1.43 Manufacturing Connected Workforce

- App Engine Studio
- Flow Designer
- Now Mobile

2.1.44 Solutions

- Customer Service
- Cyber Security and Resilience
- Employee Experience
- Finance and supply Chain

- Knowledge Management

- Audit Management
- Use Case Accelerators
- Performance Analytics
- Employee Center
- Virtual Agent
- Predictive Intelligence

- Workspaces
- Case Management
- Retail Data Model
- Advanced Work Assignment
- Knowledge Management
- Task Intelligence
- Business Location 360
- Playbooks and Templates

- Business Location 360
- Self-Service
- Omnichannel
- Case Management

- Visual Task Boards
- Workspaces

- IT and Digital Operations
- Low Code and Intelligent Automation
- Operating Excellence

2.1.45 Integration Hub⁸

- Out-of-the-Box Spokes
- Packaged Integration Solutions
- Spoke Generator
- Flow Templates
- Stream Connect for Apache Kafka
- Remote Tables
- Custom Spokes
- Connections Dashboard
- Rest API Trigger
- Integration Hub Import

2.1.46 IntegrationHub Starter, Professional and Enterprise⁸⁹

2.1.46.1 STARTER

Spokes

- AI Search
- Cisco WebEx Teams
- Cisco WebEx Meetings
- Continuous Integration and Continuous Delivery (CI/CD) 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
- Smartrecruiters
- Utility Actions
- Vonage
- Workfront
- Workplace from Facebook
- Zoom
- Twilio

Protocols

- REST
- SOAP

Utilities

- Zip

Features

⁸ **NOTE:** 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.

⁹ **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.

- Payload Builder step
- Retry policies

- Remote Tables

2.1.46.2 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
- 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

2.1.46.3 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

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 GDPR¹⁰.

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 SRL¹¹.

The Code has been officially approved in May 2021¹². SCOPE Europe has been officially accredited as Monitoring Body in May 2021¹³. 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.¹⁴

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

¹⁰ <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679>

¹¹ <https://scope-europe.eu>

¹² <https://www.gegevensbeschermingsautoriteit.be/publications/decision-n05-2021-of-20-may-2021.pdf>

¹³ <https://www.gegevensbeschermingsautoriteit.be/publications/decision-n-06-2021-of-20-may-2021.pdf>

¹⁴ <https://eucoc.cloud/en/public-register/assessment-procedure/>

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 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 Mark¹⁵ and referring to the Public Register of the EU Cloud CoC¹⁶ 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 renewal¹⁷, 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

¹⁵ <https://eucoc.cloud/en/public-register/levels-of-compliance/>

¹⁶ <https://eucoc.cloud/en/public-register/>

¹⁷ You can access the Verification Report of previous year via the following link: [ServiceNow Verification Report \(2024\)](#)

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 was completed by the 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 CoC¹⁸, 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 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

¹⁸ <https://eucoc.cloud/en/about/about-eu-cloud-coc/applicable-procedures/>

this level of review were: 5.1.F-G, 5.2.A-B, 5.3.A, 5.3.C-E, 5.4.A-C, 5.4.E, 5.5.A-B, 5.5.E, 5.7.A-B, 5.7.E, 5.8.A, 5.9.B, 5.10.A-B, 5.11.B, 5.12.E, 5.12.G, 5.13.A-B, 5.14.B, 5.14.E-F, 6.1.C and 6.2.P.

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.

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 has assessed the information provided in support of Customers. ServiceNow demonstrated its contractual framework, which includes a Cloud Service Agreement ('CSA') defining the terms under which Customer Personal Data shall be processed, as well as the processing activities in relation to such data engaged in by the CSP and any subprocessors. ServiceNow confirmed that Customers are provided with the required assistance to comply with their obligations under Article 28 of the GDPR, as provided by the Code. This includes access to relevant compliance information through a dedicated platform and supporting documentation, as well as a dedicated communication channel to reach out for further assistance, including the option to contact the Data Protection Point of Contact.

When it comes to the assistance provided to the Customer, ServiceNow indicated that Customers are offered various self-service functionalities to independently deal with data subject requests ('DSRs'). Such functionalities cover areas such as deletion, retrieval and export of Customer Personal Data in a machine readable, commonly used, structured format. Information on these functionalities is provided to Customers through supporting documentation, and additional assistance with DSRs can be requested when necessary.

The Monitoring Body has assessed the mechanisms for third country transfers. ServiceNow confirmed that it relies on appropriate data transfer safeguards as provided by Chapter V of the GDPR, such as adequacy decisions and Standard Contractual Clauses ('SCCs'). Additionally, ServiceNow has implemented a mechanism to ensure that protective measures provided by such safeguards are implemented to secure data transfers.

The subprocessor management process has also been assessed by the Monitoring Body. ServiceNow affirmed that under its vendor management process, subprocessors' compliance is reviewed, and only those providing sufficient guarantees of compliance with the GDPR are engaged by the CSP. Furthermore, as per internal policies and procedures, it is ensured that the same data protection obligations and appropriate technical and organisational measures, as provided by ServiceNow to the Customers, are flown down throughout the full subprocessing chain.

Finally, the Monitoring Body has assessed media disposal and data wiping procedures. ServiceNow has provided information confirming that there are relevant policies and procedures in place to ensure that all storage media used to store Customer Personal Data are securely overwritten or sanitised before those media are re-used or sent for disposal.

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 CoC¹⁹ alongside this report.

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

6 Validity

This verification is valid for one year. The full report consists of 23 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 CoC²⁰.

Verification-date: July 2025

Valid until: July 2026

Verification-ID: 2022LVL02SCOPE3113

¹⁹ <https://eucoc.cloud/en/public-register/>

²⁰ <https://eucoc.cloud/en/public-register/>