# Technical and Organizational Measures (TOMs)

Purpose: Secure handling of customer data in the context of cross-browser and mobile device testing services.

Date: April 2025

# 1. Confidentiality

#### **Access Control**

- Role-based access control (RBAC) for internal systems.
- Access to production systems is limited to authorized personnel via VPN and SSH keys.
- Multi-factor authentication (MFA) is enforced for all staff accounts.
- Access logs are maintained and reviewed regularly.

#### **Data Encryption**

- All data in transit is encrypted using TLS 1.2 or higher.
- Customer test data, including logs and screenshots, are encrypted at rest using AES-256.

## **Staff Confidentiality**

- All employees sign confidentiality and data protection agreements.
- Regular training is provided on data protection and secure development practices.

# 2. Integrity

#### **Input Control**

- API and web UI are protected with authentication and rate limiting to prevent unauthorized manipulation of data.
- Input data validation and sanitation is implemented to avoid injection attacks.

#### **Data Separation**

- Customer test sessions are isolated: each test runs on its own single use Virtual Machine.
- Session logs, screenshots, and videos are assigned to unique test identifiers per user/project.

# 3. Availability and Resilience

### **Backup and Recovery**

- Regular backups are taken of essential infrastructure and customer data.
- Backups are encrypted and stored in geographically redundant locations.
- Disaster recovery plans are tested semi-annually.

## **High Availability**

- TestingBot infrastructure is hosted on highly available cloud environments.
- Automatic failover and load balancing mechanisms are in place for test execution and session management systems.

#### 4. Data Minimization and Retention

#### **Retention Policies**

- Test logs, screenshots, and videos are retained for a limited time (default 31 days unless configured otherwise by the customer).
- Users can delete their own test data at any time via the dashboard or API.

## **Data Disposal**

- Secure deletion procedures are followed when removing customer data from storage.
- Disks used for storage are securely wiped or destroyed at the end of their lifecycle.

# 5. Monitoring and Incident Response

## **Monitoring**

- All systems are monitored for uptime, performance, and unauthorized access attempts.
- Security event logs are centralized and retained for auditing.

## **Incident Management**

- A documented incident response policy is in place.
- Customers are notified of security incidents affecting their data in a timely manner, following GDPR Article 33.

# 6. Subprocessors

## **Subprocessor Oversight**

- All subprocessors are contractually bound to comply with data protection obligations.
- TestingBot maintains an up-to-date list of subprocessors at https://trust.testingbot.com

## 7. Audits and Certifications

# **Compliance**

- Regular internal audits are conducted to verify TOMs effectiveness.
- Third-party penetration testing is conducted at least annually.
- TestingBot follows industry best practices aligned with ISO 27001 and GDPR requirements.

## 8. Customer Control

# **Configuration Options**

- Customers can configure retention settings and access control for their teams.
- API keys and test visibility options (e.g., private tests) give customers granular control.