



System and Organization Controls 3 Report

Management's Report of its Assertions on the Effectiveness of Its Controls over the Workday Adaptive Planning Based on the Trust Services Criteria for Security, Availability, Confidentiality, Processing Integrity, and Privacy

For the Period October 1, 2021 to September 30, 2022





Management's Report of its Assertions on the Effectiveness of Its Controls over the Workday Adaptive Planning Based on the Trust Services Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy

We, as management of Workday, Inc., are responsible for:

- Identifying the Workday Adaptive Planning (System) and describing the boundaries of the System, which are presented in Attachment A
- Identifying our principal service commitments and system requirements which are presented in Attachment A
- Identifying the risks that would threaten the achievement of its service commitments and service requirements that are the objectives of our system
- Identifying, designing, implementing, operating, and monitoring effective controls over the Workday Adaptive Planning (System) to mitigate risks that threaten the achievement of the service commitments and system requirements
- Selecting the trust services categories that are the basis of our assertion

Workday, Inc. uses Amazon Web Services (AWS) and Microsoft Azure (Azure) (Subservice Organizations) to provide infrastructure-as-a-service (IaaS) services. The boundaries of the System presented in Attachment A includes only the controls of Workday, Inc. and excludes controls of AWS and Azure. However, the description of the boundaries of the system does present the types of controls Workday, Inc. assumes have been implemented, suitably designed, and operating effectively at AWS and Azure. Certain trust services criteria can be met only if AWS and Azure's controls assumed in the design of Workday, Inc.'s controls are suitably designed and operating effectively along with the related controls at Workday, Inc. However, we perform annual due diligence procedures for third-party sub-service providers and based on the procedures performed, nothing has been identified that prevents us from achieving our specified service commitments and system requirements.

We assert that the controls over the system were effective throughout the period October 1, 2021 to September 30, 2022, to provide reasonable assurance that the service commitments and system requirements were achieved based on the criteria relevant to security, availability, processing integrity, confidentiality, and privacy set forth in the AICPA's TSP section 100, *2017 Trust Services Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy*, if the Subservice Organizations applied the controls assumed in the design of Workday's controls throughout the period October 1, 2021 to September 30, 2022.

Workday, Inc.



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Report of Independent Accountants

Management of Workday, Inc.:

Scope

We have examined management's assertion, contained within the accompanying Management's Report of its Assertions on the Effectiveness of Its Controls over the Workday Adaptive Planning Based on the Trust Services Criteria for Security, Availability, Confidentiality, Processing Integrity, and Privacy (Assertion), that Workday, Inc.'s controls over the Workday Adaptive Planning (System) were effective throughout the period October 1, 2021 to September 30, 2022, to provide reasonable assurance that its service commitments and system requirements were achieved based on the criteria relevant to security, availability, confidentiality, processing integrity, and privacy (applicable trust services criteria) set forth in the AICPA's TSP section 100, *2017 Trust Services Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy*.

Workday, Inc. uses Amazon Web Services (AWS) and Microsoft Azure (Azure) (Subservice Organizations) to provide infrastructure-as-a-service (IaaS) services. The Description of the boundaries of the System (Attachment A) indicates that Workday, Inc.'s controls can provide reasonable assurance that certain service commitments and system requirements, based on the applicable trust services criteria, can be achieved only if AWS and Azure's controls, assumed in the design of Workday, Inc.'s controls, are suitably designed and operating effectively along with related controls at the service organization. The description of the boundaries of the system presents Workday, Inc.'s system and the types of controls that the service organization assumes have been implemented, suitably designed, and operating effectively at AWS and Azure. Our examination did not extend to the services provided by AWS and Azure and we have not evaluated whether the controls management assumes have been implemented at AWS and Azure have been implemented or whether such controls were suitably designed and operating effectively throughout the period October 1, 2021 to September 30, 2022.

Management's responsibilities

Workday management is responsible for its assertion, selecting the trust services categories and associated criteria on which its assertion is based, and having a reasonable basis for its assertion. It is also responsible for:

- Identifying the System and describing the boundaries of the System
- Identifying its service commitments and system requirements and the risks that would threaten the achievement of its service commitments and service requirements that are the objectives of the system
- Identifying, designing, implementing, operating, and monitoring effective controls over the System to mitigate risks that threaten the achievement of the service commitments and system requirement

Our responsibilities

Our responsibility is to express an opinion on the Assertion, based on our examination. 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. An examination involves performing procedures to obtain evidence about management's assertion, which includes: (1) obtaining an understanding of Workday's relevant security, availability, confidentiality, processing integrity, and privacy policies, processes and controls, (2) testing and evaluating the operating effectiveness of the controls, and (3) performing such other procedures as we considered necessary in the circumstances. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risk of material misstatement, whether due to fraud or error. We believe that the evidence obtained during our examination is sufficient to provide a reasonable basis for our opinion.

Our examination was not conducted for the purpose of evaluating Workday's cybersecurity risk management program. Accordingly, we do not express an opinion or any other form of assurance on its cybersecurity risk management program.

We are required to be independent of Workday, Inc. and to meet our other ethical responsibilities, as applicable for examination engagements set forth in the Preface: Applicable to All Members and Part 1 - Members in Public Practice of the Code of Professional Conduct established by the AICPA and have applied the AICPA's Statement on Quality Control Standards.

Inherent limitations

Because of their nature and inherent limitations, controls may not prevent, or detect and correct, all misstatements that may be considered relevant. Furthermore, the projection of any evaluations of effectiveness to future periods, or conclusions about the suitability of the design of the controls to achieve Workday's service commitments and system requirements, is subject to the risk that controls may become inadequate because of changes in conditions, that the degree of compliance with such controls may deteriorate, or that changes made to the system or controls, or the failure to make needed changes to the system or controls, may alter the validity of such evaluations. Examples of inherent limitations of internal controls related to security include (a) vulnerabilities in information technology components as a result of design by their manufacturer or developer; (b) breakdown of internal control at a vendor or business partner; and (c) persistent attackers with the resources to use advanced technical means and sophisticated social engineering techniques specifically targeting the entity.

Opinion

In our opinion, Workday, Inc.'s controls over the System were effective throughout the period October 1, 2021 to September 30, 2022, to provide reasonable assurance that its service commitments and system requirements were achieved based on the applicable trust services criteria if the Subservice Organization controls assumed in the design of Workday's controls operated effectively throughout the period October 1, 2021 to September 30, 2022.

A handwritten signature in black ink that reads 'Ernst & Young LLP'.

January 12, 2023



ATTACHMENT A - CORPORATE OVERVIEW AND SCOPE OF SERVICES

A. WORKDAY SYSTEMS OVERVIEW

Workday, Inc. (“Workday” or the “Company”), headquartered in Pleasanton, California, is a provider of enterprise cloud applications for finance and human resources. Founded in 2005, Workday delivers applications for financial management, human resources, planning, spend management, and analytics to thousands of organizations around the world and across industries. Organizations ranging from medium-sized businesses to Fortune 50 enterprises have selected Workday.

Workday’s top priority is keeping Customer Data secure. Workday employs security measures at the organization, architectural, and operational levels to ensure that Customer Data, applications, and infrastructure remain safe.

Workday Adaptive Planning Overview

Workday Adaptive Planning enables comprehensive planning for finance, sales, workforce, and operational planning, such as CRM, HR, and project planning. Workday Adaptive Planning empowers teams to better manage their business with agility through shared insights and seamless collaboration across the organization, powerful modeling for any business size, and with the speed to plan continuously using data from all corners of the business.

Architecture

Software as a Service (SaaS)

Workday delivers its applications via a software-as-a-service (SaaS) model. In this service delivery model, Workday is responsible for providing the infrastructure (i.e., hardware and middleware), data security, software development (i.e., software updates and patches), and operational processes (i.e., operation and management of the infrastructure and systems to support the service).

Multi-tenancy

Multi-tenancy is a key feature of the Workday Adaptive Planning application. Multi-tenancy enables multiple Customers to share one physical instance of the Workday Adaptive Planning system while isolating each tenant’s (Customer’s) application data. Every Workday Adaptive Planning account is associated with exactly one tenant. For authentication into the Workday Adaptive Planning application, login credentials submitted for the applicable regional cluster are processed by a central authentication service which routes users to their respective Customer tenant.

Hosting Environments

The Workday Adaptive Planning service is hosted in the public cloud, Amazon Web Services (AWS) and Microsoft Azure (Azure).



Sub-service Organizations and Complementary Subservice Organization Controls (CSOCs)

AWS and Azure are responsible for operating, managing, and controlling various components of the virtualization layer and storage as well as the physical security and environmental controls of these environments. Controls operated by AWS and Azure are not included in the scope of this report.

The affected criteria are included below along with the minimum controls expected to be in place at the aforementioned hosting provider(s):

Sub-service Organization – AWS	
Criteria	Control
<p>CC6.1: The entity implements logical access security software, infrastructure, and architectures over protected information assets to protect them from security events to meet the entity’s objectives.</p>	<p>Electronic intrusion detection systems are installed within data server locations to monitor, detect, and automatically alert appropriate personnel of security incidents.</p>
	<p>Firewall devices are configured to restrict access to the computing environment and enforce boundaries of computing clusters.</p>
	<p>VPC-Specific – Network communications within a VPN Gateway are isolated from network communications within other VPN Gateways.</p>
	<p>KMS-Specific – Roles and responsibilities for KMS cryptographic custodians are formally documented and agreed to by those individuals when they assume the role or when responsibilities change.</p>
	<p>KMS-Specific – The key provided by KMS to integrated services is a 256-bit key and is encrypted with a 256-bit AES master key unique to the customer’s AWS account.</p>
<p>CC6.2: Prior to issuing system credentials and granting system access, the entity registers and authorizes new internal and external users whose access is administered by the entity. For those users whose access is administered by the entity, user system credentials are removed when user access is no longer authorized.</p>	<p>IT access above least privileged, including administrator accounts, is approved by appropriate personnel prior to access provisioning.</p>
	<p>User access to Amazon systems is revoked within 24 hours of the employee record being terminated (deactivated) in the HR System by Human Resources.</p>

Sub-service Organization – AWS	
Criteria	Control
<p>CC6.3: The entity authorizes, modifies, or removes access to data, software, functions, and other protected information assets based on roles, responsibilities, or the system design and changes, giving consideration to the concepts of least privilege and segregation of duties, to meet the entity’s objectives.</p>	<p>IT access above least privileged, including administrator access, is approved by appropriate personnel prior to access provisioning.</p>
	<p>User access to Amazon systems is revoked within 24 hours of the employee record being terminated (deactivated) in the HR System by Human Resources.</p>
	<p>IT access privileges are reviewed on a periodic basis by appropriate personnel.</p>
<p>CC6.4: The entity restricts physical access to facilities and protected information assets (for example, data center facilities, back-up media storage, and other sensitive locations) to authorized personnel to meet the entity’s objectives.</p>	<p>Physical access to data centers is approved by an authorized individual.</p>
	<p>Physical access is revoked within 24 hours of the employee or vendor record being deactivated.</p>
<p>CC6.5: The entity discontinues logical and physical protections over physical assets only after the ability to read or recover data and software from those assets has been diminished and is no longer required to meet the entity’s objectives.</p>	<p>All AWS production media is securely decommissioned and physically destroyed prior to leaving AWS Secure Zones.</p>
<p>CC7.1: To meet its objectives, the entity uses detection and monitoring procedures to identify (1) changes to configurations that result in the introduction of new vulnerabilities, and (2) susceptibilities to newly discovered vulnerabilities.</p>	<p>AWS performs external vulnerability assessments at least quarterly, identified issues are investigated and tracked to resolution in a timely manner.</p>
<p>CC8.1: The entity authorizes, designs, develops or acquires, configures, documents, tests, approves, and implements changes to infrastructure, data, software, and procedures to meet its objectives.</p>	<p>AWS applies a systematic approach to managing change to ensure changes to customer-impacting aspects of a service are reviewed, tested and approved. Change management standards are based on Amazon guidelines and tailored to the specifics of each AWS service.</p>

Sub-service Organization – AWS	
Criteria	Control
<p>A1.2: The entity authorizes, designs, develops or acquires, implements, operates, approves, maintains, and monitors environmental protections, software, data back-up processes, and recovery infrastructure to meet its objectives.</p>	<p>Amazon-owned data centers are protected by fire detection and suppression systems.</p>
	<p>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.</p>
	<p>Uninterruptible Power Supply (UPS) units provide backup power in the event of an electrical failure in Amazon-owner data centers.</p>
	<p>Amazon-owned data centers have generators to provide backup power in case of electrical failure.</p>
	<p>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.</p>
	<p>AWS performs periodic reviews of colocation service providers to validate adherence with AWS security and operational standards.</p>

Sub-service Organization – AWS	
Criteria	Control
<p>A1.3: The entity tests recovery plan procedures supporting system recovery to meet its objectives.</p>	<p>When disk corruption or device failure is detected, the system automatically attempts to restore normal levels of object storage redundancy.</p>
	<p>Objects are stored redundantly across multiple fault-isolated facilities.</p>
	<p>The design of systems is sufficiently redundant to sustain the loss of a data center facility without interruption to the service.</p>
	<p>If enabled by the customer, RDS backs up customer databases, stored backups for user-defined retention periods, and supports point-in-time recovery.</p>

Sub-service Organization – Azure	
Criteria	Control
<p>CC6.1: The entity implements logical access security software, infrastructure, and architectures over protected information assets to protect them from security events to meet the entity's objectives.</p>	<p>Internal communication between key Azure components where customer data is transmitted / involved is secured using encryption.</p>
	<p>Logical segregation to restrict unauthorized access to other customer tenants is implemented.</p>
	<p>Production servers that reside in edge locations are encrypted at the drive level.</p>
	<p>Access to network devices in the scope boundary is restricted through a limited number of entry points that require authentication over an encrypted connection.</p>
	<p>Network filtering to prevent spoofed traffic and restrict incoming and outgoing traffic to trusted service components is implemented.</p>
	<p>Azure network is segregated to separate customer traffic from management traffic.</p>

Sub-service Organization – Azure	
Criteria	Control
<p>CC6.2: Prior to issuing system credentials and granting system access, the entity registers and authorizes new internal and external users whose access is administered by the entity. For those users whose access is administered by the entity, user system credentials are removed when user access is no longer authorized.</p>	<p>Administrative access to the Service environment is controlled through defined interfaces that require authentication using appropriate credentials. Privileges (i.e., read, write) are restricted to authorized personnel through designated channels based on job responsibilities.</p>
	<p>Requests for new access, or modifications to existing access, are submitted and approved prior to provisioning employee, contractors, and service provider access to specific applications of information resources.</p>
	<p>Access privileges are reviewed quarterly to determine if access rights are commensurate to the user’s job duties. Access is modified based on the results of the reviews.</p>
	<p>Procedures to automatically disable Active Directory (AD) accounts and manually remove any non-AD accounts upon user’s leave date are in place.</p>
	<p>Production domain-level user accounts for domains where passwords are in use are disabled after 90 days of inactivity.</p>
	<p>Procedures for granting Azure personnel temporary access to customer data and applications, upon appropriate approval for customer support or incident handling purposes, have been established.</p>

Sub-service Organization – Azure	
Criteria	Control
<p>CC6.3: The entity authorizes, modifies, or removes access to data, software, functions, and other protected information assets based on roles, responsibilities, or the system design and changes, giving consideration to the concepts of least privilege and segregation of duties, to meet the entity’s objectives.</p>	<p>Administrative access to the Service environment is controlled through defined interfaces that require authentication using appropriate credentials. Privileges (i.e., read, write) are restricted to authorized personnel through designated channels based on job responsibilities.</p>
	<p>Requests for new access, or modifications to existing access, are submitted and approved prior to provisioning employee, contractor, and service provider access to specific applications or information resources.</p>
	<p>Procedures to automatically disable Active Directory (AD) accounts and manually remove any non-AD accounts upon user’s leave date are in place.</p>
<p>CC6.4: The entity restricts physical access to facilities and protected information assets (for example, data center facilities, back-up media storage, and other sensitive locations) to authorized personnel to meet the entity’s objectives.</p>	<p>Procedures to restrict physical access to the datacenter to authorized employees, vendors, contractors, and visitors have been established.</p>
	<p>Security verification and check-in for personnel requiring temporary access to the interior of the datacenter facility, including tour groups or visitors, is required.</p>
	<p>Physical access to the datacenter is reviewed quarterly and verified by the Datacenter Management Team.</p>
	<p>Physical access mechanisms (e.g., access card readers, biometrics devices, man traps/portals, cages, locked cabinets) have been implemented and are administered to restrict access to authorized individuals.</p>
	<p>The datacenter facility is monitored 24x7 by security personnel.</p>

Sub-service Organization – Azure	
Criteria	Control
<p>CC6.5: The entity discontinues logical and physical protections over physical assets only after the ability to read or recover data and software from those assets has been diminished and is no longer required to meet the entity’s objectives.</p>	<p>Hard disk drive destruction guidelines for the disposal of hard drives have been established.</p>
	<p>Offsite backup tape destruction guidelines have been established and destruction certificates for expired backup tapes are retained.</p>
	<p>Datacenter team controls the delivery and removal of information system components through tickets on the Global Datacenter Operations (GDCO) ticketing system. Delivery and removal of information system components is authorized by system owners. System components/assets are tracked in the GDCO ticketing database.</p>
<p>CC7.1: To meet its objectives, the entity uses detection and monitoring procedures to identify (1) changes to configurations that result in the introduction of new vulnerabilities, and (2) susceptibilities to newly discovered vulnerabilities.</p>	<p>Procedures to monitor the Azure platform components for known security vulnerabilities have been established. Identified security vulnerabilities are remediated.</p>
	<p>Azure has implemented tools to perform integrity verification checks to detect unauthorized changes to software, firmware and information.</p>
	<p>A monitoring system to monitor the Azure platform for potential malicious activity and intrusion past service trust boundaries has been implemented.</p>

Sub-service Organization – Azure	
Criteria	Control
<p>CC8.1: The entity authorizes, designs, develops or acquires, configures, documents, tests, approves, and implements changes to infrastructure, data, software, and procedures to meet its objectives.</p>	<p>Procedures for managing different types of changes to the Azure platform have been documented and communicated.</p>
	<p>Key stakeholders approve changes prior to release into production based on documented change management procedures.</p>
	<p>Responsibilities for requesting, approving, and implementing changes to the Azure platform are segregated among designated personnel.</p>
	<p>Implemented changes to the Azure platform are reviewed for adherence to established procedures prior to closure. Changes are rolled back to their previous state in case of errors or security concerns.</p>
	<p>The Technical Security Services team develops security configuration standards for systems in the physical environment that are consistent with industry-accepted hardening standards. These configurations are documented in system baselines, are reviewed annually, and relevant configuration changes are communicated to impacted teams.</p>

Sub-service Organization – Azure	
Criteria	Control
<p>A1.2: The entity authorizes, designs, develops or acquires, implements, operates, approves, maintains, and monitors environmental protections, software, data back-up processes, and recovery infrastructure to meet its objectives.</p>	<p>Azure has developed a Business Continuity and Disaster Recovery (BC/DR) Standard Operating Procedure and documentation that includes the defined information security and availability requirements.</p>
	<p>The BCP team conducts testing of the business continuity and disaster recovery plans established for Azure services, per the defined testing schedule for different loss scenario. Each loss scenario is tested at least annually. Issues identified during testing are resolved and plans are updated accordingly.</p>
	<p>Backups of key Azure service components and secrets are performed regularly and stored in fault-tolerant (isolated) facilities. Backups are monitored and backup errors are investigated and followed-up on appropriately.</p>
	<p>Critical Azure components have been designed with redundancy to sustain isolated faults and minimize disruptions to customer services.</p>

Sub-service Organization – Azure	
Criteria	Control
<p>A1.3: The entity tests recovery plan procedures supporting system recovery to meet its objectives.</p>	<p>The BCP team conducts testing of the business continuity and disaster recovery plans established for Azure services, per the defined testing schedule for different loss scenario. Each loss scenario is tested at least annually. Issues identified during testing are resolved and plans are updated accordingly.</p>
	<p>A Datacenter Business Continuity Management Program defines business continuity planning and testing requirements for functions within the datacenters. Datacenters exercise, test and maintain the Datacenter Business Continuity Plan for the continued operations of critical processes and required resources in the event of a disruption at least annually. The ‘Business Continuity Management Exercise and Test Program Framework’ document establishes the basis and process for exercising and testing of the plans for continuity and resumption of critical datacenter processes.</p>
	<p>Backup restoration procedures are defined and backup data integrity checks are performed through standard restoration activities.</p>

B. PRINCIPAL SERVICE COMMITMENTS AND SYSTEM REQUIREMENTS

Workday designs its processes and procedures to meet its objectives for the Workday Adaptive Planning service. Those objectives are based on the service commitments that Workday makes to user entities, based on, among others, the trust services criteria for security, availability, confidentiality, processing integrity, and privacy, the laws and regulations that govern the provision of the Workday Adaptive Planning application, and the financial, system, operational and compliance requirements that Workday has established for the services.

Workday makes certain Availability, Confidentiality, Privacy, Processing Integrity, and Security representations to its Customers as detailed in the MSA, Service Level Agreements (SLAs) and other Customer agreements, as well as in the description of the service offering provided online and within this report. Availability, Confidentiality, Privacy, Processing Integrity, and Security commitments include, but are not limited to, the following:

- Security and privacy principles within the Service that are designed for configurable security and compliance with regulations.
- Policies and mechanisms put in place to appropriately secure and separate Customer Data.
- Regular security monitoring and audits of the environment.
- Use of formal HR business processes such as background checks and Security and Privacy trainings.
- Use of encryption technologies to protect Customer Data both at rest and in transit.
- Monitoring and resolution of system incidents.
- Documentation, testing, authorization, and approval of Software and Operational Changes.
- Maintenance and monitoring of backups to ensure successful replication to meet the service commitments.
- Data integrity and availability monitoring for Production tenants and Production level platform environments.

Workday establishes operational requirements that support the achievement of Availability, Confidentiality, Privacy, Processing Integrity, and Security commitments, relevant laws and regulations, and other system requirements. Such requirements are communicated in Workday system policies and procedures, system design documentation, and contracts with Customers. Information security policies define an organization-wide approach to how systems and data are protected. These include policies around how the service is designed and developed, how the system is operated, how the internal business systems and networks are managed, and how employees are hired and trained. In addition to these policies, standard operating procedures have been documented on how to carry out specific manual and automated processes required in the operation and development of these system requirements as they relate to Workday Adaptive Planning.



C. AVAILABILITY AND PROCESSING INTEGRITY

Operations teams are responsible for tracking and analyzing the availability of the Service for all customers in Production data center environments. Service availability metrics are reviewed by management on a quarterly basis. The process includes aggregation of the customer availability data on a monthly basis and comparison of that data to contractually-required Service Level Agreements (SLAs). This process also includes a monthly qualitative review based on the findings from activities that have an impact on the availability of the Service.

The processing integrity of Workday-delivered reports are covered in Workday's comprehensive Software Delivery process. This includes both manual end-to-end and automated Quality Assurance (QA) testing. Test procedures include, but are not limited to, data input/validation, recalculation, user interface, and security, to ensure functional design, completeness, and accuracy. For the Workday application, system validation occurs on data input into the application based on attribute type.

D. CONFIDENTIALITY

Signed nondisclosure agreements are required before information designated as confidential is shared with third parties. Workday maintains privacy and confidentiality practices in accordance with contractual obligations.

The Company does not, in the normal course of business, disclose Personal Data provided to the Company to third parties.

For operational processes outsourced to third parties, Workday obtains assurance through a report or certification on the effectiveness of the control environment documented by the outsourced provider's independent auditor. Each report or certification is reviewed on an annual basis by the Technology Compliance team, and reviews are documented using an internal tracking system. Security and privacy considerations are evaluated during the vendor contracting process. Any issues identified are evaluated based on risk and potential impact to the Company and its Customers.

The Company maintains privacy and confidentiality practices in accordance with contractual obligations. If privacy and confidentiality practices are materially lessened, customer consent is obtained prior to implementing the less restrictive practices.

E. PRIVACY AND SECURITY

Privacy Program

Privacy by Design and Privacy by Default principles are closely tied to Workday's core values and guide how Workday builds products, develops software, and operates services. In providing its Service, Workday has implemented policies and procedures that comply with global data protection laws and regulations. Detailed review by the Privacy and Compliance teams helps ensure products and releases adhere to applicable laws and requirements as well as internal documented policies and procedures. All major application releases are approved by the Chief Privacy Officer before moving to production, representing that Workday develops and designs its Service in conjunction with established Privacy by Design and Privacy by Default principles.



Security Program

Workday maintains a formal and comprehensive security program designed to ensure the security and integrity of customer data, protect against security threats or data breaches, and prevent unauthorized access to our customers' data.

F. CONTROL ENVIRONMENT

Leadership and Management

Workday Management is responsible for directing and controlling operations, as well as establishing, communicating, and monitoring company-wide policies and procedures. Management places a consistent emphasis on maintaining comprehensive, relevant internal controls and on communicating and maintaining high integrity and ethical values of the Company's personnel. Core values, key strategic elements, and behavioral standards are communicated to employees through new hire orientation, policy statements and guidelines, and regular company communications.

Personnel Security

Hiring Practices

Integrity and high ethical standards are fundamental values to Workday. Workday employs people who are selected for their intuition, intelligence, integrity, and passion for delivering superior solutions to Customers. Employment candidates are evaluated by Workday to determine whether their skills and experience are a fit for the Company prior to hire.

Enterprise Risk Management

Financial, IT, security, privacy, and relevant industry risks are periodically assessed and reviewed by Workday senior management.

On an annual basis, a formal risk assessment is performed by the Privacy and Technology Compliance teams as part of the ISO27001 Information Security Management System (ISMS) requirements. The risk assessment is performed by using the Workday ISO27001 risk assessment as a basis for risk identification, with additional risks that threaten the achievement of the control objectives added as appropriate. As part of this process, threats to security, confidentiality, availability, and integrity of Customer Data and threats to the privacy and protection of personal data provided as Customer Data are identified and the risks from these threats are formally assessed.

Based on the risk assessment, program changes are made, as necessary, and the Privacy and Technology Compliance teams monitor the effectiveness of the associated programs, including the Privacy program.

Information Communication

Management is committed to maintaining effective communication with all personnel, Customers, and business partners. Issues or suggestions identified by Company personnel are promptly brought to the attention of management to be addressed and resolved.

To help align Workday's business strategies and goals with operating performance for its Customers, the Company's Products and Technology Release team has established appropriate communication methods and periodic meetings to review status and issues related to upcoming releases. Workday documents and shares internal content using web-based documentation repositories and issue tracking tools.



The Company regularly posts information about product enhancements on Workday Community. Workday Community contains information to assist Customers with Workday Adaptive Planning.

Monitoring

Operations teams are responsible for monitoring the effectiveness of internal controls in the normal course of operations. Deviations in the operation of internal controls, including major security, availability, and processing integrity events are reported to senior management. In addition, any Customer issues are communicated to the appropriate personnel using a web-based issue tracking tool.