HITRUST

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October 31, 2019

Google
111 8th Ave
4th Floor
New York, NY 10011

Based upon representation from management as to the accuracy and completeness of information provided, the procedures performed by an Authorized External Assessor to validate such information, and HITRUST's independent confirmation that the work was performed in accordance with the HITRUST® CSF Assurance Program, the following systems and supporting infrastructure of the Organization ("Scope") meet the HITRUST CSF® v9.2 certification criteria:

> Google: Google Cloud Platform (GCP) and Google Workspace (Formerly G Suite).

The certification is valid for a period of two years assuming the following occurs:

- A monitoring program is in place to determine if the controls continue to operate effectively over time,
- Annual progress is being made on areas identified in the Corrective Action Plan(s) (CAPs),
- No data security breach reportable to a federal or state agency by law or regulation has occurred,
- No significant changes in the business or security policies, practices, controls, and processes have occurred that might impact its ability to meet the HITRUST CSF certification criteria, and
- Timely completion of the interim assessment as defined in the HITRUST CSF Assurance Program Requirements.

HITRUST has developed the HITRUST CSF, a certifiable framework that provides organizations with the needed structure, detail and clarity relating to information protection. With input from leading organizations within the industry, HITRUST identified a subset of the HITRUST CSF control requirements that an organization must meet to be HITRUST CSF Certified. For those HITRUST CSF control requirements that are not currently being met, the Organization must have a CAP that outlines its plans for meeting such requirements.

HITRUST performs a quality assurance review consistent with the HITRUST CSF Assurance Program requirements to ensure that the scores are consistent with the testing performed by the Authorized External Assessor. In addition to the full report that follows, users of the report can refer to the document *Leveraging HITRUST CSF Assessment Reports: A Guide for New Users* for questions on interpreting the results contained herein or contact HITRUST customer support at *support@hitrustalliance.net.* Users of this report are also assumed to be familiar with and

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understand the services provided by the Organization listed above, and what specific services are being used by the user organization.

A full copy of the HITRUST CSF Certification Report has also been issued to the organization listed above; if interested in obtaining a copy of the full report, you will need to contact the organization directly. Additional information on the HITRUST CSF Certification program can be found at the HITRUST website at *https://hitrustalliance.net.*

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Enclosures (2): Assessment Context, Scope of Systems in the Assessment

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Assessment Context

Prepared for	Google 111 8th Ave 4th Floor New York, NY 10011
Contact	Sam Morales Program Manager, Engineering Compliance smorales@google.com
Assessment Option	HITRUST CSF Security Assessment
Company Background	Google Cloud Platform is a suite of products & services that includes application hosting, cloud computing, database services and more. Google Workspace (Formerly G Suite) from Google Cloud. A set of intelligent apps including Gmail, Docs, Drive and Calendar to connect the people in your company, no matter where in the world they are.
Number of Employees	27000
Geographic Scope of Operations Considered	Off-shore (outside U.S.)

Organizational Risk Factors

Number of Records that are currently held	More than 60 Million Records

Systematic Risk Factors

Is the system(s) accessible from the Internet?	Yes
Is the scoped system(s) (on-premise or cloud-based) accessible by third-party personnel (e.g., business partners, vendors, cloud providers)?	No
Does the system(s) transmit or receive data with a third party/business partner?	Yes
Is the system(s) accessible from a public location?	No
Number of interfaces to other systems	Greater than 75

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Number of users of the system(s)	Greater than 5,500
Number of transactions per day	Greater than 85,000

Regulatory Risk Factors

Subject to HIPAA

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Scope of Systems in the Assessment

Organization and Industry Segment Overview

Google LLC ("Google") is a global technology service provider focused on improving the ways people connect with information. Google's innovations in web search and advertising have made it one of the most viewed Internet destinations and its brand among the most recognized in the world. Google maintains one of the world's largest online indexes of web sites and other content and makes this information freely available to anyone with an Internet connection. Google offers Internet-based services and tools that users can consume to communicate, collaborate, and work more efficiently.

Service(s) / Product(s) Provided

Google's product offerings, including Google Workspace (Formerly G Suite) and Google Cloud Platform, provide the unique advantage of leveraging the resources of Google's core engineering team while also having a dedicated team to develop solutions for the corporate market. As a result, these Google offerings are positioned to innovate at a rapid rate and provide the same level of service that users are familiar with on google.com.

Google Workspace (Formerly G Suite) is targeted to small and medium businesses and large corporations alike. This product provides what business organizations typically require, including the following:

- Multi-user collaboration

- No special hardware or software required by the enterprise

- Security and compliance features

- Seamless upgrades

Google Cloud Platform (GCP) provides Infrastructure as a Service ("IaaS") and Platform as a Service ("PaaS") offerings, allowing businesses and developers to build and run any applications and other workloads on Google's scalable infrastructure. Users can benefit from performance, scale, reliability, ease-of-use and management, and a pay-as-you-go cost model.

Google Cloud Platform is targeted towards individual developers, small and medium size businesses, and large corporations alike, as well as the development teams within those organizations. Google Cloud Platform services can be divided into several major categories:

- Big Data - tools to capture, process, store and analyze data on a single platform

- Cloud Management - manage apps on GCP with a web-based console, mobile app , or Cloud Shell for real time monitoring, logging, diagnostics, and configuration

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- Computation - a scalable range of computing options tailored to match the size and needs of an organization

- Developer Tools - a rich collection of tools and libraries that help development teams manage their cloud resources quickly and effectively

- Identity and Access Management Services - manage users, groups, permissions, and other security and access configurations for cloud assets, supported by Google's own protection of its infrastructure

- Machine Learning - fast, scalable and easy to use modern machine learning services, with pre-trained models and the ability to generate tailored models

- Networking - a high quality private network using software-defined networking and distributed systems technologies to host and deliver services around the world

- Storage - scalable storage options and varieties for different needs and price points

Primary System(s)

Google uses a common infrastructure for provisioning access to systems within the Google Cloud Platform and Google Workspace (Formerly G Suite) Systems. Refer to the Scope Overview table for the system profile used.

Service(s) Outsourced

There are no outsourced services for the scope of this assessment.

Scope Overview

The scope of this assessment is limited to the Google Cloud Platform and Google Workspace (Formerly G Suite) products.

System Name	Components	Service Offering	Full	Partial	With Exclusions	Description of Exclusions
Google Cloud Platform (GCP)	OS – Linux DB – Google Proprietary Database	Google Cloud Platform (GCP)	X			
Google Workspace (Formerly G Suite)	OS – Linux DB – Google Proprietary Database	Google Workspace (Formerly G Suite)	X			

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Scope Description

Refer to the Services and Products Provided section for further description of the Google Cloud Platform and Google Workspace (Formerly G Suite) products.