



SOC 2 Type II Report

Throughout the Period of November 01, 2024 to October 31, 2025

**REPORT ON CONTROLS PLACED IN OPERATION AT LUSHA SYSTEMS LTD.
RELEVANT TO SECURITY, AVAILABILITY, CONFIDENTIALITY AND PRIVACY
WITH THE INDEPENDENT SERVICE AUDITOR'S REPORT
INCLUDING TESTS PERFORMED AND RESULTS THEREOF.**



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Section I - Lusha Systems Ltd.'s Management Assertion

December 10, 2025

We have prepared the accompanying description titled "Description of the Lusha Platform relevant to Security, Availability, Confidentiality and Privacy throughout the period November 01, 2024 to October 31, 2025" (Description) of Lusha Systems Ltd. (Service Organization) in accordance with the criteria for a description of a service organization's system set forth in the Description Criteria DC section 200 2018 Description Criteria for a Description of a Service Organization's System in a SOC 2 Report (Description Criteria). The Description is intended to provide report users with information about the Lusha Platform (System) that may be useful when assessing the risks arising from interactions with the System, particularly information about system controls that the Service Organization has designed, implemented and operated to provide reasonable assurance that its service commitments and system requirements were achieved based on the trust services criteria relevant to Security, Availability, Confidentiality and Privacy (applicable trust services criteria) set forth in TSP section 100, *2017 Trust Services Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy, in AICPA Trust Services Criteria*.

Carved-out Unaffiliated Subservice Organization: Lusha Systems Ltd. uses Amazon Web Services ('AWS') to provide infrastructure management services. The Description indicates that complementary controls at AWS that are suitably designed and operating effectively are necessary, along with controls at Lusha Systems Ltd. to achieve Lusha Systems Ltd.'s service commitments and system requirements, based on the applicable trust services criteria. The Description presents Lusha Systems Ltd.'s controls and the types of complementary subservice organization controls assumed in the design of Lusha Systems Ltd.'s controls. The Description does not disclose the actual controls at the carved-out AWS.

Complementary user entity controls: The Description also indicates complementary user entity controls that are suitably designed and operating effectively are necessary along with Lusha Systems Ltd.'s controls to achieve the service commitments and system requirements. The Description presents Lusha Systems Ltd.'s controls and the complementary user entity controls assumed in the design of Lusha Systems Ltd.'s controls.

We confirm, to the best of our knowledge and belief, that:

- a. The Description presents the System that was designed and implemented throughout the period November 01, 2024 to October 31, 2025 in accordance with the Description Criteria.
- b. The controls stated in the Description were suitably designed throughout the period November 01, 2024 to October 31, 2025 to provide reasonable assurance that Lusha Systems Ltd.'s service commitments and system requirements would be achieved based on the applicable trust services criteria, if its controls operated effectively throughout that period and if user entities applied the complementary user entity controls and the carved-out subservice organization applied the complementary controls assumed in the design of Lusha Systems Ltd.'s controls throughout that period.
- c. The Lusha Systems Ltd. controls stated in the Description operated effectively throughout the period November 01, 2024 to October 31, 2025 to provide reasonable assurance that Lusha Systems Ltd.'s service commitments and system requirements were achieved based on the applicable trust services criteria, if the complementary user entity controls and the complementary carved-out subservice organization controls assumed in the design of Lusha Systems Ltd.'s controls operated effectively throughout that period.

Signed by:

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Section II - Independent service auditor's report

To the Management of Lusha Systems Ltd.

Scope

We have examined Lusha Systems Ltd.'s accompanying description titled "Description of the Lusha Platform relevant to Security, Availability, Confidentiality and Privacy throughout the period November 01, 2024 to October 31, 2025" (Description) in accordance with the criteria for a description of a service organization's system set forth in the Description Criteria DC section 200, *2018 Description Criteria for a Description of a Service Organization's System in a SOC 2 Report*, (Description Criteria) and the suitability of the design and operating effectiveness of controls stated in the Description throughout the period November 01, 2024 to October 31, 2025 to provide reasonable assurance that the service commitments and system requirements were achieved based on the trust services criteria relevant to Security, Availability, Confidentiality and Privacy (applicable trust services criteria) set forth in TSP section 100, *2017 Trust Services Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy*, in AICPA Trust Services Criteria.

Carved-out Unaffiliated Subservice Organization: Lusha Systems Ltd. uses AWS (subservice organization) to provide infrastructure management services. The Description indicates that complementary subservice organization controls that are suitably designed and operating effectively are necessary, along with controls at Lusha Systems Ltd., to provide reasonable assurance that Lusha Systems Ltd.'s service commitments and system requirements are achieved based on the applicable trust services criteria. The description presents Lusha Systems Ltd.'s system; its controls relevant to the applicable trust services criteria; and the types of complementary subservice organization controls that the service organization assumes have been implemented, suitably designed, and are operating effectively at AWS. The Description does not disclose the actual controls at AWS. Our examination did not include the services provided by AWS and we have not evaluated whether the controls management assumes have been implemented at AWS have been implemented or whether such controls were suitably designed and operating effectively throughout the period November 01, 2024 to October 31, 2025.

Complementary user entity controls: The Description indicates that Lusha Systems Ltd.'s controls can provide reasonable assurance that certain service commitments and system requirements can be achieved only if complementary user entity controls assumed in the design of Lusha Systems Ltd.'s controls are suitably designed and operating effectively, along with related controls at the service organization. Our examination did not include such complementary user entity controls and we have not evaluated the suitability of the design or operating effectiveness of such complementary user entity controls.

Lusha Systems Ltd.'s responsibilities

Lusha Systems Ltd. is responsible for its service commitments and system requirements and for designing, implementing, and operating effective controls within the system to provide reasonable assurance that its service commitments and system requirements were achieved. Lusha Systems Ltd. has provided the accompanying assertion titled, Lusha Systems Ltd.'s Management Assertion (Assertion) about the presentation of the Description based on the Description Criteria and the suitability of design and operating effectiveness of controls stated therein to provide reasonable assurance that the service commitments and system requirements would be achieved based on the applicable trust services criteria. Lusha Systems Ltd. is responsible for (1) preparing the Description and Assertion; (2) the completeness, accuracy, and method of presentation of the Description and Assertion; (3) providing the services covered by the Description; (4) selecting the trust services categories addressed by the engagement and stating the applicable trust services criteria and related controls in the Description; (5) identifying the risks that threaten the achievement of the service organization's service commitments and system requirements; and (6) designing, implementing, and documenting controls that are suitably designed and operating effectively to achieve its service commitments and system requirements.

Service auditor's responsibilities

Our responsibility is to express an opinion on the presentation of the Description and on the suitability of design and operating effectiveness of controls stated therein to achieve the service organization's service commitments and system requirements based on our examination.

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants ("AICPA"). Those standards require that we plan and perform our examination to obtain reasonable assurance about whether, in all material respects, (1) the Description is presented in accordance with the Description Criteria, and (2) the controls stated therein were suitably designed and operating effectively to provide reasonable assurance that the service organization's service commitments and system requirements were achieved based on the applicable trust services criteria throughout the period November 01, 2024 to October 31, 2025. 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 we have obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

An examination of a description of a service organization's system and the suitability of the design and operating effectiveness of controls involves:

- obtaining an understanding of the system and the service organization's service commitments and system requirements.
- assessing the risks that the Description is not presented in accordance with the Description Criteria and that controls were not suitably designed or operating effectively based on the applicable trust services criteria.
- performing procedures to obtain evidence about whether the Description is presented in accordance with the Description Criteria.
- performing procedures to obtain evidence about whether controls stated in the Description were suitably designed to provide reasonable assurance that the service organization achieved its service commitments and system requirements based on the applicable trust services criteria.
- testing the operating effectiveness of those controls to provide reasonable assurance that the service organization's service commitments and system requirements were achieved based on the applicable trust services criteria.
- evaluating the overall presentation of the Description.

Our examination also included performing such other procedures as we considered necessary in the circumstances.

We are required to be independent of Lusha Systems Ltd. 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.

Inherent limitations

The Description is prepared to meet the common needs of a broad range of report users and may not, therefore, include every aspect of the system that individual users may consider important to meet their informational needs.

There are inherent limitations in the effectiveness of any system of internal control, including the possibility of human error and the circumvention of controls. Because of their nature, controls at a service organization may not always operate effectively to provide reasonable assurance that the service organization's service commitments and system requirements are achieved based on the applicable trust services criteria. Also, the projection to the future of any evaluation of the presentation of the Description, or conclusions about the suitability of the design or operating effectiveness of the controls to achieve the service commitments and system requirements based on the applicable trust services criteria, is subject to the risk that the system may change or that controls at a service organization may become ineffective.



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Description of tests of controls

The specific controls we tested, and the nature, timing, and results of those tests are listed in the accompanying Description of Criteria, Controls, Tests, and Results of Tests (Description of Tests and Results).

Opinion

In our opinion, in all material respects:

- a. the Description presents the Lusha Platform system that was designed and implemented throughout the period November 01, 2024 to October 31, 2025 in accordance with the Description Criteria.
- b. the controls stated in the Description were suitably designed throughout the period November 01, 2024 to October 31, 2025, to provide reasonable assurance that Lusha Systems Ltd.'s service commitments and system requirements would be achieved based on the applicable trust services criteria if its controls operated effectively throughout that period and if the subservice organization and user entities applied the complementary controls assumed in the design of Lusha Systems Ltd.'s controls throughout that period.
- c. the controls stated in the Description operated effectively throughout the period November 01, 2024 to October 31, 2025 to provide reasonable assurance that Lusha Systems Ltd. service commitments and system requirements were achieved based on the applicable trust services criteria if the complementary subservice organization and user entity controls assumed in the design of Lusha Systems Ltd.'s controls operated effectively throughout that period.

Restricted use

This report, including the description of tests of controls and results thereof in the Description of Tests and Results, is intended solely for the information and use of Lusha Systems Ltd., user entities of Lusha Systems Ltd.'s Lusha Platform system during some or all of the period November 01, 2024 to October 31, 2025 and prospective user entities, independent auditors and practitioners providing services to such user entities, and regulators who have sufficient knowledge and understanding of the following:

- the nature of the service provided by the service organization
- how the service organization's system interacts with user entities, subservice organizations, or other parties
- internal control and its limitations
- complementary user entity controls and complementary subservice organization controls and how those controls interact with the controls at the service organization to achieve the service organization's service commitments and system requirements
- user entity responsibilities and how they interact with related controls at the service organization
- the applicable trust services criteria
- the risks that may threaten the achievement of the service organization's service commitments and system requirements and how controls address those risks

This report is not intended to be, and should not be, used by anyone other than these specified parties.

Kost Forer Gabbay and Kasierer

A member firm of Ernst & Young Global Limited

December 10, 2025

Tel-Aviv, Israel