

Beijing Feishu Technology Co., Ltd.

System and Organization Controls 3 (SOC 3) Report
Report on Feishu Suite system relevant to Security, Availability, Confidentiality and
Privacy
Throughout the Period December 1, 2020 to May 31, 2021

Management of Beijing Feishu Technology Co., Ltd.’s Assertion

We are responsible for designing, implementing, operating, and maintaining effective controls within Beijing Feishu Technology Co., Ltd.’s (Feishu Technology’s) Feishu Suite system throughout the period December 1, 2020, to May 31, 2021, to provide reasonable assurance that Feishu Technology’s service commitments and system requirements relevant to security, availability, confidentiality, and privacy were achieved. Our description of the boundaries of the system is presented in Attachment A and identifies the aspects of the system covered by our assertion.

We have performed an evaluation of the effectiveness of the controls within the system throughout the period December 1, 2020, to May 31, 2021, to provide reasonable assurance that Feishu Technology’s 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* (AICPA, *Trust Services Criteria*). Feishu Technology’s objectives for the system in applying the applicable trust services criteria are embodied in its service commitments and system requirements relevant to the applicable trust services criteria. The principal service commitments and system requirements related to the applicable trust services criteria are presented in Attachment B.

There are inherent limitations in any system of internal control, including the possibility of human error and the circumvention of controls. Because of these inherent limitations, a service organization may achieve reasonable, but not absolute, assurance that its service commitments and system requirements are achieved.

We assert that the controls within the system were effective throughout the period December 1, 2020 to May 31, 2021, to provide reasonable assurance that Feishu Technology’s service commitments and system requirements were achieved based on the applicable trust services criteria.

Beijing Feishu Technology Co., Ltd.
July 30, 2021



Report of Independent Service Auditors

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To: Beijing Feishu Technology Co., Ltd.

Scope

We have examined Beijing Feishu Technology Co., Ltd.'s (Feishu Technology's) accompanying assertion titled "Management of Beijing Feishu Technology Co., Ltd.'s Assertion" (assertion) that the controls within Feishu Technology's Feishu Suite system (system) were effective throughout the period December 1, 2020, to May 31, 2021, to provide reasonable assurance that Feishu Technology's 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* (AICPA, *Trust Services Criteria*).

Service Organization's Responsibilities

Feishu Technology 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 Feishu Technology's service commitments and system requirements were achieved. Feishu Technology has also provided the accompanying assertion about the effectiveness of controls within the system. When preparing its assertion, Feishu Technology is responsible for selecting, and identifying in its assertion, the applicable trust service criteria and for having a reasonable basis for its assertion by performing an assessment of the effectiveness of the controls within the system.

Service Auditor's Responsibilities

Our responsibility is to express an opinion, based on our examination, on whether management's assertion that controls within the system were effective throughout the period to provide reasonable assurance that the service organization's service commitments and system requirements were achieved based on the applicable trust services criteria. 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. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

Our examination included:

- Obtaining an understanding of the system and the service organization's service commitments and system requirements

- Assessing the risks that controls were not effective to achieve Feishu Technology's service commitments and system requirements based on the applicable trust services criteria
- Performing procedures to obtain evidence about whether controls within the system were effective to achieve Feishu Technology's service commitments and system requirements based on the applicable trust services criteria

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

Inherent Limitations

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 may not always operate effectively to provide reasonable assurance that the service organization's service commitments and system requirements were achieved based on the applicable trust services criteria. Also, the projection to the future of any conclusions about the effectiveness of controls is subject to the risk that controls may become inadequate because of changes in conditions or that the degree of compliance with the policies or procedures may deteriorate.

Opinion

In our opinion, management's assertion that the controls within Beijing Feishu Technology Co., Ltd.'s Feishu Suite system were effective throughout the period December 1, 2020, to May 31, 2021, to provide reasonable assurance that Feishu Technology's service commitments and system requirements were achieved based on the applicable trust services criteria is fairly stated, in all material respects.

PricewaterhouseCoopers Zhong Tian LLP
PricewaterhouseCoopers Zhong Tian LLP
Shanghai, The People's Republic of China
July 30, 2021



Attachment A.

Beijing Feishu Technology Co., Ltd.’s Description of the Feishu Suite

I. Overview

Company Overview

Founded in 2016, Beijing Feishu Technology Co., Ltd. (“Feishu Technology” or “The Company”) provides cloud-based Software-as-a-Service (“SaaS”) as the core of its service. The Company is dedicated to developing and providing secure, stable and reliable cloud-based office suite solutions with a mission to enable user entities to transform the way they work and provide cloud-based office suite services.

Services and System

Feishu Suite of Feishu Technology provide SaaS cloud services for collaborative work, organization and human resources, and Corporate Finance and Law, which are mobile-friendly, support real-time collaboration and provide single access. The Feishu Suite help user entities improve work efficiency and reduce production cost and administrative cost, so as to enable them to shift to more efficient, better coordinated and more secure intelligentized businesses.

II. Services and Data Centers covered by the Description

The scope of services covered in this report includes:

- | | |
|--------------------|---------------|
| • Instant Message | • Helpdesk |
| • Calendar | • Email |
| • Video Conference | • OKR |
| • Cloud Document | • Payroll |
| • Knowledge Base | • Recruitment |
| • Cloud Storage | • Contracts |
| • Open Platform | |

as well as the three data centers supporting the services which located in Huailai, Heibei, Lingqiu, Shanxi and Langfang, Hebei. The data centers mentioned above are operated by Hebei Qinhuai Data Co., Ltd., Beijing Qinhuai Data Co., Ltd. and China Telecom Co., Ltd. Beijing Telecom Company (the “subservice organizations”) respectively that provide colocation service. The internal controls of the subservice organizations (such as physical access and physical environmental security, etc.) are excluded in the report.

III. Services covered by this System Description

Collaborative Office

Instant Message

Instant Message supports online communication, transmission of text messages, documents and pictures as well as voice and video communication via Instant Message technology. The messages are stored in cloud and synchronized to all devices automatically. When new members join the group, they can view all historical messages anytime and anywhere. It is conducive for new members to integrate into the team and project quickly, reduce communication costs and improve efficiency.

Cloud Document

Cloud Document (“Docs”) supports multiple users to edit online document simultaneously. The formats of the document include Word, Excel and Mind Notes. Multiple users can collaborate with each other to edit the same document and the document can be set as private or shared. Docs are prohibited to share outside the tenant by default, unless the document is set to share outside the tenant. Docs supports the insertion of text, pictures, tables, files, videos, task lists and other types of content. Docs is not only about documents, but also rich creative and interactive tools.

Cloud Storage

Cloud Storage supports high-speed uploads and downloads, previews of multi-format files. All files are stored in cloud computing environment in real time to build online corporate knowledge center, rather than stored locally. Cloud Storage also enables the historical record to be traced back or restored at any time that allows users to view, edit, share and access their files anywhere, on any device to make the most of knowledge resources.

Calendar

Calendar is designed to help businesses and users coordinate and arrange personnel, conference rooms and other resources to achieve more intelligent synergy of schedule management. Calendar supports schedule creation, conference invitation, one-click conference group creation, schedule sharing, subscription to others’ schedules and public calendar creation, etc. Calendar is deeply integrated with Instant Message and Docs, so that team members can easily plan and share schedules, keep in sync all the time, and organize meetings and project scheduling more efficiently.

Video Conference

Video Conference is deeply integrated with Instant Message and Calendar. Video conference can be started in group chat or calendar meeting invitation. It also supports launching live teleconference of 10,000 people with one click, sharing screen or document conveniently, and remote coordination can be achieved as on-site. In Video Conference, the host can record the audio and video of the conference in a real time. The recorded content is stored automatically in cloud for future retrospect.

Open Platform

Open Platform provides user entities with efficient application development and use capability. Open Platform provides simple and easy-to-use development environment to help user entities develop stable and secure applications quickly, which are not only available for themselves but also for a large number of other user entities as the products of the Application Center on Open Platform. As a user, user entity can integrate the third-party applications purchased from the Application Center into its Feishu Suite tenant.

Email

Email is deeply integrated with Instant Message as well as Calendar and can be shared to chat with one click. Meantime, team members can be invited to edit the email content. These functions recognize the timely synchronization of information and improve the efficiency of the email preparation. Email supports the smart sorting, which effectively saves time for managing email. In addition, it also supports the authorization of the shared Docs. Senders can grant the reading or edition rights to receivers with one click when sharing the Docs through email.

Helpdesk

Helpdesk is a “One-Stop Smart Service Platform” developed by Feishu Technology for enterprises, which combines intelligent customer service and artificial customer service to provide solutions for IT, finance, administration, human resource and other customer service scenarios to improve enterprise service efficiency and employee satisfaction. Robot can help solve simple and repetitive problems, and Helpdesk can also match artificial customer services according to the requirements. Helpdesk supports the classification and sorting of orders, which greatly improves the management efficiency, and also supports the visualization of data reports, so that enterprises can understand the operation of Helpdesk from multiple perspectives.

Knowledge Base

Knowledge base is an organization-oriented knowledge management system. Through structured precipitation of high-value information, a complete knowledge system is formed. Build a knowledge base for departments, teams or projects, all members create and manage knowledge on the same platform, easily gather team wisdom, effectively reduce the cost of knowledge transfer of the enterprise and allow information to flow freely within the enterprise.

Organization and Human Resources

Recruitment

Recruitment is a product based on millions of talent recruitment experience, helping companies to stand out in the talent competition. Its product functions include Feishu integration, recruitment process management, talent channel operation, talent pool operation, data analysis platform, and mobile recruitment. Use these products to build efficient connections between employers and candidates and accelerate the recruitment process. Recruitment uses professional and intelligent data tools and methods to help the continuous improvement of recruitment.

OKR

OKR developed by Feishu Technology integrates to Open Platform of Feishu Suite System, which could also be purchased as an independent application. Based on the theory of Objectives and Key Results, OKR facilitates objective focus, drives cooperation and improves execution efficiency. By taking advantages of OKR, users can comprehend the vision, participate in establishing and breaking down the strategies, actively seek the implementation path, align with one another, bring individuals together and go forward rapidly as an organization. OKR is an application developed based on Open Platform within Feishu Suite System, which integrated to Feishu Suite System and cannot be used independently. OKR use the account system of Feishu Suite System.

Payroll

Feishu payroll provides convenient and safe payroll management, customers can quickly complete payroll release with the help of Feishu payroll. Customer's employees can access their own payroll at any time.

Corporate Finance and Law

Contracts

Contracts cover the entire life cycle of contract drafting, review, approval, signing, filing, contract performance, and statistics, driving enterprise full-link management contracts and business. Provide more efficient, smart, and compliant contract digital solutions to help enterprises ensure compliance and better execution.

Client terminal of Feishu Suite System is currently available for Android, iOS, Mac and Windows. Unless otherwise specified, the controls involved in the report apply to all the products based on the above-mentioned operating systems.

Software and Infrastructure

Feishu Technology takes advantage of information technology system and application system to support the effective implementation of control activities related to Feishu Suite. Feishu Technology has deployed a series of management information systems to support its operation and maintenance management, including human resource management, identity authentication, access right management, development and testing management, key management, security vulnerability management, system operation monitoring, etc.

For regulating the standards and management related to software and infrastructure, Feishu Suite formulates a series of official rules and regulations as well as control process, covering identification and access management, software security development and program change management, data security and key management, security vulnerability and security incident management, system operation management, availability management, and privacy protection, etc.

Feishu Technology uses subservice organizations to provide colocation service. The Company has signed the management agreements of server room with subservice organizations, regulating requirements for server room such as access management and environment security. The Company reviews monthly inspection report of server room provided by the subservice organizations every month and carries out security inspection on the data centers each quarter, inspecting the data of equipment operation and field environment, etc. If any exceptions noted, the Company notifies the subservice organizations in a timely manner to take follow-up actions.

People

Feishu Technology has established a comprehensive organizational structure and clearly defines the roles and responsibilities assigned to different positions within the organization structure. Meantime, Feishu Technology utilizes the human resource management system to maintain employees' information on their job responsibilities, departments and superiors.

Feishu Technology has established a structured onboarding process to help new employees understand their responsibilities in information security, code of conduct and performance evaluation mechanism. Background Check is conducted by the Human Resources Department before new employees are hired, based on the importance of different roles. The whole process complies with laws and regulations formulated by the country. In addition, new hires are required to sign confidentiality agreement before onboarding and Feishu Technology clarifies employees' duties on information security in the confidentiality agreement.

Feishu Technology has established a series of information security training and learning mechanism to ensure that employees' information security awareness can meet the Company's requirements. Newly hired employees are required to participate in trainings on corporate culture, rules and regulations, information security, and mechanisms of reward and punishment. Meanwhile, the Company organizes trainings on a periodic basis, aiming at deepening employees' professional knowledge and skills and improving their information security awareness.

Procedures

Feishu Technology has designed and implemented a series of procedures in its routine operation and management in terms of security, availability, confidentiality and privacy, including but not limited to:

- Control Environment
- Information and Communication
- Risk Assessment
- Monitoring
- Product Security
- Identity and Access Management

- Change Management
- Data Security and Key Management
- Security Vulnerability and Security Incident Management
- Endpoint Security
- Capacity, Backup and Business Continuity Management
- Privacy Protection

Data and Confidentiality

Feishu Technology has established official policy to regulate the process of data security management. Meantime, Feishu Technology has established a series of controls to ensure the security and confidentiality of data transmission, storage, access and erasure process.

Feishu Suite uses pull and push mechanisms for dual protection of message data to ensure the reachability of message. Feishu Suite uses the key mechanism to support the encrypted storage of sensitive data and provides users with the data transmission channels based on security encryption policy for supporting strong encryption protocols.

Feishu Suite clearly defines data security related terms in *Feishu Privacy Policy (For OKR product, please refer to OKR Privacy Policy)*, pertaining to data retention, confidentiality, data disclosure, etc. Feishu Technology disposes corresponding data based on the requirements of data erasure and de-identification proposed by individual users and user entities.

Availability

The R&D teams analyze and plan the capacity needs of Feishu Suite on each year, generating capacity management plans, to ensure that the Company has enough resources for business development. Meanwhile, Feishu Technology has designed and implemented technical control measures and management processes to regulate the management of capacity expansion and shrinkage under the daily operation, so as to ensure the availability of server resources.

Feishu Technology has established backup strategy, backup retention strategy and backup monitoring strategy for Feishu Suite to ensure the availability of Feishu Suite.

Feishu Technology has developed business continuity management plan to provide guidelines of emergency response and recovery measures to scenarios that may lead to business disruption. The Company conducts business impact analysis and risk assessment once a year, identifying significant business processes, confirming potential business threats as well as levels of evaluation risk and developing risk response strategies.

Feishu Technology has defined the emergency planning and response process for different emergent scenarios of various products and services, generating emergency response plan. The Company organizes disaster recovery drill at least once a year for pre-defined scenarios that may lead to business disruption.

Privacy

Feishu Technology has developed *Feishu Privacy Policy (For OKR product, please refer to OKR Privacy Policy)* defining personal information and regulating the requirements of collection, usage, retention, disclosure and erasure of personal information. Meantime, Feishu Technology assesses privacy compliance at least once a year to monitor the compliance with various data protection regulations.

The Company provides users the ability to access and confirm their personal information. The Company stipulates the channels to raise objections or complaints for the users in *Feishu Privacy Policy (For OKR product, please refer to OKR Privacy Policy)*. If a user has any objections or complaints about the Company's way to handle his or her information, the user can contact the Company via email. The Company responds to user's request in a timely manner and sends the handling results to the user.

In addition, the Company has formulated official policy to regulate the classification, response and emergency handling procedure of data leakage incidents.

Attachment B.

Principal Service Commitments and System Requirements

The Company designs its processes and procedures related to the service systems to meet its service commitments and system requirements for Feishu Suite. Those service commitments and system requirements are based on the service commitments that the Company makes to its user entities, and the operational, and compliance requirements that the Company has established for the services.

The Company has established communication channels according to the Company's policies and procedures, to ensure that the service commitments are effectively communicated to user entities. The Company has described its service commitments of its Feishu Suite System related to security, availability, confidentiality and privacy by publishing *Feishu User Terms of Service*, and *Feishu Privacy Policy (For OKR product, please refer to OKR User Terms of Service and OKR Privacy Policy)*

The Company identifies the following objectives to support the security, availability, confidentiality and privacy commitments underlying their service commitments and system requirements. The objectives ensure the system operates and mitigates the risks that threaten the achievement of the service commitments and system requirements. The objectives include but not limited to:

- Integrating the security, availability, confidentiality and privacy principles into product design, and providing related functions to meet the user entities' requirements on security, availability, confidentiality and privacy;
- Applying secured change management processes;
- Applying management controls, operation controls and technological controls to protect business data and confidential information to guarantee the sustainable operation of business and application systems;
- Deploying encryption technologies to protect business data and confidential information at rest and in transit;
- Establishing corresponding service cycles and service availability commitments for Feishu Suite to ensure the high availability of user entities' business and systems;
- Monitoring and periodically auditing the design and operating of controls within the system; and
- Applying management controls, operation controls and technological controls to ensure the compliance and security for personal information's collection, usage, retention, disclosure and disposal.

The Company establishes operational requirements that support the achievement of security, availability, confidentiality and privacy commitments and other system requirements. Such requirements are communicated in the Company's system policies and procedures and system design documentation. Information security policies define

an organization-wide approach about how systems and data are protected. These include policies around how the internal control system is operated, how the internal application systems and networks are managed and how employees are hired and trained. In addition to these policies, standard operating procedures have been developed and documented on how to carry out specific manual and automated processes required in the development and operation of the service systems.

北京飞书科技有限公司

体系和组织控制 3 (SOC 3) 报告

飞书套件体系与安全性、可用性、保密性和隐私性相关的报告

2020 年 12 月 1 日至 2021 年 5 月 31 日期间

本报告以英文版形式出具，中文翻译版仅作为参考。如有任何差异，以英文版报告为准。

北京飞书科技有限公司管理层认定

我们负责在 2020 年 12 月 1 日至 2021 年 5 月 31 日期间针对北京飞书科技有限公司（飞书科技）的飞书套件体系（体系）设计、实施、运行和维护有效的内部控制，从而为实现与安全性、可用性、保密性和隐私性相关的北京飞书科技有限公司服务承诺和体系需求提供合理保证。我们对该体系范围的描述列示于附件 A，该描述明确了我们的认定所涵盖的体系方面。

我们已根据 TSP 第 100 条“针对安全性、可用性、过程完整性、保密性和隐私性的 2017 版信托服务标准”（美国注册会计师协会（AICPA），信托服务标准）中所列示的与安全性、可用性、保密性和隐私性相关的信托服务标准（适用信托服务标准），对 2020 年 12 月 1 日至 2021 年 5 月 31 日期间体系内部控制的有效性进行了评估，从而为实现北京飞书科技有限公司的服务承诺和体系需求提供合理保证。在应用适用信托服务标准时，与适用信托服务标准相关的北京飞书科技有限公司的服务承诺和体系需求可反映其体系目标。附件 B 列示了与适用信托服务标准相关的主要服务承诺和体系需求。

任何体系的内部控制均存在固有限制，包括可能存在的人为失误及控制规避等。鉴于该等固有限制，服务机构可获取合理保证（而非绝对保证），确保实现其服务承诺和体系需求。

我们认为，根据适用信托服务标准，体系内部控制在 2020 年 12 月 1 日至 2021 年 5 月 31 日期间有效运行，可为北京飞书科技有限公司实现其服务承诺和体系需求提供合理保证。

北京飞书科技有限公司
2021 年 7 月 30 日

独立服务审计师报告（翻译自英文版本）

致：北京飞书科技有限公司

范围

我们检查了北京飞书科技有限公司（“飞书科技”）所附标题为“北京飞书科技有限公司管理层认定”的认定（“认定”），即北京飞书科技有限公司飞书套件体系（“体系”）的内部控制在2020年12月1日至2021年5月31日期间有效运行，可合理保证北京飞书科技有限公司已根据TSP第100条“针对安全性、可用性、过程完整性、保密性和隐私性的2017版信托服务标准”（美国注册会计师协会，信托服务标准）中所列示的与安全性、可用性、保密性和隐私性相关的信托服务标准（适用的信托服务标准）实现其服务承诺和体系需求。

服务机构的责任

北京飞书科技有限公司有责任实现其服务承诺和体系需求，并负责设计、实施和运行有效的体系内部控制，从而为实现其服务承诺和体系需求提供合理保证。北京飞书科技有限公司还提供了对体系内部控制有效性的附带认定。在准备其认定的过程中，北京飞书科技有限公司负责在其认定中选择与确定适用的信托服务标准，并通过评估体系内部控制的有效性为其认定提供合理依据。

服务审计师的责任

我们的责任是，基于我们的检查，就管理层的认定（即体系内部控制在整个期间有效运行，可合理保证服务机构已根据适用的信托服务标准实现其服务承诺和体系需求）发表意见。我们已按照美国注册会计师协会制定的鉴证准则执行检查。该等准则要求我们计划并执行检查，以就管理层的认定是否在所有重大方面进行公允陈述获取合理保证。我们认为，我们获取的证据是充分和适当的，为发表意见提供了合理基础。

我们的检查包括：

- 了解该体系与服务机构的服务承诺和体系需求
- 根据适用的信托服务标准，评估控制未能有效实现北京飞书科技有限公司的服务承诺和体系需求的风险
- 根据适用的信托服务标准，实施程序以获取有关体系内部控制能否有效实现北京飞书科技有限公司的服务承诺和体系需求的证据

我们的检查还包括在该等情况下实施我们认为必要的其他程序。

固有限制

任何内部控制体系的有效性均存在固有限制，包括可能存在的人为失误及控制规避等。



由于其性质，这些控制并非总能根据适用的信托服务标准有效运行，从而为实现服务机构的服务承诺和体系需求提供合理保证。此外，根据控制有效性的任何结论来推断未来期间的状况，将面临控制可能因条件变化或遵守政策或程序的程度降低而变得不够充分的风险。

意见

我们认为，管理层的认定（即北京飞书科技有限公司的飞书套件体系内部控制在 2020 年 12 月 1 日至 2021 年 5 月 31 日期间有效运行，可合理保证北京飞书科技有限公司已根据适用的信托服务标准实现其服务承诺和体系需求）在所有重大方面进行了公允陈述。

其他事项

此版本报告是基于原始版本（以英文版出具）的译文。在所有关于信息、观点或意见的解释中，如有任何差异，以原始英文版报告为准。

普华永道中天会计师事务所（特殊普通合伙）
上海，中国
2021 年 7 月 30 日

附件 A.

北京飞书科技有限公司关于飞书套件体系的描述

I、组织概况

公司简介

北京飞书科技有限公司（以下简称“飞书科技”或“公司”）创立于 2016 年，飞书科技以 SaaS（Software-as-a-Service，软件即服务）云服务为核心，致力于开发并提供安全、稳定、可靠的云端办公套件解决方案，旨在赋能企业改变办公方式，为企业提供云端办公套件服务。

服务与系统

飞书科技的飞书套件体系为企业提供协同办公、组织与人力、企业财法的 SaaS 云服务，以“移动友好、实时协作、统一入口”为特点，帮助企业提升工作效率，降低生产成本和管理成本，开启向更高效、更协同、更安全的智能化公司转变。

II、说明涵盖的服务和数据中心

本报告涵盖的服务范围包括：

- | | |
|--------|-------|
| • 即时消息 | • 服务台 |
| • 日历 | • 邮箱 |
| • 视频会议 | • OKR |
| • 云文档 | • 工资单 |
| • 知识库 | • 招聘 |
| • 云盘 | • 合同 |
| • 开放平台 | |

以及支持服务的三个数据中心，分别位于河北怀来、山西灵丘和河北廊坊。上述数据中心分别由河北秦淮数据有限公司、北京秦淮数据有限公司和中国电信股份有限公司北京电信分公司（以下简称“子服务机构”）运营，提供主机托管服务。报告中不包括子服务组织的内部控制（如物理访问和物理环境安全等）。

III、本系统说明涵盖的服务

协同办公

即时消息

即时消息通过即时通讯技术实现在线交流，传递文字讯息、文件及图片，支持语音与视频交流。消息记录存储在云端，并会自动同步到所有设备。新成员加入群组时可随时随地查看全部历史消息，快速融入团队和项目，降低沟通成本，提升上手效率。

云文档

云文档支持多用户在线协作编辑文档，文档格式包括 Word、Excel 和 Mind Notes。多用户可同时协作编辑同一文档，文档亦可被设置为私密或共享两种属性，文档默认无法分享至租户外，除非租户设置为可分享。文档中支持插入文本、图片、表格、文件、视频、任务列表等多种类型的内容，不仅仅是文档，更是丰富的创作和互动工具。

云盘

云盘支持多格式文件的高速上传、下载及预览，所有工作文档都集中存储在云端，打造企业知识库。用户无需在本地保存，服务支持随时追溯或还原历史记录，并通过电脑、手机、平板电脑等设备随时随地查看、编辑、共享和协作，让知识资源得到充分利用。

日历

日历帮助企业 and 用户可以协调和规划人员、会议室及其他资源以达到日程管理的智能化协同。日历支持创建日程、邀请会议、一键创建会议群组、共享日程、订阅他人日程及创建公共日历等功能，与即时消息、云文档深度整合，团队成员可以便捷规划和共享日程，时刻保持同步，组织会议、项目排期更高效。

视频会议

视频会议与即时消息和日历深度整合，在群聊或日历的会议邀约中即可轻松开启音视频会议，还可以一键发起万人会议直播、便捷共享屏幕或文档，远程协同如临现场。视频会议中主持人可以实时录制会议音频及视频。录制内容将会自动保存在云端，方便后续回顾。

开放平台

开放平台向企业提供高效的应用程序开发和使用能力。开放平台提供简单易用的开发环境，帮助企业快速开发稳定安全的应用。企业开发的应用可供企业内部使用，亦可上架至飞书开放平台应用商店中供海量企业用户使用。作为使用者，企业可直接将应用商店中提供的第三方应用集成至其所使用的飞书套件体系租户中。

邮箱

电子邮件与即时消息和日历深度集成，邮件可一键分享至沟通群组，还可以邀请团队成员协同撰写内容，信息同步更及时、邮件准备更高效。邮箱支持邮件智能分类，可有效节省邮件处理时间。邮件还可实现分享文档的灵活授权，通过邮件分享文档时，发件人可一键开放阅读或编辑权给收件人。

服务台

服务台是飞书科技为企业开发的“一站式智能服务平台”。服务台结合智能客服与人工客服，为 IT、财务、行政和人事等多种客服场景提供智能解决方案，提升企业服务效率和员工满意度。通过服务台，机器人可帮助解决简单、重复性的问题，服务台也可根据问题匹配技能客服。服务台支持工单的分类整理，极大地提升了管理效率，同时支持数据报告的可视化，使企业可多维度了解服务台运营情况。

知识库

知识库是一个面向组织的知识管理系统。通过高价值信息的结构化沉淀，形成完整的知识体系。为部门、团队或项目构建知识库，所有成员在同一平台上创建和管理知识，轻松汇聚团队智慧，有效降低企业知识转移成本，让信息在企业内部自由流动。

组织与人力

招聘

飞书招聘是基于百万人才招聘经验的产品，帮助企业在人才竞争中脱颖而出。产品功能包括飞书整合、招聘流程管理、人才渠道运营、人才库运营、数据分析平台、移动招聘等。使用这些产品在雇主和候选人之间建立有效的联系并加快招聘流程。飞书招聘使用专业、智能化的数据工具和方法，助力招聘的持续改进。

OKR

飞书科技开发的 OKR 集成到飞书套件体系开放平台，也可以作为独立应用购买。OKR 是飞书科技开发的一款基于目标与关键结果法理论，促进目标聚焦、推动合作、提高执行效率的工具。通过 OKR，用户可以理解愿景，参与战略和策略的制定分解，主动寻找实现路径，互相对齐，把个体结合到一起，形成组织并快速前进。OKR 为基于飞书套件体系中的开放平台开发的应用程序，集成至飞书套件体系中，无独立应用，并使用飞书套件体系的账号体系。

工资单

飞书工资单提供方便、安全的工资单管理，客户可以在飞书工资单的帮助下快速完成工资单发布。客户的员工可以随时访问自己的工资单。

企业财法

合同

飞书合同涵盖合同起草、审查、审批、签订、备案、合同履行、统计的全生命周期，带动企业全链路管理合同和业务。提供更高效、智能、合规的合同数字化解决方案，帮助企业确保合规性和更好的执行。

飞书套件体系客户端目前支持 Android、iOS、Mac 和 Windows。除非另有说明，本报告所涉及的控制适用于所有基于上述操作系统的产品。

软件与基础设施

飞书科技使用信息技术和应用系统以支持与飞书套件体系相关的控制活动的有效开展。飞书科技部署了一系列管理类信息系统支持其运营和运维管理，包括人力资源管理、身份认证、权限管理、开发及测试管理、密钥管理、安全漏洞管理、系统运维监控等。

飞书科技制定了一系列正式的规章制度和控制流程，以规范软件与基础设施相关的规范和管理要求，涵盖身份识别与访问管理、软件安全开发和程序变更管理、数据安全和密钥管理、安全漏洞与安全事件管理、系统运维管理、可用性管理、隐私保护等。

飞书科技使用子服务机构所提供的主机托管服务。飞书科技与子服务机构签订了机房管理协议，其中规定了机房访问管理、机房环境安全等要求。飞书科技每月审阅子服务机构提供的机房巡检月报，并且每季度进行一次数据中心巡检，检查设备运行数据和现场环境数据等，若发现异常，飞书科技及时告知子服务机构进行跟进处理。

人员

飞书科技建立了全面的组织架构并清晰地定义了组织架构中不同岗位与角色的职责分配，同时使用人力资源系统维护员工的岗位职责、所属部门及其上级负责人信息。

飞书科技建立了有序的人员入职流程，以帮助新员工了解其在信息安全方面的义务、员工行为准则以及绩效考核机制。新员工录用前，人力资源部会根据岗位的重要性，并在国家法律法规允许的情况下对员工进行背景调查，确保该员工的录用符合公司的各项规章制度。此外，新员工在入职前须签署保密协议，飞书科技在保密协议中明确了员工在信息安全方面所应承担的责任和义务。

飞书科技为确保员工的信息安全意识能够符合公司要求建立了一系列的信息安全培训及学习机制。新员工入职后均须参加包括公司文化、规章制度、信息安全以及奖惩机制等内容的培训。此外飞书科技会不定期针对员工的专业知识技能和信息安全意识组织培训。

流程

飞书科技在日常运营及管理过程中已设计并实施了一系列与安全性、可用性、保密性以及隐私性相关的流程，包括但不限于：

- 控制环境
- 信息与沟通
- 风险评估
- 监控
- 产品安全
- 身份和访问管理
- 变更管理
- 数据安全和密钥管理
- 安全漏洞和安全事件管理
- 个人终端安全
- 容量、数据备份及业务连续性管理
- 隐私保护

数据与保密性

飞书科技制定了正式的制度和规定，以规范数据安全流程。同时，飞书科技建立了一系列控制以确保数据传输、存储、访问及销毁流程的安全性与保密性。

飞书套件体系使用拉取机制和推送机制对消息数据进行双向保护，以保证消息数据的可达性。飞书套件体系使用密钥机制对敏感数据进行加密存储，提供并支持基于安全加密协议的通信信道进行数据传输。

飞书科技在《飞书隐私政策》（OKR 产品请参考《OKR 隐私政策》）中明确规定了数据安全相关内容，包括数据保留条款、保密条款和数据披露条款等。飞书科技根据个人用户或用户机构提出的数据销毁及去标识化要求处理对应数据。

可用性

飞书科技每年进行容量需求规划与分析，并形成资源估算方案，以保障飞书科技有足够的资源以供业务发展。同时，飞书科技设计并实施了技术管控措施和管理流程，对日常运维场景下的扩容和缩容管理进行了规范，以保障服务器资源的可用性。

飞书科技针对飞书套件体系设置了数据备份、备份保存及备份监控策略，以确保飞书套件体系的可用性。

飞书科技制定了业务连续性计划，针对可能导致业务中断的场景制定了应急响应和恢复措施。飞书科技每年执行一次业务影响分析和风险评估，识别重要业务流程、确认潜在业务威胁、评估风险等级及制定风险应对策略。

飞书科技针对飞书套件体系可能涉及的不同突发场景、应急响应工作流程进行了定义，形成应急响应预案。飞书科技每年对可能导致业务中断的情况执行一次灾备演练。

隐私性

飞书科技设计制定了《飞书隐私政策》（OKR 产品请参考《OKR 隐私政策》），对个人信息进行了明确定义，对个人信息的收集、使用、存储、公开披露和处置进行了约定，并且至少每年对隐私合规性进行一次评估以监督公司是否遵守各类数据保护法规的规定。

飞书科技赋予用户访问和确认个人信息的权利。飞书科技在《飞书隐私政策》（OKR 产品请参考《OKR 隐私政策》）中告知用户提出异议或投诉渠道。若用户对公司处理个人信息的方式提出异议或作出投诉，以邮件的形式联系飞书科技。飞书科技将及时响应用户的请求，并将处理结果反馈至用户。

同时，飞书科技制定了正式的制度和规定，以规范数据泄露事件的定级、响应和应急处置流程等。

附件B.

主要服务承诺及体系要求

飞书科技为实现飞书套件体系的服务承诺和体系要求而设计了与上述服务系统相关的流程以及程序。该等服务承诺和体系要求系基于飞书科技向用户机构所承诺的服务以及公司对该服务所作出的运营以及合规要求而得出。

飞书科技按照政策和规程，建立信息沟通渠道，确保服务承诺有效传达至用户机构。飞书科技在《飞书用户服务条款》和《飞书隐私政策》（OKR 产品请参考《OKR 用户服务条款》和《OKR 隐私政策》）文档中描述了飞书套件体系与安全性、可用性、保密性及隐私性相关的服务承诺。

飞书科技建立了下列目标以实现与安全性、可用性、保密性及隐私性相关的承诺以及其他体系要求。这些目标确保了体系的运营，同时减轻了可能对实现服务承诺和体系要求造成威胁的风险，包括但不限于：

- 在产品设计中融入安全性、可用性、保密性及隐私性原则，以及提供可满足用户机构安全性、可用性、保密性及隐私性相关要求的功能；
- 采用安全的变更管理流程；
- 运用管理控制、运营控制以及技术控制等方法以保护业务数据和机密信息，并保障业务及系统的可持续运行；
- 运用加密技术以在数据存储和传输过程中保护业务数据和机密信息；
- 针对飞书套件体系制定了相应的服务周期及服务可用性承诺，以保障用户机构业务及系统的高可用；
- 对体系内控制的设计与执行情况进行监控和定期审计；及
- 运用管理控制、运营控制以及技术控制等方法以确保个人信息的收集、使用、保留、披露和处理的合规性及安全性。

飞书科技建立了运营规范，以实现安全性、可用性、保密性及隐私性相关的承诺以及其他体系要求。该等要求通过公司的体系制度及流程、系统设计文档等进行传达。飞书科技在各类信息安全制度中对全公司范围内的系统及数据的保护方法进行了定义。该等制度对包括内部控制体系的运作方法、内部应用系统及网络的管理方法以及员工的雇佣、培训方法等进行了规定。此外，飞书科技亦对上述服务系统的运营与开发中涉及的人工及自动流程之标准操作步骤进行了规定。