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Nulab Security Whitepaper

Ver 1.8

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Nulab Inc.

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1. Separation of Responsibilities

Responsibilities of Nulab Inc. ("us", "we" or "Nulab")

We will implement the following security measures.

- Security measures for the services provided by us (Backlog, Cacoo, Typetalk, Nulab Apps Management Screen (*1), Nulab Pass)
- Protection of user data stored in the above services
- Middleware, OS and other infrastructural security that is required for the provision of the above services

*1
Nulab Apps Management Screen is the shared account ("Nulab Account") etc. functionality provided by Nulab.

Responsibilities of the user

The user shall be responsible for implementing the following security measures.

- Proper management of password (Including the management of devices used for two factor authentication)
- Proper Account (*2) management (Grant of authorities for registration, deletion, administration etc)
- Proper management of registered contents

*2
Hereinafter, account might be referred to as user, however that should be all a reference to the account.

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2. Location of Data Storage

All data received by our customers is stored in the data centers of the cloud vendors outlined below.

Name of Service	Location of Data Storage
Nulab Apps Management Screen	AWS (USA (Oregon))
Backlog	AWS (Japan (Tokyo)) * In case of application from the Japanese website AWS (USA (Oregon, Virginia)) * In case of application from the English website
Cacoo	AWS (USA (California))
Typetalk	AWS (USA (Oregon))
Nulab Pass	AWS (USA (Oregon)) * Data other than audit log AWS (Japan (Tokyo)) * Only audit log data

3. Deletion

If the Administrator follows the steps set forth by Nulab to terminate the use of the services ("Service Termination Request"*1), we will delete the data received by the users ("User Data").
Also, if a trial period ends without a submission of a request for a Paid plan, or if the Services are terminated for reasons such as delayed payments, the User Data will be deleted.
In this case, upon completion of the deletion, the User Data cannot be retrieved even by Nulab.
Conditions for deletion, timing of deletion and the User Data subject to deletion are set forth in the table below.

*1
"Service Termination Request" means the below action.
- "Delete organization" in Nulab Account

Conditions and timing of deletion

	Conditions for deletion of User Data	Timing of deletion (General rule)

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Backlog Classic Plan	Termination request has been submitted	The deletion of User Data process will start after 180 days have elapsed following (i) the termination of the current agreement for Spaces under paid plans; or (ii) the submission of a termination request for Spaces during paid plan trial periods or under free plans, and will be complete within 10 days of start*.
	The trial period is ended without a request for formal paid plans	The deletion of the Organization will be automatically implemented after 30 days from the end date of the trial period. The deletion of User Data process will start after 180 days following the implementation of deletion of the Organization and will be complete within 10 days of start*.
	The Services are terminated due to payment delay or any other reasons pursuant to the Article 9.1 of Nulab Terms of Service	The deletion of the Organizations will be automatically implemented after 90 days of the termination of the Services. The deletion of User Data process will start after 180 days following the implementation of termination and will be completed within 10 days of start*.
Cacoo Plus Plan, and Free Plan subscribed prior to November 27, 2019.	Deletion of Nulab Account	The deletion of User Data process will start upon deletion of the Nulab account and will be completed within 10 days of start*.
Backlog, Cacoo and Typetalk plans other than above	Deletion of Organization	The deletion of User Data process will start after 180 days following the implementation of deletion of the Organization and will be completed within 10 days of start*.
	The trial period is ended without a request for formal paid plans	The deletion of the Organization will be automatically implemented after 30 days from the end date of the trial period.

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		The deletion of User Data process will start after 180 days following the implementation of deletion of the Organization and will be complete within 10 days of start*.
	The Services are terminated due to payment delay or any other reasons pursuant to the Article 9.1 of Nulab Terms of Service	The termination of the Organization will be automatically implemented after 90 days have passed from the suspension of the Services. The deletion of User Data process will start after 180 days following the implementation of deletion of the Organization and will be complete within 10 days of start*.
Nulab Account	Deletion of Nulab Account	The deletion of User Data process will start upon deletion of the Nulab account and will be complete within 10 days of start*.
Managed Account	Deletion of Organization or Managed Account	In case the deletion of the Organization is implemented; the deletion of User Data process will start after 180 days following the implementation of deletion of the Organization and will be complete within 10 days of start*. In case the deletion of the Managed Account is implemented; the deletion of User Data process starts upon the deletion and will be complete within 10 days of start*.
	The trial period is ended without a request for formal paid plans	The deletion of the Organization will be automatically implemented after 30 days from the end date of the trial period. The deletion of User Data process will start after 180 days following the implementation of deletion of the Organization and

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		will be complete within 10 days of start*.
	The Services are terminated due to payment delay and any other reasons pursuant to the Article 9.1 of Nulab Terms of Service	The deletion of the Organization will be automatically implemented after 90 days from the termination of the Services. The deletion of User Data process will start after 180 days following the implementation of deletion of the Organization and will be complete within 10 days of start*.
Audit Log	Deletion of Organization	The deletion of the audit log process will start after 180 days following the implementation of deletion of the Organization and will be complete within 10 days from the start*.
	The contract period for Nulab Pass has expired	The deletion of the audit log process will start after 30 days following the expiration of the Nulab Pass contract and will be complete within 10 days from the start*.
	The trial period for Nulab Pass has ended without a request for formal paid plans	The deletion of the audit log process will start after 30 days following the expiration of the Nulab Pass trial term and will be complete within 10 days from the start*.
	The Services are terminated due to payment delay or any other reasons pursuant to the Article 9.1 of Nulab Terms of Service	The deletion of the audit log process will start after 30 days following the expiration of the Nulab Pass trial period and will be complete within 10 days from the start*.
	13 months the audit log retention period has passed	The deletion process of the audit log will start after 400 days following the retention of the audit log, and will be completed within 10 days from the start*.

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※ Notwithstanding the above, User Data will remain stored in the backup data collected for each service for a certain period even after the deletion completion dates listed above. For example, if the data's backups are made once a day and retained 30 times, the data will remain stored for 30 days in the data's backups after deletion is complete and will be deleted on the 31st day.

User Data Exempted from Deletion

All User Data registered by Users for each Service shall be deleted except for the following data:

- Data related to contracts, billing and deposit for each service
- Administrator's name and contact for each service
- Backlog space owner's name and contact (Classic Plan)
- Backlog space ID
- Nulab Pass' [Nulab Organization ID](#)
- Image inserts uploaded to Cacoo

However, in case of the deletion of the Nulab account, Managed Account or Backlog account(Classic Plan), the User Data in Backlog, Typetalk or Cacoo (excluding Free Plan and Plus Plan prior to November 27, 2019), created through the respective accounts, will not be deleted .
In order for these User Data to be deleted, it must fall into one of the items listed above other than "Nulab Account" or "Managed Account".

4. Labeling Function

For All Services

Teams (excluding Backlog Classic Plan)

Users can organize the Nulab accounts into teams.

- Team List and New Team Creation ([Manual](#))

Backlog

Projects

Users can organize the accounts into projects, set up by the User.

- Add project ([Manual](#))

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- Add users ([Manual](#))
- Project Settings ([Manual](#))

Tags

Users can add tags to the Wiki pages and thereby making them searchable.

- Tag Function ([Manual](#))

Categories Function

Users can create categories and order their issues into such categories within a project.

- How to set Categories ([Manual](#))

Version Control/ Milestone Function

Users can organize their issues by version or milestones within a project.

- Version Control/ Set a Milestone ([Manual](#))

Team Function (Backlog Classic Plan only)

Users can set up teams and group accounts into such teams.

- Team Settings ([Manual](#))

Cacoo

Folders

Users can organize their canvases by folders.

- How to share canvases, stencils, templates in a folder ([Manual](#))

Typetalk

Topics

Users can set up topics to discuss about a specific thema

- Create a topic ([Manual](#))
- Edit a topic ([Manual](#))

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- Archive and delete a topic ([Manual](#))

Topic Groups

Users can organize topics into topic groups

- How to manage topic groups ([Manual](#))

Message Tagging

Users can add tags to the messages within a topic.

- Tagging ([Manual](#))

Pin Topics

Users can pin their selected topics to the top of the topics list.

- How to pin topics ([Manual](#))

5. Adding and Deleting Users

For All Services (Excluding Backlog Classic)

User Registration

Customers can create a Nulab account through sign up (*1) or when they are invited to an organization. Accounts created through sign up will be administrators and they can perform the following organization management functions, such as "Invite to an organization" etc.

- Create a Nulab Account ([Manual](#))
- Sign up for a Free trial of Backlog ([Choose Plan](#))
- Sign up for a Free trial of Cacoo ([Choose Plan](#))
- Sign up for a Free trial of Typetalk ([Choose Plan](#))
- Sign up for a Free trial of Nulab Pass ([Trial Page](#))

*1
Sign up refers to the use the Services through a free trial, or to the creation of a Nulab Account from the Sig Up option.

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Delete Users

Users can always opt to delete their Nulab Account.
Only the users themselves can delete their Nulab Account.

- Delete Nulab Account ([Manual](#))

Invite to an Organization

Users with the authority to invite others can always invite other users to their organization.

- Invite Users ([Manual](#))

Remove from an Organization

Administrators can remove users from their organizations. By removing a user, such removed user will be unable to use the services used by the organization.

Backlog (Classic Plan)

Backlog (Classic Plan), can be used with a Nulab Account or by creating a Backlog-only user. Authorized users, within the scope of their contract plan, can add or remove users.

- Add, Manage, Delete Users ([Manual](#))

Nulab Pass

Through Nulab Pass, customers can create Managed accounts that are using an IdP (Identity Provider) and can be used with Single-Sign On (SSO).
The administrator can register or remove managed accounts.
Based on the selected plan, audit logs can be recorded and saved.

- Create, Manage, Delete Managed Accounts ([Manual](#))
- Set SAML Authentication (SSO) ([Manual](#))
- Changing an account type ([Manual](#))
- Audit log settings and file ([Manual](#))

6. Access Rights Management

For All Services (Except Backlog Classic)

Users can set the access rights of a Nulab Account or a Team within an organization.

There are 3 types of authorities: administrator, general user and guest.
Also, general users can have the additional authorization to invite members.

- User Authorities (Manual)
- Invite Members to an Organization (Manual)
- Add Invitation Authority to General Users (Manual)

Backlog

Users can set access rights to projects and the information within the projects.

- User Authorities (Manual)
- Add, Manage and Delete Users (Manual)
- Edit Project Participants, Project Manager Settings (Manual)
- Add, Change and Delete Teams (Manual)

Backlog (Classic Plan)

Backlog (Classic Plan) has an account and team management function.

- Add, Manage and Delete Users (Manual)

Cacoo

Users can set authorities for the folders within an organization.
There are 3 types of authorities, "Viewer", "Editor" and "Owner".
The administrator of an organization can authorize certain members of the organization to use Cacoo.

- Manage Access to Folders (Manual)
- Manage Active Users (Manual)

Typetalk

Depending on the organization authorities set by the user, different authorities can be set for the topics within Typetalk.
Administrators can authorize certain members of an organization to use Typetalk and to participate in topics.

- Member Authorities (Manual)
- Management of Topic Participants (Manual)
- Management of Organization Members (Manual)

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Nulab Pass

Users can set up access rights to the recorded and saved audit logs.
- Audit log authorities ([Manual](#))

7. How to Set Password

Nulab Account

Initial Password

Users can set their own password when they create their Nulab Account.

How to Change Password

- Password Management ([Manual](#))

Backlog (Classic Plan)

For Backlog (Classic Plan), a password is automatically issued when the space administrator creates a new user.

Initial Password

When the administrator creates a new account, the initial password is generated and sent to the email address of the new account.

How to Change Password

- Change Password([Manual](#))

Nulab Pass

The login ID and the password to a Nulab Pass managed account is the login ID and the password set by the Customer on their IdP (Identity Provider).
Password information is not stored in Nulab Pass.

- Login with SAML Authentication (SSO) ([Manual](#))

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8. Encryption

User Information

- Each user information (such as name, email address) stored in databases are not encrypted but access rights are appropriately limited.
- Passwords are stored in an irreversible encrypted (hashed) state.

Correspondence with the Services

- Correspondence between Customer's terminal and the services provided by us are encrypted by SSL.

Database Encryption

- Database file are encrypted for the following services.
  Target service: Cacoo, Typetalk

9. Manage Changes Management to the Services

Information about service changes that affect users and maintenance that involves service outages can be found at the link below. In addition, if there is a significant impact, we will also notify you on each service's dashboard and via newsletters.

- Product Updates ([Japanese](#))
- Backlog Announcements ([Japanese](#) / [English](#))
- Backlog Maintenance Information ([Japanese](#) / [English](#))
- Backlog New Release ([Japanese](#) / [English](#))
- Cacoo New Release ([Japanese](#) / [English](#))
- Typetalk New Release ([Japanese](#) / [English](#))
- Backlog Official Twitter ([Japanese](#) / [English](#))
- Cacoo Official Twitter ([Japanese](#) / [English](#))
- Typetalk Official Twitter ([Japanese](#) / [English](#))

10. Manuals

Various manuals for users can be accessed from the links below.

- Nulab Apps Management App User Guide ([Japanese](#) / [English](#))
- Backlog Tutorial ([Japanese](#) / [English](#))
- Cacoo Support ([Japanese](#) / [English](#))

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- Typetalk Support ([Japanese](#) / [English](#))
- Nulab Pass Support ([Japanese](#) / [English](#))

11. Backup

For all Nulab Services

- Nulab is using the Snapshot function provided by AWS for the backup.
- Backup data is stored in high-availability and high-durability storage in AWS.
- The backup data is for the purpose of restoring the entire service, individual customer data cannot be restored individually.
- The region for the backup data is the same as the region specified in "2. Location of Data Storage".

Nulab Apps Management Screen / Nulab Pass

- The scope, frequency and retention period of backups performed by Nulab are as follows.
    - Database (users, group etc): Saved once a day and retain 14 savings
- The above is described in our [Supplemental Terms regarding Security](#) as well.

Backlog

- The scope, frequency and retention period of backups performed by Nulab are as follows.
    - Database (issues, wiki etc.): Saved once a day and retain 30 savings.
    - Shared files, Git, Subversion: Saved twice a day and retain 60 savings.
- The above content is also described in our [Recovery actions during server outage](#) as well.

Cacoo

- The scope, frequency and retention period of backups performed by Nulab are as follows.
    - Database (figures, templates saved by user etc) : Saved once a day and retain 14 savings..
    - Picture files used for figures: Since they are stored in highly available and highly durable storage, it is considered that there is almost no risk of loss, so they are excluded from backup.
- The above content is described in our [Security, privacy and outage policies](#).

Typetalk

- The scope, frequency and retention period of backups performed by Nulab are as follows.

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- ○ Database (topics, messages, etc): Saved once a day and retain 14 savings.
- ○ Attached files: Since they are stored in highly available and highly durable storage, it is considered that there is almost no risk of loss, so they are excluded from backup.
- The above content is described in our [Security, privacy and outage policies](#) as well.

12. Time zone information for logs

- Logs within the services provided by Nulab are taken in GMT(UTC+0) or JST(UTC+9), which is the server time.
- Log times are synchronized with the NTP service provided by AWS.

13. Information for Vulnerability Management

- The services we provide are periodically assessed for vulnerabilities by a third party once a year. We examine the contents of any identified issues and take necessary actions.
- The development team of our services regularly collects vulnerability information related to the OS, middleware, etc. used for the provision of the services.
- If a vulnerability patch for a component used in our services is released, we will promptly apply it after verification in our test environment.

14. Secure Development Life Cycle

- Through carrying out code reviews, etc., we check whether basic vulnerabilities have been addressed.
- We check the libraries installed on the server for outdated versions, vulnerabilities, etc.

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15. Incident Response

- In the event a security incident (as defined by us) occurs, we will contact the user's administrator by e-mail or by one or more other means based on our choice.
- Details of the above content are described in our Supplementary Terms regarding Security.
- For inquiries relating to information security incidents reach us from the inquiry page below.
  - Inquiry Page: https://nulab.com/contact/

16. Protection and Third Party Provision of User Data

- It is our responsibility to protect the data entrusted to us by the users.
- User data, including log data, is stored under access rights that are set so that only a limited number of people in each service development team can access it, in order to prevent unauthorized access and falsification.
- However, if we are legally obligated to provide user data, in a legally recognized form, such as by an order from a competent court to submit as evidence, Nulab will provide such user data without the user's permission, to the minimum extent necessary.

17. Governing Law

- The agreement between us and the users is governed by the laws of Japan.

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18. Authentication

- We have acquired ISMS certification in the ISMS conformity assessment system operated by the Information Management System Accreditation Center (ISMS-AC). (*1)
- We have acquired ISMS cloud security certification in the ISMS conformity assessment system operated by the Information Management System Accreditation Center (ISMS-AC). (*2)

【Scope of ISMS Cloud Security Certification Registration】

Service Provider for the cloud services of Backlog, Cacoo, Typetalk, Nulab Apps for system development, operation and maintenance, and ISMS cloud security management system for use as a cloud service customer for Amazon Web Services.

*1 https://isms.jp/lst/ind/CR_IS_x0020_656556.html
*2 https://isms.jp/isms-cls/lst/ind/CR_CLOUD_x0020_681700.html

19. Use of Third-Party Service Providers

The Services provided by Nulab use the following external cloud services for the provision of the listed functionalities. The content of this Security White Paper does not extend to the scope managed by the cloud services shown below, and we do not guarantee compliance with the content to that extent.

Cloud Service	Function	Provider
Amazon Web Service	Infrastructure Construction and Operation	Amazon Web Services, Inc.
Google Cloud Platform	Infrastructure Construction and Operation	Google LLC
PagerDuty	Infrastructure Operation	PagerDuty, Inc.
mackerel	Infrastructure Operation	KK. Hatena
Intercom	Customer Support	Intercom, Inc.
GoToMeeting	Customer Support	LogMeIn, Inc.
Google Workspace	Customer Support	Google LLC
Zendesk	Customer Support	Zendesk, Inc.

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Stripe	Payment	Stripe, Inc.
PAY.JP	Payment	PAY, Inc.
PayPal	Payment	PayPal Holdings Inc.
MaxMind	Geo location Database	MaxMind, Inc.
Twilio	SMS Transmission	Twilio Inc.
Mixpanel	Email Transmission	Mixpanel, Inc.
Mailchimp	Email Transmission	The Rocket Science Group, LLC
SendGrid	Email Transmission	SendGrid, Inc.
Marketo	Email Transmission	Adobe Inc.
Salesforce	Customer Management	Salesforce.com Co.,Ltd.

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Revision History

Version	Date of Revision	Content of Revision
1.0	25 Feb 2019	Original Version Issued
1.1	14 Jun 2019	11.Change of Backup Conditions for Backlog 19.Changes to services subject to exemption
1.2	9 Oct 2019	3. Change in data deletion
1.3	6 Dec 2019	19.Changes to services subject to deletion
1.4	19 Jul 2021	1. Separation of Responsibilities 2.Change of Data Storage Location 3. Change to data deletion 4. Labeling Function 5. User Registration and deletion 6. Access Rights Management 7. Password Distribution Method 10. Change of Manual 11.Change of Backup Conditions 15. Change to Incident Measures 19. Changes to services subject to exemption
1.5	24 Dec 2021	Changes relating to the addition of Nulab Pass's Audit log function 2. Change of Data Storage Location 3. Data Deletion 5. User Registration and deletion 6. Access Rights Management
1.6	26 Sep 2022	2. Modified the description of data storage location 3. Modified the description of target services for data deletion 11. Changed backup description in Cacoo part 19. Revised the heading and updated the target services
1.7	18 May 2023	5. User Registration and deletion - Change the manual 8. Encryption -Change the User Information 8. Encryption - Add the Database Encryption 11. Backup - Change the For all Nulab Services
1.8	1 Dec 2023	13. Information for Vulnerability Management - Change the vulnerability assessment

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