



SetKeeper Subcontractor Selection Policy

*Last updated: July 31th 2019
Revision by: Hugo Cordier (CTO)
Approved by: Octave Bory (CEO)*

1. Purpose

This document aims to guide SETKEEPER employees in the subcontractor selection process by:

- Identifying a team responsible of selection
- Describing the problem and constraints
- Identifying and qualifying potential subcontractors
- Verifying subcontractor security and associated risk

2. Scope

All SETKEEPER Employees, Managers, Partners, and contractual third parties involved in the selection of any subcontractor on behalf of SETKEEPER.

3. Policy

3.1 Identifying a team to make the selection

At least one technical background employee and one employee with business knowledge.

3.2 Describing the problem and constraints

The team should produce a brief document summarizing the subcontractor selection process, and containing the following items:

- describing the problem to be solved and the functional and technical requirements to be addressed by the subcontractor.
- completely identifying all of the work to be performed under the proposed subcontract and organize the work into manageable pieces
- identifying budget constraints and key milestones and schedule dates for the subcontracting arrangement



Use the techniques for measuring project size and complexity to quantify, to the extent possible, the amount of work that the subcontractor is expected to complete.

Establish a maximum budget for the subcontracted piece of work, based on business considerations, the project size and complexity, and a high-level estimate of the costs and material resources required.

Identify the major milestones and schedule dates for the subcontractor, based on the business needs, and any other applicable dates.

This will help thinking through all elements of the subcontracting approach.

3.3 Identifying and qualifying potential subcontractors

Prepare a list of the subcontractors who will be invited to participate in the formal selection process.

Take into consideration which potential subcontractors have a good reputation and track record with the customer. Also consider our previous experience with this potential teaming partner.

Where there are a large number of potential subcontractors, consider using a questionnaire to pre-screen prospective subcontractors, based on the commitment of each subcontractor to established quality principles.

Ask those subcontractors who indicate agreement with the quality principles to respond to the questions in the Checklist for Assessing Subcontractor Quality to verify their commitment. Augment the list of questions as appropriate, based on the nature of the potential relationship.

Review and rate the responses to these questions (for example using a scale of 0 to 10, with 0 meaning non-compliance and 10 meaning full compliance).

3.4 Verifying subcontractor security and associated risk

The team should produce a brief document summarizing the subcontractor security assessment process, and containing the following items:

- identification of the types information the subcontractor may have access to (whether from the Customer directly or from another third party). Level of confidentiality is part of SETKEEPER Data Collection Policy.
- Identification of the specific types of risks posed by the Subcontractor
- assignment of a risk level posed by the Subcontractor for the types of risks identified
- assessment of third-party risk, and required mitigations from SETKEEPER and/or the Subcontractor



3.5 Mitigation process

If any mitigation is required from SETKEEPER and/or the Subcontractor, follow SETKEEPER Risk mitigation process described in SetKeeper Information Security Incident Policy.

3.6 Periodic review of subcontractors

Subcontractor process, infrastructure, security can change along the way. This require us to periodically perform a check. This check should be performed once a year. A document should be produced specifying if any of the following changed:

- Scope of contract
- Type of information shared with Subcontractor
- Known breaches and remediations

3.7 SetKeeper Sub-processors

SetKeeper may sub-contract or outsource the processing of Processed Data to some of the other persons or entities listed below:

- Datadog, Inc (USA)
- Intercom, Inc. (USA)
- Amazon Web Services, Inc. (USA)
- Microsoft, inc. (USA)
- MongoDB, Inc. (USA)
- Google, Inc. (USA)
- Stripe, Inc (USA)
- Base, Inc (USA)
- HubSpot Inc. (USA)
- Aircall.io, Inc. (USA)
- Paycove, Inc. (USA)
- SendGrid, Inc. (USA)
- Dropbox, Inc (USA)
- HelloSign, Inc (USA)