# **ITHAKA**

# SOC 3 Report

ITHAKA HARBORS Inc. November 16, 2023 to November 15, 2024

An Independent Service Auditor's Report on Controls Relevant to Security

AICPA SOC

# AUDIT AND ATTESTATION BY





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# **SECTION 1**

Management's Assertion



### **Management Assertion**

We are responsible for designing, implementing, operating, and maintaining effective controls within ITHAKA HARBORS Inc.'s ITHAKA HARBORS Inc. system (the system) throughout the period November 16, 2023 to November 15, 2024, to provide reasonable assurance that ITHAKA HARBORS Inc.'s service commitments and system requirements relevant to security were achieved. Our description of the boundaries of the system is presented in Attachment A [A] and identifies the aspects of the system covered by our assertion.

We have performed an evaluation of the effectiveness of controls within the system throughout the period November 16, 2023 to November 15, 2024, to provide reasonable assurance that ITHAKA HARBORS Inc.'s service commitments and system requirements were achieved based on the trust services criteria relevant to security (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). ITHAKA HARBORS Inc.'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 and system requirements related to the applicable trust services criteria are presented in Attachment A [A].

ITHAKA HARBORS Inc. uses a subservice organization for cloud hosting services. The description indicates that complementary subservice organization controls that are suitably designed and operating effectively are necessary, along with controls at ITHAKA HARBORS Inc., to achieve ITHAKA HARBORS Inc.'s service commitments and system requirements based on the applicable trust services criteria. The description presents ITHAKA HARBORS Inc.'s controls, the applicable trust services criteria, and the types of complementary subservice organization controls assumed in the design of ITHAKA HARBORS Inc.'s controls. The description does not disclose the actual controls at the subservice organization.

The description indicates that complementary user entity controls that are suitably designed and operating effectively are necessary, along with controls at ITHAKA HARBORS Inc., to achieve ITHAKA HARBORS Inc.'s service commitments and system requirements based on the applicable trust services criteria. The description presents ITHAKA HARBORS Inc.'s controls, the applicable trust services criteria, and the complementary user entity controls assumed in the design of ITHAKA HARBORS Inc.'s controls.

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 November 16, 2023 to November 15, 2024, to provide reasonable assurance that ITHAKA HARBORS Inc.'s service commitments and system requirements were achieved based on the applicable trust services criteria.

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# SECTION 2

Independent Service Auditor's Report



# Independent Service Auditor's Report

To: ITHAKA HARBORS Inc.

#### Scope

We have examined ITHAKA HARBORS Inc.'s accompanying assertion in Section I, titled "Management's Assertion" (the assertion) that the controls within ITHAKA HARBORS Inc.'s ITHAKA HARBORS Inc. system (the system) were effective throughout the period November 16, 2023 to November 15, 2024, to provide reasonable assurance that ITHAKA HARBORS Inc.'s service commitments and system requirements were achieved based on the trust services criteria relevant to security (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).

ITHAKA HARBORS Inc. uses a subservice organization for cloud hosting services. The description indicates that complementary subservice organization controls that are suitably designed and operating effectively are necessary, along with controls at ITHAKA HARBORS Inc., to achieve its service commitments and system requirements based on the applicable trust services criteria. The description presents ITHAKA HARBORS Inc.'s controls, the applicable trust services criteria, and the types of complementary subservice organization controls assumed in the design of ITHAKA HARBORS Inc.'s controls. The description does not disclose the actual controls at the subservice organization. Our examination did not include the services provided by the subservice organization, and we have not evaluated the suitability of the design or operating effectiveness of such complementary subservice organization controls.

The description indicates that certain complementary user entity controls that are suitably designed and operating effectively are necessary, along with controls at ITHAKA HARBORS Inc., to achieve ITHAKA HARBORS Inc.'s service commitments and system requirements based on the applicable trust services criteria. The description presents ITHAKA HARBORS Inc.'s controls, the applicable trust services criteria, and the complementary user entity controls assumed in the design of ITHAKA HARBORS Inc.'s controls. 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.

#### Service Organization's Responsibilities

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

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#### 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 AICPA. 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 the following:

- Obtaining an understanding of the system and the service organization's service commitments and system requirements
- Assessing the risks that the controls are not effective to achieve ITHAKA HARBORS Inc.'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 ITHAKA HARBORS Inc.'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.

We are required to be independent and to meet our other ethical responsibilities in accordance with relevant ethical requirements relating to the engagement.

#### **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 risks 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 ITHAKA HARBORS Inc.'s ITHAKA HARBORS Inc. system were effective throughout the period November 16, 2023 to November 15, 2024, to provide reasonable assurance that ITHAKA HARBORS Inc.'s service commitments and system requirements were achieved based on the applicable trust services criteria is fairly stated, in all material respects.

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

Signed by: Prescient Assurance CB3321F0572C473

Prescient Assurance LLC January 3, 2025

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# SECTION 3

Attachment A



### **Company Overview and Types of Products and Services Provided**

#### **Company Background**

Ithaka Harbors, Inc. d/b/a ITHAKA is a nonprofit with a mission to improve access to knowledge and education for people around the world. We believe education is key to the well-being of individuals and society, and we work to make it more effective and affordable.

We help make higher education and access to knowledge more affordable; we improve outcomes for students and researchers; and we preserve knowledge for future generations.

Description of services overview or services provided

JSTOR provides access to more than 12 million journal articles, books, images, and primary sources in 75 disciplines.

JSTOR helps you explore a wide range of scholarly content through a powerful research and teaching platform. We collaborate with the academic community to help libraries connect students and faculty to vital content while lowering costs and increasing shelf space, provide independent researchers with free and low-cost access to scholarship, and help publishers reach new audiences and preserve their content for future generations.

Artstor is the most extensive image resource for educational and scholarly use We bring together more than 2 million images from top museums, archives, scholars, and artists – all rights-cleared for education and research – and provide tools for teaching and learning with visual materials.

Ithaka S+R helps academic and cultural communities serve the public good and navigate economic, technological, and demographic change. Our work aims to broaden access to quality postsecondary education, improve student outcomes, and advance research and knowledge.

Ithaka S+R's strategic advice and support services help institutions improve their performance and further their missions. We generate action-oriented research for institutional decision-making and act as a hub to promote and guide collaboration across the communities we serve. With our partners, we design and evaluate projects that make higher education, scholarly communication, and cultural collections more accessible to diverse populations.

ITHAKA's mission is to improve access to knowledge and education for people around the world. We believe education is key to the well-being of individuals and society. Through our work, we make higher education and access to knowledge more affordable, improve outcomes for students and researchers, and preserve knowledge for future generations. Our services include: JSTOR, Artstor, Portico, and Ithaka S+R.

JSTOR provides a platform for discovering and connecting research, images, and primary sources. We partner with libraries, museums, and publishers to reduce costs, extend access, and preserve

scholarship for the future. JSTOR includes content from over 2,000 organizations and serves 11,000+ universities, schools, and institutions in 176 nations.



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Ithaka S+R provides collaborative strategies and research for higher education and the arts. We partner with foundations, consortia, and individual institutions to seek solutions and inform policies in a rapidly changing environment. We generate action-oriented research for institutional decision-making and act as a hub to promote and guide collaboration across the communities we serve. With our partners, we design and evaluate projects that make higher education, scholarly communication, and cultural collections more accessible to diverse populations. Our extensive, freely accessible library includes 200+ research reports and issue briefs, and 500+ blog posts.

The Artstor Digital Library ("ADL") is the most extensive online image resource for educational and scholarly use. We bring together media from top museums, archives, scholars, and artists, with a specialized suite of tools for teaching and learning with visual materials — all rights-cleared for education and research. ADL includes 2.5+ million high-quality images from 280+ contributors and serves nearly 2,000 universities, schools, and museums in 56 countries.

Portico is a community-supported preservation archive that safeguards access to e-journals, e-books, and digital collections. Portico's unique, trusted process ensures that the content will remain accessible and usable for researchers, scholars, and students in the future. Over 1,200 libraries support Portico to preserve content from over 1,000 publishers.

Constellate is a service for teaching, learning, and performing text analysis with scholarly and primary source content from JSTOR, Portico, and partners. It allows instructors to easily and confidently incorporate text analysis into their curricula.

The JSTOR Access in Prison Initiative brings JSTOR's library of high-quality educational content to students at correctional facilities to improve their educational experience and outcomes. With access to our ever-growing database of academic resources, students inside can develop critical research and information literacy skills that set them up for success.

# The Principal Service Commitments and System Requirements

ITHAKA designs its processes and procedures related to the system to meet its objectives. Those objectives are based on the service commitments that ITHAKA makes to user entities, the laws, and regulations that govern the provision of the services, and the financial, operational, and compliance requirements that ITHAKA has established for the services. The system services are subject to the Security commitments established internally for its services.

ITHAKA's commitments to users are communicated through the Terms and Conditions of Use, Service Level Agreements (SLAs) or Master Service Agreements (MSAs), online Privacy Policy, and in the description of the service offering provided online.

Security commitments

Security commitments include, but are not limited to, the following:

• Maintaining a number of security policies that set the tone for our commitment to security



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- System features and configuration settings designed to authorize user access while restricting unauthorized users from accessing information not needed for their role
- Use of intrusion detection systems to prevent and identify potential security attacks from users outside the boundaries of the system
- Regular vulnerability scans over the system and network, and penetration tests over the production environment and treatment of findings in accordance with our security policies
- Operational procedures for managing security incidents and breaches, including notification procedures
- Use of encryption technologies to protect customer data both at rest and in transit
- Use of data retention and data disposal
- Providing security training and orientation to staff
- Up time availability of production systems
- Annual independent audit of the design and effectiveness of controls that are relevant to security

# The Components of the System Used to Provide the Services

The System is comprised of the following components:

- Two different infrastructures, cloud and on-premises.
- Software The application programs and IT system software that supports application programs (operating systems, middleware, and utilities), the types of databases used, the nature of external facing web applications, and the nature of applications developed in-house, including details about whether the applications in use are mobile applications or desktop or laptop applications.
- People The personnel involved in the governance, operation, security, and use of a system (business unit personnel, developers, operators, user entity personnel, vendor personnel, and managers).
- Data The types of data used by the system, such as transaction streams, files, databases, tables, and output used or processed by the system.
- Procedures The automated and manual procedures related to the services provided, including, as appropriate, procedures by which service activities are initiated, authorized, performed, and delivered, and reports and other information prepared.

ITHAKA maintains system inventories that includes cloud resources, on-premises resources, virtual machines, computers (desktops and laptops), and networking devices (switches and routers). The inventories document device name, inventory type, description and owner.

#### People

The company employs dedicated team members to handle major product functions, including operations, and support. The IT/Engineering Team monitors the environment, as well as manages data backups and recovery. The Company focuses on hiring the right people for the right job as well as training them both on their specific tasks and on the ways to keep the company and its data secure.

ITHAKA has a staff of approximately 400 organized in the following functional areas:



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Management: Individuals who are responsible for enabling other employees to perform their jobs effectively and for maintaining security and compliance across the environment. This includes:

President - Kevin Guthrie General Counsel - Nancy Kopans COO - Nathalie Udo CFO & Treasurer - Arielle Ali CTO - Michelle Lee VP, Outreach - Rebecca Seger VP, Marketing - Harmony Faust

Engineering: engineering and product teams for the services ITHAKA provides (see "Description of services overview or services provided" above) are responsible for developing, maintaining, and operating the applications of those services, and the cloud and some on-premises infrastructure those applications run on. Responsible for testing, deployment, and maintenance of the source code of those systems.

Information Technology Services (IT Services): Responsible for managing laptops, software, and other technology involved in employee productivity and business operations.

Information Technology Infrastructure (ITI): Responsible for managing on-premises networking, including VPN access for remote employees and wi-fi in offices, provisioning and management of Unix system, Windows systems and hardware, some Domain Name Service administration, and works jointly with Engineering on the communications to and from ITHAKA's AWS footprint. Members of the engineering team may also be members of the operations team.

Product Development: Responsible for the product development, design and research into users in support of product development and organization goals. Responsible for the product life cycle, including adding additional product functionality.

Outreach: The Outreach & Participation Services (OPS) team is responsible for growing and maintaining library participation in JSTOR, Artstor and Portico worldwide. The team talks to current and potential participants on a daily basis about the JSTOR platform and Portico preservation services. The team regularly exhibits at community conferences, hosts informational webinars, and visits school campuses. The main mission is to spread participation as broadly as possible.

Marketing: ITHAKA's Marketing team leads our organizational efforts to tell ITHAKA's story, history, and mission, and to create awareness, leads, and loyalty for our products and services.

Financial Services supports ITHAKA's mission by maintaining healthy fiscal operations. Financial Services supports budget management, invoicing, and staff reimbursements, and supports decision-making with financial reporting, analysis, and financial guidance and advice.

Legal: The Legal Team uses its expertise to enable ITHAKA and support its day-to-day and long-term needs in ways that are efficient, effective, and strategically-minded.



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#### Processes and procedures

Management has developed and communicated policies and procedures to manage the information security of the system. Changes to these procedures are performed annually and authorized by management, the executive team, and control owners. These procedures cover the following key security life cycle areas:

- Physical Security
- Logical Access
- Availability
- Change Control
- Data Communications
- Risk Assessment
- Data Retention
- Vendor Management

#### Logical access

ITHAKA provides employees and contractors access to infrastructure via a role-based access control system, to ensure uniform, least privilege access to identified users and to maintain simple and repeatable user provisioning and deprovisioning processes.

Access to these systems are split into admin roles, user roles, no access roles, and Engineer. User access and roles are reviewed on an annual basis to ensure least privilege access.

IT Services is responsible for provisioning access to the system based on the employee's role and after completion of a favorable background check by ITHAKA Work, Life, and Culture (Talent Acquisition) team . The employee is responsible for reviewing ITHAKA's policies, and completing privacy/security training. These steps must be completed within 14 days of hire.

When an employee is terminated, IT Services is responsible for deprovisioning access to all in scope systems within 3 days for that employee's termination.

Computer operations - availability

ITHAKA maintains an incident response plan to guide employees on reporting and responding to any information security or data privacy events or incidents. Procedures are in place for identifying, reporting and acting upon breaches or other incidents.

ITHAKA internally monitors all applications, including the web UI, databases, and cloud storage to ensure that service delivery matches SLA requirements.

ITHAKA utilizes vulnerability scanning software that checks source code for common security issues as well as for vulnerabilities identified in open-source dependencies and maintains an internal SLA for responding to those issues.

Change management



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ITHAKA maintains documented Systems Development Life Cycle (SDLC) policies and procedures to guide personnel in documenting and implementing application and infrastructure changes. Change control procedures include change request and initiation processes, documentation requirements, development practices, quality assurance testing requirements, and required approval procedures.

A ticketing system is utilized to document the change control procedures for changes in the application and implementation of new changes. Quality assurance testing and User Acceptance Testing (UAT) results are documented and maintained with the associated change request. Development and testing are performed in an environment that is logically separated from the production environment. Product and team leaders approve and/or manage approval systems or practices to ensure approvals are tracked and recorded.

Version control software is utilized to maintain source code versions and migrate source code through the development process to the production environment. The version control software maintains a history of code changes to support rollback capabilities and tracks changes to developers.

#### Boundaries of the system

The boundaries of the JSTOR, Artstor, Portico, and Ithaka S+R are the specific aspects of the Company's infrastructure, software, people, procedures, and data necessary to provide its services and that directly support the services provided to customers. Any infrastructure, software, people, procedures, and data that indirectly support the services provided to customers are not included within the boundaries of the JSTOR, Artstor, and Ithaka S+R.

This report does not include the Cloud Hosting Services.

# The Applicable Trust Services Criteria and the Related Controls Designed to Provide Reasonable Assurance that the Service Organization's Service Commitments and System Requirements were Achieved

#### Integrity and ethical values

The effectiveness of controls cannot rise above the integrity and ethical values of the people who create, administer, and monitor them. Integrity and ethical values are essential elements of ITHAKA's control environment, affecting the design, administration, and monitoring of other components. Integrity and ethical behavior are the product of ITHAKA's ethical and behavioral standards, how they are communicated, and how they are reinforced in practices. They include management's actions to remove or reduce incentives and temptations that might prompt personnel to engage in dishonest, illegal, or unethical acts. They also include the communication of entity values and behavioral standards to personnel through policy statements and codes of conduct, as well as by example.

Specific control activities that the service organization has implemented in this area are described below:

• Formally, documented organizational policy statements and codes of conduct communicate entity values and behavioral standards to personnel.



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- Policies and procedures require employees sign an acknowledgment form indicating they have been given access to the employee manual and understand their responsibility for adhering to the policies and procedures contained within the manual.
- A confidentiality statement agreeing not to disclose proprietary or confidential information, including client information, to unauthorized parties is a component of the employee handbook.
- Background checks are performed for employees as a component of the hiring process.

#### **Commitment to competence**

ITHAKA's management defines competence as the knowledge and skills necessary to accomplish tasks that define employees' roles and responsibilities. Management's commitment to competence includes management's consideration of the competence levels for jobs and how those levels translate into the requisite skills and knowledge.

Specific control activities that the service organization has implemented in this area are described below:

- Management has considered the competence levels for particular jobs and translated required skills and knowledge levels into written position requirements.
- Training is provided to maintain the skill level of personnel in certain positions.

#### Management's philosophy and operating style

The ITHAKA management team must balance two competing interests: continuing to grow and develop in a cutting edge, rapidly changing technology space while remaining excellent and conservative stewards of the highly sensitive data and workflows our customers entrust to us.

The management team meets frequently to be briefed on technology changes that impact the way ITHAKA can help customers build data workflows, as well as new security technologies that can help protect those workflows, and finally any regulatory changes that may require ITHAKA to alter its software to maintain legal compliance. Major planned changes to the business are also reviewed by the management team to ensure they can be conducted in a way that is compatible with our core product offerings and duties to new and existing customers.

Specific control activities that the service organization has implemented in this area are described below:

- Management is periodically briefed on regulatory and industry changes affecting the services provided.
- Executive management meetings are held to discuss major initiatives and issues that affect the business.

#### Organizational structure and assignment of authority and responsibility

ITHAKA's organizational structure provides the framework within which its activities for achieving entity-wide objectives are planned, executed, controlled, and monitored. Management believes



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establishing a relevant organizational structure includes considering key areas of authority and responsibility. An organizational structure has been developed to suit its needs. This organizational structure is based, in part, on its size and the nature of its activities.

ITHAKA's assignment of authority and responsibility activities include factors such as how authority and responsibility for operating activities are assigned and how reporting relationships and authorization hierarchies are established. It also includes policies relating to appropriate business practices, knowledge, and experience of key personnel, and resources provided for carrying out duties. In addition, it includes policies and communications directed at ensuring personnel understand the entity's objectives, know how their individual actions interrelate and contribute to those objectives, and recognize how and for what they will be held accountable.

Specific control activities that the service organization has implemented in this area are described below:

- Organizational charts are in place to communicate key areas of authority and responsibility.
- Organizational charts are communicated to employees and updated as needed.

#### HR policies and practices

ITHAKA's success is founded on sound business ethics, reinforced with a high level of efficiency, integrity, and ethical standards. The result of this success is evidenced by its proven track record for hiring and retaining top quality personnel who ensures the service organization is operating at maximum efficiency. ITHAKA's human resources policies and practices relate to employee hiring, orientation, training, evaluation, counseling, promotion, compensation, and disciplinary activities.

Specific control activities that the service organization has implemented in this area are described below:

- New employees are required to sign acknowledgement forms for the employee handbook and a confidentiality agreement following new hire orientation at the time of hire or engagement.
- Evaluations for each employee are performed on an annual basis.
- Employee termination procedures are in place to guide the termination process and are documented in a termination checklist.

# Complementary Subservice Organization Controls (CSOCs)

#### Subservice organizations

This report does not include the Cloud Hosting Services provided by cloud hosting providers at multiple facilities.

#### Subservice description of services

The Cloud Hosting Services provided by AWS support the physical infrastructure of the entities services.

#### **Complementary Subservice Organization Controls**



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ITHAKA's services are designed with the assumption that certain controls will be implemented by subservice organizations. Such controls are called complementary subservice organization controls. It is not feasible for all of the trust services criteria related to ITHAKA's services to be solely achieved by ITHAKA control procedures. Accordingly, subservice organizations, in conjunction with the services, should establish their own internal controls or procedures to complement those of ITHAKA.

The following subservice organization controls have been implemented by AWS and included in this report to provide additional assurance that the trust services criteria are met.

#### AWS

Category	Criteria	Control
Security	CC 6.4	Physical access to data centers is approved by an authorized individual.
Security	CC 6.4	Physical access is revoked within 24 hours of the employee or vendor record being deactivated.
Security	CC 6.4	Physical access to data centers is reviewed on a quarterly basis by appropriate personnel.
Security	CC 6.4	Closed circuit television cameras (CCTV) are used to monitor server locations in data centers. Images are retained for 90 days, unless limited by legal or contractual obligations.
Security	CC 6.4	Access to server locations is managed by electronic access control devices.
Availability	A 1.2	AWS maintains formal policies that provide guidance for information security within the organization and the supporting IT environment.
Availability	A 1.2	AWS has a process in place to review environmental and geo-political risks before launching a new region.
Availability	A 1.2	Amazon-owned data centers are protected by fire detection and suppression systems.
Availability	A 1.2	Amazon-owned data centers are air conditioned to maintain appropriate atmospheric conditions. Personnel and systems monitor and control air temperature and humidity at appropriate levels.
Availability	A 1.2	Uninterruptible Power Supply (UPS) units provide backup power in the event of an electrical failure in Amazon owned data centers
Availability	A 1.2	Amazon-owned data centers have generators to provide backup power in case of electrical failure.

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Category	Criteria	Control
Availability	A 1.2	Contracts are in place with third-party colocation service providers which include provisions to provide fire suppression systems, air conditioning to maintain appropriate atmospheric conditions, Uninterruptible Power Supply (UPS) units, and redundant power supplies. Contracts also include provisions requiring communication of incidents or events that impact Amazon assets and/or customers to AWS.

ITHAKA's management, along with the subservice provider, define the scope and responsibility of the controls necessary to meet all the relevant trust services criteria through written contracts, such as service level agreements. In addition, ITHAKA performs monitoring of the subservice organization controls, including the following procedures:

- Reviewing and reconciling output reports
- Holding periodic discussions with vendors and subservice organization(s)
- Reviewing attestation reports over services provided by vendors and subservice organization(s)
- Monitoring external communications, such as customer complaints relevant to the services by the subservice organization

# Any specific criterion of the applicable trust services criteria that is not relevant to the system and the reasons it is not relevant

Criteria not applicable to the system

All Common Criteria/Security, Security criteria were applicable to the ITHAKA's JSTOR, Artstor, Portico, and Ithaka S+R system.

# **Disclosures of Significant Changes In Last 1 Year**

Changes to the system (during audit period, "Type 1")

ITHAKA started a limited beta program by which institutions can get access to the Generative AI Assistant feature for all their users in the Fall of 2024.

Changes to the system (since last review, "Type 2")

On August 1st, 2024, the old website for the Artstor business (<u>https://library.artstor.org/</u>) was retired, the content and features were moved gradually to the main JSTOR site (<u>https://www.jstor.org</u>) over the past two years.

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