

## Cloud Service Provider Disclosure (SS 584:2020 MTCS)

The form is to be completed for each cloud service provided. For questions not applicable or not disclosed, indicate accordingly in the remarks.

Date of disclosure: 9 October 2025

Applicable cloud service(s): Zscaler Zero Trust Exchange

### Cloud Service Provider Contact Information

Company name: Zscaler, Inc.

Primary address:

120 Holger Way

San Jose, California 95134

United States of America

Web address: <https://www.zscaler.com>

Contact name: Joshua Leong

Contact number: +81 80-7115-5341

Contact email: [jleong@zscaler.com](mailto:jleong@zscaler.com)

Information security liaison:

Zscaler Compliance

120 Holger Way,

San Jose, California 95134

United States of America

Email: [compliance@zscaler.com](mailto:compliance@zscaler.com)

Related affiliate for MTCS services:

ZSC Holdings Limited Singapore (UEN Registration no. T13FC0129E)

Singapore Land Tower, Levels 45-47, 50 Raffles Place

048623, Singapore

Chris Potts

VP, Corporate Controller

MTCS certificate number: MTCS-2023-0017

Company stamp: \_\_\_\_\_

Company representative signature: \_\_\_\_\_

Signed by:  
  
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October 12, 2025 5:55 PM PDT

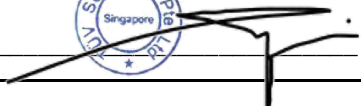
**Certification Body Contact Information**

Company name: TÜV SÜD PSB Pte Ltd  
Web address: <https://www.tuvsud.com/sq>

Contact name: ERICHSEN SOONG

Contact number: 87775844 Contact email: [erichsen.soong@tuvsud.com](mailto:erichsen.soong@tuvsud.com)

Company stamp: \_\_\_\_\_



Lead auditor signature: \_\_\_\_\_



**Cloud Service Provider Background**

Overview of service offering:

Zscaler leverages its Zero Trust Exchange platform with over 150 globally distributed locations to provide services that secure our customers' digital transformation activities such as Secure Services Edge(SSE) through Zscaler Internet Access(ZIA), universal Zero Trust Network Access(ZTNA) via Zscaler Private Access(ZPA), end to end visibility into worldwide user experience and network performance with Zscaler Digital Experience(ZDX), protecting customer data in the cloud with Data Security Posture Management (DSPM) and active defence of customer networks with Deception.

Service model:

- Virtual machine instances owned by the cloud service customer
- Network facilities
- Compliance with applicable standards

Deployment model:

- Private cloud
- Community cloud
- Hybrid cloud
- Public cloud

Tier:

- Level 1
- Level 2
- Level 3

No.	Criteria	Description	Remarks
Legal and Compliance			
1.	Right to audit	<p>The cloud service customer has the right to audit:</p> <ul style="list-style-type: none"> <li>Virtual machine instances owned by the cloud service customer</li> <li>Network facilities</li> <li>Compliance with applicable standards</li> <li>Technical controls</li> <li>Policies and governance</li> <li>Data centre facilities</li> <li>Others</li> <li>None</li> </ul> <p>Regulators recognised by Singapore law have the right to audit:</p> <ul style="list-style-type: none"> <li>Virtual machine instances owned by the cloud service customer</li> <li>Network facilities</li> <li>Compliance with applicable standards</li> <li>Technical controls</li> <li>Policies and governance</li> <li>Data centre facilities</li> <li>Others</li> <li>None</li> </ul> <p>Audit / assessment reports that can be made available on request:</p> <ul style="list-style-type: none"> <li>Penetration test</li> <li>Threat and vulnerability risk assessment</li> <li>Vulnerability scan</li> <li>Audit reports (e.g. Statement on Standards for Attestation Engagements (SSAE) No. 16, Reporting on Controls at a Service Organisation)</li> </ul>	<p>Zscaler possesses numerous security certifications under widely recognized schemes such as SOC2, multiple ISO standards, CSA STAR Level 2 etc., and makes related certificates and reports available to CSCs via its website so that they may verify compliance.</p> <p>Artifacts such as internal documents, details of configurations and access to physical sites may be provided only to authorized auditors if they are required to demonstrate compliance.</p> <p>As Zscaler provides its services under a SaaS model, the CSC does not own or operate any virtual machine instances.</p>

2.	Compliance	<p>The following guidelines / standards / regulations are adhered to:</p> <p>Singapore Personal Data Protection Act          ISO/IEC 27001          ISO 9000          ISO/IEC 20000          CSA Open Certification Framework(CSA STAR)          PCI-DSS          Others: ISO 27701, ISO 27017, ISO 27018, SOC 2</p>	<p>Details of Zscaler's compliance with various standards and frameworks, including access to certificates and reports, may be found at <a href="https://www.zscaler.com/compliance/overview">https://www.zscaler.com/compliance/overview</a></p> <p>Zscaler has assessed its obligations under the Singaporean PDPA as a data intermediary and provides appropriate information customers about how these requirements are satisfied at <a href="https://www.zscaler.com/privacy-compliance/pdpa">https://www.zscaler.com/privacy-compliance/pdpa</a></p> <p>Zscaler is not within scope of the PCI DSS as it does not acquire, store or transmit any cardholder data, nor is it a TPSP vendor under the standard.</p>
Data Control			
3.	Data ownership	<p>All data on the cloud service is owned by the cloud service customer except for:</p> <p>_____</p> <p>The cloud service customer retains the ownership on the derived data or attributes of cloud usage except for the following:</p> <p>Advertising or marketing          Statistics analysis on usage          Others</p> <p>_____</p>	<p>Customer data in the Zscaler cloud is limited to logs, which the customer retains ownership of.</p>

<p>4.</p>	<p>Data retention</p>	<p>Data deleted by the cloud service customer is retained as follows:</p> <p>Minimum data retention period is: _____  Maximum data retention period is: _____  Deleted immediately</p> <p>Log data is retained for a period of:  Minimum data retention period is: _____  Maximum data retention period is: six months if storing logs in the Zscaler cloud  Deleted immediately</p> <p>Cloud service customer data is retained for a period of:</p> <p>Minimum data retention period is: _____  Maximum data retention period is: _____  Not retained</p> <p>The following types of data are available for download by the cloud service customer:</p> <p>Log data  Others _____</p>	<p>Customer logs stored in the Zscaler cloud cannot be deleted for accountability purposes, and are retained for a rolling period of six months or as specified per service at <a href="https://help.zscaler.com/logs-fair-use">https://help.zscaler.com/logs-fair-use</a></p> <p>Some Zscaler services have the option of a log streaming function which allows logs to be stored in customer-controlled storage like a SIEM, so that logs can be stored for any desired period as defined by the customer.</p>
<p>5.</p>	<p>Data sovereignty</p>	<p>The primary data locations are:</p> <p>Singapore  Asia Pacific _____  Europe(Germany, Netherlands, Switzerland)  United States  Others _____</p> <p>The backup data locations are:</p> <p>Singapore  Asia Pacific _____  Europe _____  United States  Others _____</p> <p>No. of countries in which data centres are operated: _____</p> <p>The cloud service customer's data stored in the cloud environment will never leave the locations specified in item 5:</p> <p>Yes  Yes, except as required by law  Yes, except as noted: _____</p>	<p>Sites storing customer data are limited to a small subset of locations as per item 5. The majority of Zscaler sites worldwide are points of presence that only serve to process customer traffic and do not save any data to disk.</p> <p>Sites storing customer data synchronize with each other such that redundant copies of customer data exist in a geographically distributed fashion. Thus in the event of site failure, the service provision can failover seamlessly to the other sites,</p>

		<p>Cloud service customer's consent is required prior to transferring data to a location not specified in item 5 or a third party:</p> <p>Yes                      Yes, except as required by law                      Yes, except as noted: _____                      No</p> <p><i>Note: Cloud service customers are responsible for determining the impact of data protection and data sovereignty laws on the locations where data is stored. In addition, cloud service customers should understand the risks associated with relevant laws that may allow for law enforcement or other government access to data in-transit or storage with Cloud Service Providers.</i></p>	mitigating the need for discrete backups.
6.	Non-disclosure	<p>Non-disclosure agreement template can be provided by Cloud Service Provider                      Cloud Service Provider may use customer's NDA (pending legal review)</p>	Standard terms regarding confidentiality and treatment of confidential information are included in Zscaler's End User Subscription Agreement
Provider Performance			
7.	Availability	<p>The committed network uptime is:                      _____%                      Varies according to price plan</p> <p>The committed system uptime is:                      _____%                      Varies according to price plan</p> <p>The cloud environment has the following single points of failure:                      _____                      None</p>	<p>The agreed availability of Zscaler services is dependent on the individual service. All services are protected by SLA, the details of which can be viewed at <a href="https://www.zscaler.com/legal/sla-support">https://www.zscaler.com/legal/sla-support</a></p>

<p>8.</p>	<p>3<sup>rd</sup> party dependency</p>	<p>Highlight areas of critical dependency for service delivery:</p> <p>Zscaler uses other cloud service providers such as Amazon AWS, Google Cloud Platform and Microsoft Azure to provide certain elements of the Zero Trust Exchange infrastructure. A full list may be found under the “Hosting Provider” heading of Zscaler’s sub-processor listing here: <a href="https://www.zscaler.com/privacy-compliance/subprocessors">https://www.zscaler.com/privacy-compliance/subprocessors</a></p> <p>Where Zscaler owns and operates physical hardware infrastructure, it is located in colocation data centers operated by third party providers.</p> <p>Risks and dependencies arising from the abovementioned providers are managed through Zscaler’s third party risk management program, which requires thorough and cross-functional assessment and vetting of all vendors prior to onboarding and ongoing monitoring and review of risk assessments thereafter.</p>	
<p>9.</p>	<p>BCP / DR</p>	<ul style="list-style-type: none"> <li>● Disaster recovery protection</li> <li>● Backup and restore service</li> <li>● Cloud service customer selectable backup plans</li> <li>● Escrow arrangements</li> <li>● No BCP/DR is available</li> <li>● RPO</li> <li>● RTO</li> <li>● Others, please specify: _____</li> </ul>	<p>Zscaler maintains BCP and DRP procedures for its services to uphold the availability commitments in item 7. The geographically distributed architecture of the Zero Trust exchange means that it is resilient to localized disruptions.</p> <p>Core services such as ZIA and ZPA have customer DR options such that they may still use the service in the event of an outage.</p> <p>For some services, customers may create a restore</p>

			point of their configurations which they can roll back to at their choosing.
10.	Liability	<p>The following terms are available for the cloud service customers on failure of the provider to meet the service commitment:</p> <p>Network Liability: failure</p> <hr/> <p>Infrastructure Liability: failure</p> <hr/> <p>Virtual machine instance Liability: failure</p> <hr/> <p>Migrations Liability:</p> <hr/> <p>Unscheduled downtime Liability: <a href="https://www.zscaler.com/legal/sla-support">https://www.zscaler.com/legal/sla-support</a></p> <p>Database Liability: failure</p> <hr/> <p>Monitoring Liability: failure</p> <hr/>	Zscaler provides its customers with Service Level Agreements(SLAs) for each service as described in item 7.
11.	Shared responsibility	<p>Communication of shared roles &amp; responsibilities for which CSC needs to implement and manage for use of this cloud service</p> <p>URL (or attach file): <a href="https://www.zscaler.com/legal/end-user-subscription-agreement">https://www.zscaler.com/legal/end-user-subscription-agreement</a></p>	
Service Support			
12.	Change management	<p>The Cloud Service Provider has established the following for changes, migrations, downtime, and other potential interruptions to cloud services:</p> <p>Communication plan and procedures for proactive notification</p> <p>Assistance in migration to new services when legacy solutions are discontinued</p> <p>Ability to remain on old versions for a defined time period</p> <p>Ability to choose timing of impact</p>	Notifications of upgrades, maintenance and/or other changes is done proactively and as much as possible with prior notice via Zscaler's trust site( <a href="https://trust.zscaler.com">https://trust.zscaler.com</a> )

13.	Self-service provisioning and management	<p>Provide self-service provisioning and management portal for cloud service customers to manage cloud services:</p> <p>Yes No</p> <p>If yes, describe the functions of the self-service provisioning and management portal provided:</p> <p>Allow role-based access control (RBAC)                  Manage resource pools (e.g. VMs, storage, and network) and service templates                  Track and manage the lifecycle of each service                  Track consumption of services                  Health monitoring                  Others: _____</p>	
14.	Incident and problem management	<p>Delivery mode of support:</p> <p>Access via email                  Access via portal                  Access via phone support                  Direct access to support engineers</p> <p>Availability of support:</p> <p>24 x 7                  During office hours support, please specify the hours of operations: _____                  After office hours support, please specify the hours of operations: _____</p> <p>Service response time: As short as 15 minutes, depending on service tier</p> <p>Notification time of cloud service outage incident: Real time in so far as possible</p> <p>Communication channel used for notification of cloud service outage incident: Zscaler trust site(<a href="https://trust.zscaler.com">https://trust.zscaler.com</a>)</p> <p>The following are available to cloud service customers upon request:</p> <p>Permanent access to audit records of customer instances                  Incident management assistance</p> <p>Incident response time: _____</p> <p>Mean time to repair on detection of faults: _____</p>	<p>The details of support availability are dependent on the service and support tier package purchased by the customer, details of which are available at <a href="https://help.zscaler.com/phone-support">https://help.zscaler.com/phone-support</a></p>
15.	Billing	<p>The following billing modes are available (please elaborate granularity of charges and measurement):</p>	

		<p>Pay per usage: Licenses for Zscaler services are charged by user count          Fixed pricing _____ (up to yearly/monthly/daily)          Other pricing model _____          Not disclosed</p> <p>Available billing history: _____ months</p>	
<p>16.</p>	<p>Data portability</p>	<p>Importable VM formats: _____</p> <p>Downloadable formats: Some configuration data or templates can be downloaded as CSV, XML or similar format, but is unique to Zscaler and is not portable to other platforms.</p> <p>Supported operating systems: _____</p> <p>Language versions of supported operating systems:          _____</p> <p>Supported database formats: _____</p> <p>Policy/guide available: _____</p> <p>API:</p> <p>Common _____</p> <p>Customised: the customer can interact with Zscaler services using an API, details of which are available at <a href="https://help.zscaler.com">https://help.zscaler.com</a></p> <p>Upon service termination or prolonged outage, data is available through:</p> <p>Physical media          Standard methods as described above          Other methods: _____</p>	
<p>17.</p>	<p>Interoperability</p>	<p>Use of industry standards and availability of APIs to support interoperability:</p> <p>Transport supported: REST-based HTTPS          Format supported: Common formats such as CSV, XML, JSON etc. as applicable          APIs supported differ by service, please see the guide for more information          Other methods          _____</p> <p>Guide available on a per-service basis at <a href="https://help.zscaler.com">https://help.zscaler.com</a></p>	
<p>18.</p>	<p>Access</p>	<p>Type of access to the service is through:</p>	

		<p>Public access                  Private access (e.g. VPN, dedicated link)                  IPv6 access is supported                  Other access methods</p> <p>_____</p> <p>Public access speed (shared bandwidth) in Mbps:</p> <p>_____</p>	
19.	User Management	<p>Identity management                  Role based access control                  Federated access model                  Integration with Identity management solutions                  Others</p> <p>_____</p>	<p>Zscaler services operate through integration with the customer Identity Provider(IdP) using standard methods such as SAML federation. Zscaler does not provide identity management solutions.</p>
20.	Lifecycle	<p>The cloud service customer may select the following for service upgrades and changes:</p> <p>Automatic provisioning                  Cloud service customer customisable provisioning</p>	
<p>Security Configurations</p>			
21.	Security configuration enforcement checks	<p>Security configuration enforcement checks are performed:</p> <p>Manually                  Using automated tools</p> <p>How often are enforcement checks being performed to ensure all security configurations are applied?                  Weekly</p>	<p>Zscaler production environments are scanned by automated tools such as vulnerability scanners on a weekly basis</p>
22.	Multi-tenancy	<p>Distinct physical hosts                  Distinct physical network infrastructure                  Virtual instance grouping                  Cloud service customer definable security domains                  Cloud service customer customisable firewall                  Cloud service customer definable access policies</p>	<p>Zscaler uses a multi-tenant architecture in which customer tenants and data are logically separated. The customer can configure</p>

			security settings such as regarding access roles and authentication for their tenant through the Zscaler admin portal.
23.	Hybrid cloud provision	<p>Ability to monitor, track, apply and enforce CSC's security &amp; privacy policies on its cloud workloads:</p> <p>Data protection and encryption key mgmt. enforcement geolocation-based/resource pools and secure migration of cloud workloads                      Key mgmt. and keystore controlled by CSC                      Persistent data flow segmentation before and after geolocation based/resource pools secure migration                      Compliance enforcement for regulated workloads between on-premises private and hybrid/public cloud                      Others: Under some services such as ZIA and ZPA, Zscaler offers the ability for the customer to deploy appliances within the organization's network boundary that act as policy enforcement nodes. Thus, the customer retains some control over the security controls applied to the appliance and the environment in which it is operated.</p>	
Service Elasticity			
24.	Capacity elasticity	<p>The following capacity elasticity options are available:</p> <p>Programmatic interface to scale up or down                      Mean time to start and end new virtual instances _____                      Alerts to be sent for unusual high usage                      Minimum performance during peak periods _____                      Minimum duration to scale up computing resources _____                      Minimum additional capacity guaranteed per account _____</p>	The capacity of the Zero Trust Exchange infrastructure is managed by Zscaler and adjusted based on periodic review to ensure that it is able to meet customer demand.
25.	Network resiliency and elasticity	<p>The following network resiliency and elasticity options are available:</p> <p>Redundant Internet connectivity links                      Redundant Internal connectivity                      Selectable bandwidth up to _____ Mbps                      Maximum usable IPs _____                      Load balancing ports _____                      Load balancing protocols _____                      Anti-DDOS protection systems or services</p>	The options in item 25. are available as functions of Zscaler services such as ZIA and ZPA.

		<p>Defence-in-depth mechanisms, please specify: SSE security policy enforcement such as content and web app filtering, malware scanning and sandboxing, Zero Trust Network Access(ZTNA) to private apps etc.</p> <p>Network traffic isolation, please specify: Traffic bound for the Zero Trust Exchange can be routed through encrypted tunnels, high risk web access can be routed through browser isolation to prevent download and/or execution of malicious code</p> <p>Shared or dedicated bandwidth, please specify: _____</p> <hr/> <p>QoS traffic control services</p> <p>Alerts to be sent for unusual high usage</p> <p>Minimum performance during peak periods</p> <hr/> <p>Minimum period to scale up network throughput</p> <hr/>	
<p>26.</p>	<p>Storage elasticity</p>	<p>The following storage redundancy and elasticity options are available:</p> <p>Redundant storage connectivity links within each data centre</p> <p>Redundant storage connectivity links between data centres belonging to the same cloud</p> <p>Storage traffic isolation, please specify:</p> <hr/> <p>Shared or dedicated storage network bandwidth, please specify:</p> <hr/> <p>Quality of service storage traffic control services</p> <p>Maximum storage capacity for entire cloud, please specify: _____</p> <p>Maximum storage capacity for single cloud service customer, please specify:</p> <hr/> <p>Maximum expandable storage, please specify:</p> <hr/> <p>Alerts to be sent for unusual high usage</p> <p>Minimum storage I / O performance during peak periods</p> <hr/> <p>Minimum period to scale up storage I / O throughput</p> <hr/>	<p>The Zero Trust Exchange does not offer data storage functions other than for customer logs.</p>