Brilliant Future

Classification: Public

INSIGHT – CX, EX

Architecture, Compliance and Security White Paper

1 DOCUMENT VERSION CONTROL

Rev	Modified	Modified By	Implemented By	Document Changes
1.0	2023-01-10, 2023-10-09	Johan Pellbäck	Product management team	New template
2.0	2023-10-09	Johan Pellbäck, Sofie Johansson	Product management team	New sections for CX and AI (chapter 4, 6)
2.1	2024-01-15	Johan Pellbäck	Product Management team	More regarding architecture, SSO etc
2.2	2024-02-02	Johan Pellbäck, Sofie Roos	Product Management team	Complementary chapter 5
2.3	2024-03-20	Johan Pellbäck, Mimmi Lindström	Product Management team, Product Design	Description about design system and WCAG fulfilment
2.4	2024-05-30	Johan Pellbäck, Mimmi Lindström	Product Management team, Product Design	Complimentary info regarding usability and WCAG
2.5	2024-08-12	Johan Pellbäck	Architecture team	Chapter 5. SSO, authentication, tenant model, and data isolation
2.6	2024-11-04	Johan Pellbäck, Jonathan Dahlberg	Architecture team	Chapter 5 as part of WAF implementation using Azure Frontdoor Chapter 7 updates in roles and accountability
2.7	2025-01-08	Johan Pellbäck	Product Management Team	Chapter 5.3 regarding logging
2.8	2025-06-12	Johan Pellbäck	Product Management Team	Chapter 4.1 added features regarding content (communication, questions and surveys)
2.9	2025-06-13	Johan Pellbäck	Product Management Team	Chapter 5.5 added HailyHR as integrated HR-solution Chapter 6 regarding risk with AI
3.0	2025-08-18	Johan Pellbäck, Mimmi Lindström	Product Management Team	Updated section 4.2 regarding compliance with WCAG 2.2
3.1	2025-10-07	Johan Pellbäck	Product Management Team	Updated link to our help center
3.2	2026-04-20	Johan Pellbäck, Mattias Jardstedt	Product Management Team	Updates in chapter 5.5 regarding integrations and APIs. Updates in chapter 7 according to ISO 27001 and SDLC.
3.3	2026-05-20	Johan Pellbäck	Jonathan Dahlberg, Mattias Jardstedt	Updates in chapter 5, describing the implementation of email distribution and security (using SPF, DKIM, DMARC)

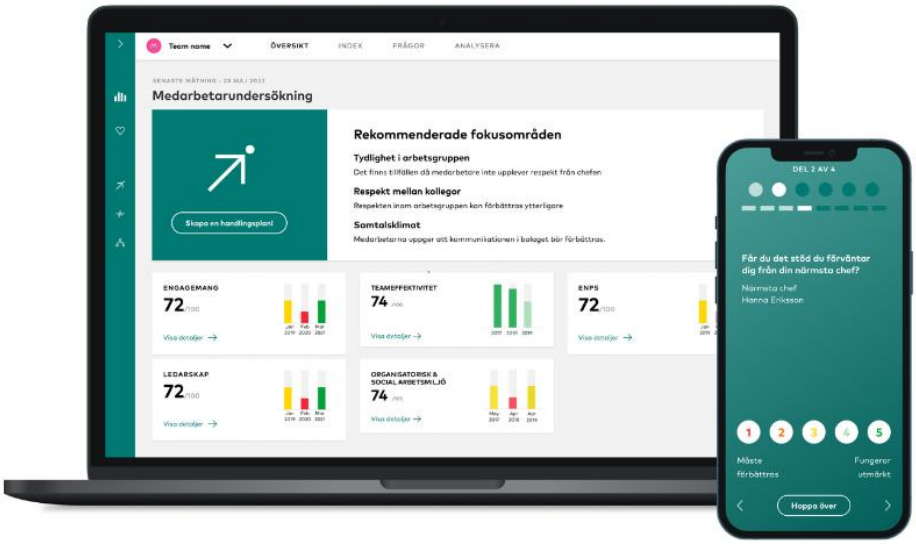
2 DOCUMENT CONTENT PAGE

3 INTRODUCTION

3.1 PURPOSE

Brilliant Future is a Swedish SaaS company that helps organisations to reach their full potential through strengthening employee and customer relations. Brilliant's platform is easy to use and built on a well-known methodology that ensures that the entire organisation focuses on the right things. Our solutions improve employee engagement, develop leaders, strengthen employer brand and customer relations.

This document describes our platform Insight, the architecture, technical- and organisational measures implemented for compliance with laws and regulations (such as GDPR).



3.2 SCOPE

The Insight application, infrastructure, processes and security measures/controls

4 PRODUCTS AND FEATURES

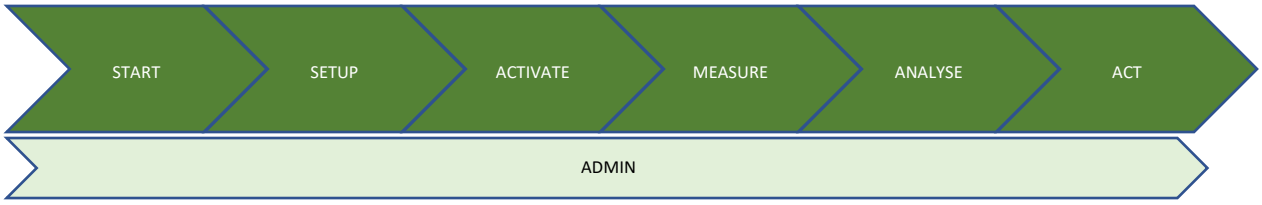
Insight is a web-based solution that supports desktop and mobile devices. With over 20 years of experience in the industry we developed a method that uses engagement as a tool for improvement. Our method is based on scientific studies and our own data. It is proven that our method helps organisations to reach their full potential and become more profitable over time. This is translated into a digital platform that lets employees and managers provide feedback on what works well and what's not. This is presented for HR and managements as insights, with ready to use tools for improvements where it is needed, so they can act on their individual situation.

Today we are supporting a global market in more than 30 languages, targeting medium to large organisations.

The design system is based on the company's graphic profile which can be found in the material we show to our customers. We meet all the requirements for an WCAG AA classification which is essential for creating high availability and a great user experience.

The application is a SaaS solution with the ability to give our customers the full experience and self-service tools to manage organisations, surveys, analytics and reporting as well as other products for managing employee and customer relations.

In section 4.1 we describe a high-level list of features in Insight and the scope of functionalities.



4.1 FEATURES

Feature	Area	Comment
Login & Start Page	Start	Login using Brilliants Auth over standard TLS/HTTPs or Microsoft Azure AD SSO. Insight is a multi-tenant application that supports logins from Azure AD out of the box using OpenID as the underlying protocol. AD setup is managed by the Brilliant Tech delivery team together with the customer. Start page with white papers, event etc. from https://brilliantfuture.se/insight-hub/.
Manage Organisation	Setup	Build the organisational structure through: Excel file uploaded to our SFTP-server (https://sftp.brilliantfuture.se/) then imported by us; batchimport by Excel file directly in the platform; manually in the platform. You can read more about organisation management in our helpcenter.
Create & Activate Survey	Activate	Surveys are created and activated by self-service through a survey wizard in the platform. Survey questions are chosen from Brilliants standard library. Customer unique questions can be ordered, once programmed be Brilliant they will be available through self-service in the platform. You can read more about self-service and survey activation in these articles in our helpcenter.

Active Survey	Measure	Once activated, you'll be able to view response rate, communication status and mail/SMS bounces. Reminders, end date and reporting date can be edit once activated and participants can be added and removed. You can read more about self-service during an active survey in our helpcenter.
Result Calculation & Reporting	Measure	Results are automatically calculated after the chosen survey end date. Users with preview access, normally HR, can preview the result the day after the surveys end date. The result will be reported to managers by mail or SMS on the chosen survey reporting date. Only users with HR or manager permissions will have access to the result.
Survey Data Collection	Measure	Survey data is collected by a respondent unique link sent by e-mail or SMS. In lack of e-mail and phone number, a team unique PIN can be generated and entered at https://www.brilliantinsights.se/pin-code-logon. Brilliant will automatically send the PIN and the PIN-link by e-mail or SMS to the manager of the team in question. Any further distribution is then to be solved by the customer.
Results	Analyse	Results are presented to HR, Managers and other Stakeholders in your organization. **For employee and leadership surveys (EX):** Managers are only allowed to view results for their own team or teams and compare them to aggregated result above them in the organisational hierarchy. Recommended focus areas can be presented, depending on which questions have been chosen in to include in the survey. Index results can be exported to PowerPoint, question results to PDF and heat map to Excel. Action-plans and deeper analysis is also available to further work with the results and improve your organization. **For customer surveys (CX):** Stakeholders are allowed to see results by analysing customer response, comments, NPS results etc. AI is used for deeper analysis of customer response and to give you deeper understanding of the results. NOTE that results in a customer survey is not anonymous as it is for employee and leadership surveys. You can read more about how to understand the results in our helpcenter.
Action plans, Brilliant Workshop and Close the loop	Act	**For employee and leadership surveys (EX):** Action plans can be created in connection to a specific survey or stand alone. Statistics can be viewed and filtered in order to get an overview of which teams are working with the results. It is also possible to use AI to analyse results and to get recommended actions. **For customer surveys (CX):** Stakeholders can analyse results, answers and close the loop with customers. AI is also used for deeper analysis of aggregated results and comments. You can read more about action plans and Brilliant workshop in our helpcenter.

Content (Communication)	Admin	Admin roles in the platform can tailor content such as emails, texts, translations for the purpose of creating customizations for your needs.
Content (questions and survey content)	Admin	Admin roles can use the existing library with Brilliant questions or modify or create your questions for your explicit needs.

4.1.1 Anonymity for Employee surveys (EX)

Brilliant guarantees that answers are handled confidentially, that answers are anonymous and that answer cannot be derived to individual respondents. A complex set of anonymity rules ensures that the anonymity of the respondents is guaranteed. You can read more about how we guarantee the anonymity in our helpcenter: https://insight.brilliantfuture.se/en/exhelp/anonymity.

4.1.2 Languages

Insight supports multiple languages for administrators and for the survey. We have a separate process for adding languages to the survey part, and this could for specific request require an extra cost to our customers.

The admin part (managers, HR etc) supports the following languages: Danish, English, Finish, French, Norwegian, Spanish, Swedish, German, Brasilian Portuguese *, Estonian*, Italian*, Japanese*, Chinese (Mandarin)*, Dutch*, Polish*, Portuguese*

More information can be read here: Brilliant Produktbeskrivning EX | Brilliant (brilliantfuture.se)

(* = require extra cost)

4.2 Web Connectivity Accessibility Guidelines (WCAG)

Brilliant Future is dedicated to meeting the accessibility guidelines according to WCAG 2.2 AA. Below is an explanation of how we fulfil these requirements, as well as identified deviations.

4.2.1 General

All graphical elements on our platform meet the required colour contrast and font size standards to be considered accessible under WCAG 2.2 AA.
Deviation: Certain visual graph components provided through Highcharts may lack alternative text or full screen reader support, which can affect users relying on assistive technologies.

4.2.2 Text Readability

All text on our platform is designed to maintain a LIX value (Readability Index) between 40–60 to ensure good readability.
Deviation: Some system texts and error messages may exceed this range, which can make them more difficult to understand.

4.2.3 Survey

Our surveys are developed to meet WCAG 2.2 AA requirements and are designed to support a broad user group. Since customers can apply their own branding, full compliance cannot always be guaranteed. To address this, we provide an option to adjust contrasting colours. Customers may still choose to proceed with non-compliant settings at their own discretion.
Deviation: Minor deviations may occur, but we remain committed to minimising these instances and continuously improving accessibility.

4.2.4 Supported Devices

The platform supports use on desktop, tablet, and mobile devices.
Deviation: The mobile version is optimised for survey participation, while system configuration and management are recommended to be carried out on larger screens.

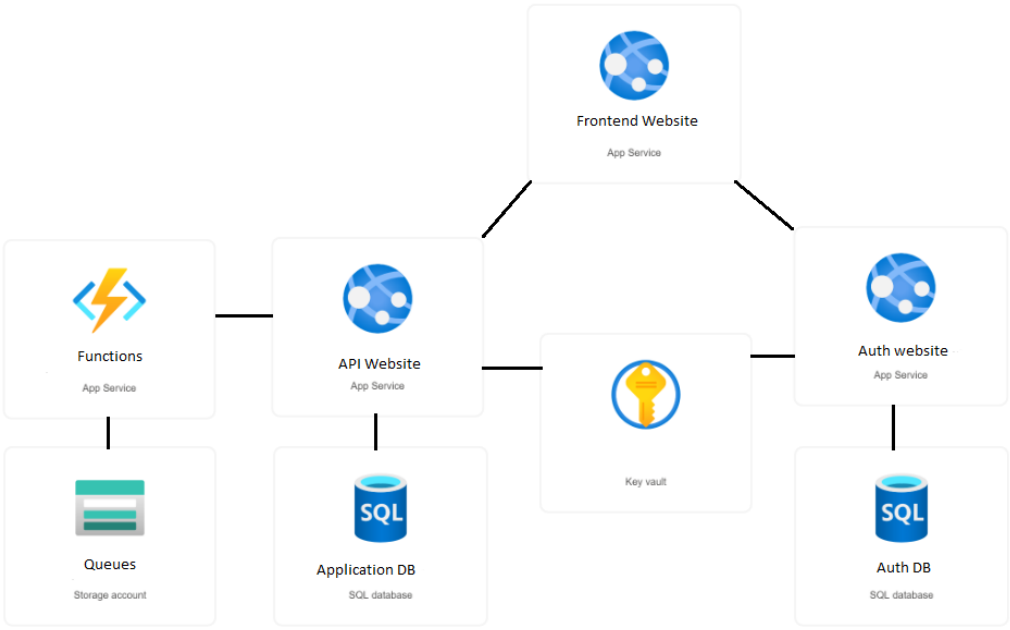
4.2.5 Summary

Brilliant Future is dedicated to fulfilling the requirements of WCAG 2.2 AA. Regular reviews and updates are conducted to ensure the platform remains accessible to all users. We acknowledge the current deviations, primarily related to Highcharts visual graph components, and are actively working to address these and further enhance the user experience for everyone.

5 ARCHITECTURE

Insight is a 100% SaaS application hosted in the cloud using Microsofts Azure. This gives our customers full reliability, scalability and flexibility. We use industry standard components to create a secure and stable environment and together with our MS certified partners we continuously monitor and evaluate the environment for best performance and optimization.

5.1 DEPLOYMENT VIEW



Frontend application is an angular site hosted on an app service and is the main touchpoint for customers. For credential management, login and SSO integrations we use auth website hosted in a separate app service with a separated database.

The main API which the frontend communicates with is hosted in a third app service which connects to the main database of the application as well as an azure function with a storage account for asynchronous tasks.

All security keys and encryption secrets are handled by a key vault.

5.2 SECURITY

5.2.1 Securing web application using firewall (WAF)

The Insight application uses a web application firewall (WAF) using Front Door for secure entry point for web applications hosted on Microsoft Azure. This provides load balancing, high availability, and global distribution for applications. Azure Front Door also protect the applications from common security threats, such as DDoS attacks, SQL injection, and cross-site scripting, while also supporting SSL termination, end-to-end encryption, and customizable routing rules. With WAF actively blocking known vulnerabilities (e.g., OWASP Top 10), the setup protects the environment against common

web application threats. This reduces the likelihood of data breaches or unauthorized access to sensitive information.

5.2.2 Authentication/SSO, data isolation and tenants

SSO: Our Single Sign-On uses multi-tenant model and are designed for security, scalability, and ease of use across our platforms. User authentication is built on top of OAuth 2.0, OIDC designed for authenticating users in modern, web-based applications and mobile apps. Tenant Isolation: Our platform is architected as a multi-tenant system, where each tenant (customer organization) operates in a logically isolated environment. This ensures that each tenant's data remains separate and secure, with robust access controls preventing unauthorized cross-tenant access.

Role based access (RBAC): Within each tenant, we implement fine-grained RBAC to manage user permissions. This allows organizations to define specific roles, such as administrators, analysts, or viewers, to limit access based on the principle of least privilege.

Data isolation: Data for each tenant is logically separated in application as well as in in the database layer. This setup ensures data segregation, preventing data from one tenant from being accessed by users from another tenant.

5.3 LOGGING

Brilliant Insight uses different ways and components for logging, for security and monitoring we use native logging in MS Azure, MS Defender and MS Front door. We also use application-level logging for monitoring security and product related events in the application.

5.3.1 Infrastructure and Security monitoring

Microsoft Defender for Cloud: Insight is continuously monitored using MS Defender, which provides:

- Threat detection for cloud workloads, including VMs, databases, and Kubernetes clusters.
- Anomaly detection for unusual user or system behavior.
- Security recommendations to enhance compliance with Azure security best practices.
- Defender integrates with Azure Sentinel (SIEM) for centralized security analytics and incident response.

Microsoft Azure Front Door: MS Front Door acts as both a Web Application Firewall (WAF) and a DDoS protection layer for Insight. Security capabilities include:

- Rule-based and AI-driven threat detection for SQL injection, XSS, and other web-based attacks.
- Geo-blocking and rate limiting to prevent abuse from suspicious regions.
- DDoS protection against volumetric and application-layer attacks.
- Real-time logging and alerts for malicious activity detected at the network edge (WAF & DDoS Protection)

5.3.2 Application-Level Logging

Insight logs central application events to ensure traceability, incident detection, and forensic capabilities. These logs are stored in the application database or in Azure Monitor / Application

Insights / Log Analytics, depending on the log type and use case. The application-level logging relates primarily to the platform, not the survey part.

Authtentication and Access Control: refer to login events, authorization and role management, such as:

- Successful and failed login attempts (including client information such as IP-addresses, and device information)
- Authorization and Role changes (changes to users, roles, permission)
- Modifications to organizational structures and hierarchy

5.3.3 Log retention

All logs are aggregated and stored centrally and securely. Access to logs is restricted based on least privilege principles and is audited regularly. Logs related to infrastructure and security uses standard mechanisms and policies accordance with GDPR and ISO 27001. Application and product level logging follow the same principles as for all our products, e.g. regarding anonymity and encryption. Retention for application level logging follow the customer licensing period.

5.4 BACKUPS

Insight uses automated backup policy specified in Azure SQL Database.

- Full backups every week
- Differential backups every 12 – 24 hours
- Transaction log backup approximately every 10 minutes

5.4.1 Recovery and retention

Azure SQL Database store backup in a geo-redundant environment, meaning that data is replicated to a paired region in case of a regional outage.

The retention policy follow Microsofts recommendation:

- A quick point in time recovery can be done for up to 7 days
- Weekly backups are saved for 2 months.
- Monthly backups are saved for 6 months.
- A yearly backup is saved for 2 years.

5.5 INTEGRATIONS

The most important thing for a successful implementation of Insight, regardless of whether it concerns customer- or employee surveys, is to build your organisational structure and to find the right structure for reporting and analysis.

Brilliant Insight integrates with external systems to keep your organizational data up to date and to allow you to build on top of your engagement data. All integrations are automated — once configured, they run without manual involvement.

5.5.1 3 types of integrations

Type	How	Example
Direct integration	HR system => Brilliant Insight	Insight connects directly to your HR system's API and syncs data on a schedule
SFTP File import	HR system => SFTP => Brilliant Insight	Your HR system exports a file to a secure SFTP server, Insight picks it up automatically
Public REST-API	Insight <=> Your system	You build your integration directly to us: • Pull engagement data (surveys, results, groups) from Insight into your own tools/BI/master data • Push employee data and update your organizational data directly

5.5.2 Direct integration

A direct integration means Insight connects to your HR system's API and automatically fetches employee and organizational data on a configured schedule.

How it works:

- Insight calls your HR system's API on a schedule (e.g., daily)
- Employee data, departments, and manager relationships are fetched
- Fields are mapped to Insight attributes (using standard or custom mapping)
- Organization rules run automatically to rebuild the group structure

What gets synced:

- Employee data — name, email, phone, birth date, hire date, gender, active status
- Organization structure — departments, locations, teams, legal entities
- Relationships — manager-employee links
- Custom fields — any additional fields your HR system provides

Custom field mapping: You can configure exactly which fields from the HR system map to which attributes in Insight. This includes standard fields (name, email, department) and custom/company-specific fields. Each mapping specifies a source field, a target attribute, and a data type (user, group, or group relation).

Current support:

- AlexisHR – Department-based hierarchy - Departments imported as groups with parent-child structure. Supports divisions, cost centers, and offices
- HailyHR – Manager-based hierarchy - Groups built from reporting lines — each manager becomes a group. Supports departments, locations, legal entities, titles, and teams

To request a direct integration with another HR system, contact your Brilliant representative

5.5.3 SFTP File import

An SFTP integration is a fully automated, file-based integration. Your HR system exports a data file to a secure SFTP server on a schedule, and Insight picks it up automatically — no manual steps involved.

How it works:

- Your HR system runs a scheduled export job (e.g., nightly)
- The job writes a CSV/delimited file to Insight's SFTP server
- Insight picks up the file on its own schedule
- The file is parsed using configured column mapping
- Employee and organizational data is imported
- Organization rules run automatically to rebuild the group structure

Configuration:

- SFTP server address, folder, and credentials (provided by Brilliant)
- Column definitions — which columns in the file map to which Insight attributes

This is a true integration, not a manual process. Once the scheduled export is configured in your HR system, data flows automatically without any human involvement.

See our helpcenter for a complete list of HR-systems that support automatic export of employee data: https://insight.brilliantfuture.se/en/exhelp/integration-overview

5.5.4 Public REST-API

The Public API is an integration for reading engagement data out of Insight as well as updating the organizational structure directly. Unlike the HR integrations (which bring data in), the REST-API also lets you pull survey results, group structures, and engagement metrics into your own systems.

Common use cases:

- Display engagement data in BI dashboards (Power BI, Tableau, Looker)
- Build custom reports and exports
- Automate engagement monitoring and alerts
- Correlate engagement data with other business metrics

What you can access:

- Organization structure (groups and categories)
- Surveys and their status
- Aggregated survey results per group, index, and question
- Indexes and questions with localized names

5.5.5 Recommendations

Before starting direct integrations of organisational data, it's important to make sure that the source system can reflect the way results shall be presented and analysed. And that clear processes for managing the organisational structure are in place.

Things to consider:

- Team size – for employee surveys you might want to merge teams to avoid anonymity limitations in the results. Read more about anonymity in our help center: https://insight.brilliantfuture.se/en/exhelp/anonymity
- Primary/Secondary hierarchy – a powerful way of presenting different dimension of the result is to use primary/secondary organisational structure. This can be created using customer specific attributes. This needs to be reflected in the customer data using import files or direct integration.
- Background variables – consider if you want to use background variables and if these should be part of the survey or already in organisational data. Read more about background variables vs background questions in our help center: Bakground variables vs. background questions – Brilliant Helpcenter (brilliantinsights.se)

5.6 EMAIL DISTRIBUTION AND SECURITY

Insight uses email as one of the primary communication channels for survey invitations, reminders, notifications and reporting. To ensure scalability, reliability and secure delivery of outbound email communication, Brilliant uses SendGrid as a sub-processor and cloud-based email delivery platform.

The email architecture is designed to support high-volume transactional communication while maintaining security, authenticity and deliverability. Email messages generated by the Insight platform are transmitted securely to SendGrid through encrypted communication channels using TLS. SendGrid acts only as an outbound delivery service and processes email data according to contractual obligations and Brilliant's sub-processor management process.

The integration with SendGrid provides:

- Scalable delivery of survey invitations and reminders
- Delivery monitoring and bounce handling
- Retry mechanisms for temporary delivery failures
- Analytics related to communication status and delivery outcomes
- High availability and operational resilience for outbound email communication

To strengthen authenticity and protect recipients from email spoofing, phishing attempts and domain impersonation, Brilliant has implemented standard email authentication mechanisms for outbound survey communication:

5.6.1 SPF (Sender Policy Framework)

SPF is configured to explicitly define which mail servers are authorized to send email on behalf of the @brilliantinsights domain. Recipient mail systems can validate that messages originate from approved infrastructure and reject unauthorized sources.

5.6.2 DKIM (DomainKeys Identified Mail)

DKIM provides cryptographic signing of outbound email messages. Each email receives a digital signature associated with @brilliantinsights domain, allowing recipient systems to verify message authenticity and ensure that message content has not been modified during transmission.

5.6.3 DMARC (Domain-based Message Authentication, Reporting and Conformance)

DMARC builds upon SPF and DKIM by defining policies for how recipient systems should handle messages that fail authentication checks. DMARC also provides reporting mechanisms that improve visibility into unauthorized use of domains and attempted spoofing activities.

Together, SPF, DKIM and DMARC provide layered protection that improves email deliverability, reduce risk of phishing and spoofing as well as protecting integrity and authenticity of survey communication.

6 DATA ELEMENTS AND PROCESSING

Security and data integrity are of outmost importance to us at Brilliant Future. This section describes how we store data and additional security measures applied.

6.1 DATA TRANSFER AND STORAGE

The Insight application is hosted as a SaaS-application in Microsoft Azure. The underlying services (web apps, SQL server, Azure functions, Azure vaults) store data using resource groups in datacenters located in North Europe (Ireland), Sweden Central (Gävle/Sandviken/Staffanstorp), West Europe (Holland).

To further strengthen data integrity, we use following methods:

- **Data in transit** uses standard SSL/TLS/HTTPs with certificates stored separately using App Service Certificate in Azure
- **Data at rest** using SQL server and standard TDE encryption. Columns containing personal data in DB are using AES encryption. Encryption keys are stored separately using Azure Vaults.
- **Anonymization and pseudonymization** of respondents. For employee surveys (EX) it is of outmost importance that respondents are handled with full integrity so that answers cannot be derived to physical person. For EX all answers from respondents are anonymized in the UI and we use pseudonymization when storing data to the database. For customer surveys individuals are not anonymous in the UI, but data is still pseudonymized when stored to the database (data at rest).

6.2 DATA ELEMENTS

Below is a list of personal data stored in Insight and methods associated with securing data integrity.

Element	Purpose	Comment
FirstName, LastName, Email	Respondent information, roles managing organizations, surveys, etc	Encrypted using AES
UserParameters	Additional respondent information (e.g., background information, startdate, age, etc)	Anonymised
UserCredentials	For specific roles with access to Insight we store credentials separately with references to encrypted usersIDs	Anonymised

6.3

6.4 Secrecy, Privacy and AI

For Brilliant Future, privacy and integrity are major focuses. Our use of AI contributes to both an improved user experience and deeper insights about our customers and our customers' clients and employees, while also protecting personal data and individual privacy.

We utilize sub processors who are adhered to the EU-US Data Privacy Framework. For AI services, we have chosen to use Microsoft Azure OpenAI, which complies with EU regulatory requirements and ensures that our prompts:

- are NOT available to other customers.
- are NOT available to OpenAI.
- are NOT used to improve OpenAI models.
- are NOT used to improve any Microsoft or 3rd party products or services.
- are NOT used for automatically improving Azure OpenAI models for your use in your resource (The models are stateless, unless you explicitly fine-tune models with your training data).
- Models used are fine-tuned Azure OpenAI models and available exclusively for our use.

The Azure OpenAI Service is fully controlled by Microsoft; Microsoft hosts the OpenAI models in Microsoft's Azure environment and the Service does NOT interact with any services operated by OpenAI, e.g. ChatGPT, or the OpenAI API[1].

6.5 Risk with the use of AI

Brilliant Future works with close partners to continually evaluate the solution and its implications, for example in relation to the EU AI Act. Our use of AI falls within the definition of an AI system under that Act, but it does not fall into any high-risk or prohibited categories.

It is also important to note that the AI used by Brilliant does not train its own models, nor is it employed to assess individual persons, their behaviour, or performance.

Instead, our AI is used to deliver insights about organisations, its employees, its customers to give recommendations that enhance engagement and customer experience.

6.6 Risks combined with data storage and processing

Risk	Probability	Control
Foreign authority raises legal claim in the data and enforce it against the provider or gets lawful access by surveillance	Low	Security measures described in section 6.1 makes information useless and extremely hard to interpret, compare to other open solutions (linked-in, Instagram, facebook etc)
Company confidential information leakage caused by misuse of reports and data extracts from Insight	Medium	Avoid extracts / reports and use built in functionality in Insight instead
External security attack causes unlawful access to data in Insight	High	Web application firewall (WAF) and MS defender for cloud for continuous monitoring and scanning of traffic and resource

[1] https://learn.microsoft.com/en-us/legal/cognitive-services/openai/data-privacy

		Continuous development process for quick response and mitigation of risks Monitoring and quick incident management response Strong partnerships in operations, monitoring and security
Data breach caused by internal or external misuse of login information to Insight	High	Monitoring and quick incident management response Possibility to activate enhance security measures (e.g. SSO and MFA)

7 TECHNICAL AND ORGANISATIONAL MEASURES

Brilliant Future has an internal engineering team consisting of Architects, Tech leads, UX designers, and Product Managers. The requirement, discovery, design and development phases consider corporate and customer interests as well as quality-, legal-, security- and privacy compliance, referred to as “product governance”.

The development and delivery phase contain all necessary measures and check points to verify that all requirements are met (functional, non-functional). Regression- , feature- and security-tests are handled in the team manually but also automatically through the build pipeline. A close and daily collaboration with the support-team, the incident manager and operations team exist to monitor incidents, security alerts or breaches.

As a complement to our internal team Brilliant is using external partners for support, maintenance, monitoring, security, and auditing as well as consulting for specific expertise.

Brilliant Future works according to ISO 27001 and the Information Security Management System (ISMS) form controls around:

- Governance and organisational security measures
- Product governance and product development
- Technical Security Measures
- Risk Management
- Incident Management
- Sub-Processor and Supplier management

7.1 SOFTWARE DEVELOPMENT LIFECYCLE PROCESS (SDLC)

The purpose of the SDLC process is to ensure that all software developed and maintained by Brilliant Future AB is designed, built, tested and deployed securely, in compliance with legal, regulatory and contractual requirements and in alignment with industry best practise. That includes requirements (functional, non-functional, regulatory and legal) design, development, testing, deployment/release, and security

7.2 ROLES AND RESPONSIBILITIES

The software development lifecycle is driven by a cross-functional product and engineering team consisting of Product Managers, Tech leads, Developers, Architects, UX Designers, QA Engineers. The daily work is divided into separate cross functional teams (squads) with all roles included to full fill the end-to-end product delivery. Close and daily collaboration with the customer operations team and the incident manager exist for 2nd line support and to monitor any incidents, security alerts or breaches.

Chief Technology Officer (CTO)

- Owns overall technology strategy, security, and compliance in product development
- Approves architectural decisions and key technical investments
- Ensures SDLC aligns with corporate strategy, risk management, and regulatory requirements

Chief Product Officer (CPO)

- Defines product vision, strategy, and portfolio priorities
- Ensures alignment between product roadmap, customer needs, and company objectives

- Oversees product governance process together with CTO and Product Managers

Product Manager (PM)

- Owns the continuous discovery and design process
- Translates business goals and customer needs into clear product requirements
- Prioritizes backlog items and coordinates cross-functional input (UX, Tech Lead, stakeholders)
- Ensures privacy and security considerations are integrated into product requirements

UX Designer

- Designs user experiences that are intuitive, accessible, and consistent with brand standards
- Conducts user research, prototyping, and usability testing
- Collaborates with developers to ensure designs are feasible and user-friendly

Architect

- Designs and maintains technical architecture for scalability, performance, and security
- Participates in product governance and architecture forums
- Ensures adherence to coding standards, patterns, and secure design principles

Tech Lead

- Oversees technical delivery within the team, ensuring code quality and standards.
- Guides backlog refinement from a technical perspective.
- Mentors developers and coordinates with Architects and DevOps.
- Leads code reviews and resolves technical issues.

8 COMMON QUESTIONS REGARDING OPERATIONS, STORING AND PROCESSING OF PERSONAL DATA

Question	Answer	Comment
1. Brilliant shall ensure protection and privacy of Personal Data related to its services in accordance with relevant data proception legislation and regulations	Yes	Brilliant Future is working according to ISO 27001 and 27701. The aim is to reach official certification Our policies are documented and implemented according to our Information Security Management System (ISMS)
2. Brilliant shall ensure data transferred through sub-processors outside EU	Yes	Brilliant use Microsoft datacenters within EU (West Europe, Sweden Central). To ensure integrity of personal data Brilliant applies additional security methods, e.g. stored personal data elements encrypted using AES encryption and separated encryption keys (data at rest) Respondent data pseudonymization when storing data Sub-processors outside EU are certified according to the EU-US Data Privacy Framework (https://www.dataprivacyframework.gov/s/, n.d.)
3. What is the reason for using cloud services?	Brilliant Future has chosen to use Microsoft Azure to achieve high flexibility, scalability, and at the same time a high security level. Using cloud services is also part of our strategy for sustainability, where we achieve a more efficient and sustainable energy-consumption in the cloud as well as in a data center in Sweden that is powered by renewable energy (Microsoft's data center in Gävle, Sandviken, Staffanstorp)	
4. Personal Data shall be retained for only as long as necessary and handled with full integrity	Yes	Personal data is pseudonymized and encrypted. Anonymized data is used for benchmark purposes. Disposal of customer data is handled either contractual or at requests
5. Password policy and authentication methods	Password requirements is set to a minimum of 8 characters, a combination of lowercase, uppcase, alpha- and numeric characters. SSO supported via Azure AD. MFA supported via SSO	
6. Separated environments between development, test and production	Yes. The environment is managed by the internal team. We use external partners/experts to support in optimization, security and audits	
7. What is the purpose, location and legal mechanisms used through third party sub-processors	**Twilio/Sendgrid** SMS and email invitations and reminders to respondents Covered by and certified under the EU-US Data Privacy Framework (https://www.dataprivacyframework.gov/s/, u.d.). **Microsoft / Azure**	

	Services, applications, and operations in Azure/Cloud (e.g., App/Web services, Database/Storage, Functions, Azure OpenAI) Covered by and certified according to the EU-US Data Privacy Framework. (https://www.dataprivacyframework.gov/s/, n.d.) Only datacenters in Sweden and Western Europe /EU **Pendo (EU)** Used for building our help center and to provide customer support and analytics (no respondent data is transferred) Data processing through established DPA specifying terms for data handling and obligations under GDPR **Hubspot (EU)** Customer relationship management and customer support Covered by and certified under the EU-US Data Privacy Framework (https://www.dataprivacyframework.gov/s/, u.d.)	
8. Can Brilliant Future ensure secure processing with underlying partners (sub-processing)	Yes	We have ensured underlying sub-processes use same or equivalent security mechanisms to Brilliant Future. Sub-processors outside EU are certified according to the EU-US Data Privacy Framework (https://www.dataprivacyframework.gov/s/, n.d.) Only necessary information is passed to underlying partners as part of our design / privacy by design process
9. Can answers in surveys be derived to physical person?	No	We use mechanisms for pseudonymisation, meaning that answers are separated from respondents. Respondents name and email addresses are stored encrypted (data at rest) IP addresses from respondents are not stored. IP addresses from manager- and HR-roles in Insight are logged as part of user sessions.
10. Do Brilliant Future track respondents- and user sessions (e.g. TCP/IP addresses)	Yes/No	Brilliant Future only track specific roles (Managers and HR) in the platform. No respondent sessions are being tracked, logged or saved.
11. Are Brilliant working with an established Incident Management process covering security- and personal data related incidents?	Yes	Business critical incident get escalated to the Incident Team
12. High availability and SLA	Yes	Brilliant rely on Microsoft Azure general SLA of 99.9%. The automatic and continuous deployment process described in our SDLC process also secure high availability and security standards as well as rapid feature deployment. This gives an total SLA of **99.5%**

13. Scheduled maintenance or service-windows	No	Cloud and SaaS services allow high flexibility, availability and avoid need for planned maintenance/service windows
14. Does Brilliant have a Business Continuity Plan (BCP) and Disaster Recovery Plan in place	Yes	Brilliants internal infrastructure (office-network, internal workplace etc) is separated from our commercial platforms (e.g. Insight). Insight is a SaaS, IaaS solution that can easily be re-deployed in multiple locations, even local if necessary. Deployment-pipelines are fully automated. The environment has redundancy over multiple geographic locations.

8.1 REFERENCES

Further information about our policies and the Processing of Personal Data can be distributed on the demand and found in:

- Brilliant Future internal Privacy Policy
- Brilliant - General Information Security Policy
- Brilliant - Incident Management Process
- Brilliant – Risk Management Process
- Brilliant – Business Continuity Plan
- Brilliant – Software Development Lifecycle Process