



TRUSTe Independent GDPR Privacy Program Management Validation Findings Letter

Expiration date: June 18, 2027

To the Management of Lark Technologies

Scope

TRUSTe the Assurance division of TrustArc, Inc, has reviewed the privacy program-level measures of Lark Technologies ("Organization") as of June 18, 2026 against the 40 GDPR Privacy Program Management Validation Requirements (the "Validation Requirements") comprising the TRUSTe GDPR Privacy Program Management Compliance Validation. These Validation Requirements focus on program-level measures for demonstrating that the processing of personal information conducted by Lark Technologies is performed in adherence to the EU General Data Protection Regulation (GDPR).

The Validation Requirements cover the following 8 areas aligned with the **BUILD** and **DEMONSTRATE** Standards set forth in the TrustArc Privacy & Data Governance ("P&DG") Framework, for establishing, maintaining, and continually improving a GDPR-compliant privacy program aligned with the ISO 27001 International Standard for Information Security Management Systems:

1. **Integrated Governance**, including program governance, appointment of a privacy leader and/or a DPO
2. **Risk Management**, including privacy and security risks as well as privacy by design
3. **Resource Allocation**, including senior management engagement, privacy resources, competency and the role of the DPO
4. **Policies and Standards**, including establishment, communication and enforceability
5. **Processes**, including vendor management, records of data processing, legal basis of processing, incident management, DPIAs, complaint handling, individual rights management, international data transfers and consent management
6. **Awareness and Training**, including awareness of their obligations and sanctions for non-compliance as well as training on responsibilities
7. **Monitoring and Assurance**, including evaluation and audit of ongoing compliance
8. **Reporting and Certification**, including reporting on compliance to senior leadership and cooperation with regulatory authorities

Organization's Responsibilities

In connection with the Validation, Lark Technologies was responsible for providing information through a GDPR Validation Assessment regarding its privacy program-level measures and demonstrating with supporting evidence how it met the applicable Validation Requirements.

Responsibilities of TRUSTe

Our responsibility was to determine whether Lark Technologies' GDPR Privacy Program-level practices have met the Validation Requirements based on the information provided by the Organization. A member of our Assurance Services Team reviewed the GDPR Validation Assessment

submitted by the Organization according to the Validation Requirements. If any gaps were identified as needing remediation, the Organization was informed of the remediation necessary to be completed by the Organization prior to a final evaluation of whether the Validation Requirements have been sufficiently demonstrated by the Organization. After the Organization remediated any identified gaps and submitted the completed GDPR Validation Assessment, we reviewed the completed GDPR Validation Assessment in order to validate that the Organization has met the applicable Validation Requirements.

A validation review of the Organization's GDPR Privacy Program involves a comprehensive evaluation of program-level measures and evidence of those measures to ensure that the processing of personal information conducted by them, or by a third party processor on their behalf, is performed in adherence to GDPR and in alignment with ISO 27001 International Standard for Information Security Management Systems.

Inherent Limitations

Because of their nature and inherent limitations, program-level measures of the Organization may not always operate effectively to meet the applicable Validation Requirements

Furthermore, our findings herein are subject to the risk that the Privacy Program, or any component of the program-level measures, may change or that program-level measures implemented by the Organization may become ineffective or fail.

Findings

In our opinion, in all material respects, based on representations made by relevant personnel and supporting evidence of program-level measures identified in Lark Technologies' GDPR Validation Assessment:

- The applicable program-level measures as further described in the accompanying GDPR Validation Report have been implemented as of June 18, 2026.
- The measures described in the GDPR Validation Assessment were suitably designed to provide reasonable assurance that the Validation Requirements would be met if the program-level measures operated effectively as of June 18, 2026.

Restricted Use

This Findings Letter and the accompanying report is for the intended use of Lark Technologies as of June 18, 2026:

- This Findings Letter and the accompanying GDPR Validation Report, and any Summary, provided by TrustArc may be used by the Organization until the expiration date listed below.
- Only the Findings Letter and accompanying GDPR Validation Report represent the official validation determination of TRUSTe.
- Any modifications or alterations to the Findings Letter, the accompanying GDPR Validation Report, or any Summary, from the versions of those documents issued by TRUSTe shall render those documents invalid.
- Organizations must undergo a new GDPR Validation in order to make any representations whatsoever as being assessed against the Validation Requirements by TRUSTe, or any subsidiary or successor in interest to TrustArc, after the expiration date.
- This Findings Letter can be shared with the Organization's customers, contractors, and other stakeholders until the expiration date.
- This Findings Letter, the accompanying report, and any Summary provided by TRUSTe

may be published on the authorized corporate web site(s) of the Organization, as listed in the Annex to this Findings Letter.

- This Findings Letter expires on June 18, 2027.

This Findings letter and the accompanying report are not intended to be, and should not be used nor relied upon by anyone other than the Organization and, as determined in the sole discretion of the Organization, the Organization's customers, contractors and other permitted stakeholders.

ANNEX - Authorized Corporate Websites

https://www.larksuite.com/en_us/