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Tefincom S.A.

Independent Assurance Report on Tefincom S.A.'s NordVPN service as of 1 November 2018

to the Management of Tefincom S.A.

Independent Assurance Report

on Tefincom S.A.'s NordVPN service to the Management of Tefincom S.A. Nicosia, Cyprus

Initial situation and audit objectives

We have been engaged by Tefincom S.A. Nicosia, Cyprus (hereinafter and before “Tefincom S.A.”) to report that the no-log service “NordVPN” of Tefincom S.A. as described in appendix II (“the description”) is free of material misstatement at the time of our audit.

We performed our audit procedures between 29 October and 8 November 2018. We applied the criteria as outlined in Tefincom S.A.'s

statement in appendix I below.

Tefincom S.A.'s responsibilities

Tefincom S.A. is responsible for

- the selection and application of criteria as set out in appendix I;
- the preparation of the description in appendix II and the accompanying statement(s) in appendix I, including the completeness, accuracy and method of presentation of the description and the statement(s);
- the provision of the services covered by the description;
- the implementation and operation of the no-log service NordVPN in accordance with the criteria set out in appendix I.
- the design, implementation and maintenance of appropriate controls relating to the no-log service NordVPN;
- keeping adequate audit related records.

Independent auditor's responsibility

Our responsibility is to carry out an assurance audit and to issue a conclusion with reasonable assurance about Tefincom S.A.'s description in appendix II. We carried out our audit procedures with reasonable assurance in accordance with the International Standard on Assurance Engagements 3000 (revised) "Assurance Engagements Other than Audits or Reviews of Historical Financial Information" (ISAE 3000 (revised)). In accordance with this standard, we are required to meet professional and ethical standards and plan and carry out our audit in such a way as to achieve reasonable assurance about whether, in all material respects, the description is fairly presented and the service suitably designed and implemented as of 1 November 2018.

Taking into account risk and materiality considerations, we have carried out our audit procedures in such a way as to obtain sufficient suitable audit evidence. The audit procedures are chosen at the discretion of the independent service auditor.

In performing this audit, we have complied with the independence and other ethical requirements of the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants, which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and

professional behaviour.

In accordance with International Standard on Quality Control 1, PricewaterhouseCoopers AG maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Summary of audit procedures performed

We performed the following procedures, among others:

- Interview with responsible employees
- Observation of process to deploy configurations to VPN servers
- Inspection of relevant configurations for a sample of VPN servers
- Inspection of a sample of relevant configurations for all VPN servers
- Inspection of log files on a sample of VPN servers
- Inspection of relevant configuration on a sample of central infrastructure servers / services relevant for the NordVPN service
- Inspection of a sample of relevant configurations for all central infrastructure servers / services relevant for the NordVPN service
- Inspection of log files on a sample of central infrastructure servers / services relevant for the NordVPN service
- Inspection of databases on central databases relevant for the NordVPN service

We believe that the evidence we have obtained is sufficient and appropriate to provide our reasonable assurance conclusion.

Inherent limitations

Tefincom S.A. description is prepared to meet the common needs of a broad range of customers and their auditors and may not, therefore, include every aspect of the system that each individual customer may consider important in its own particular environment. Also, because of their nature, controls at a service organization, although present, may not prevent or detect and correct all errors or omissions in the areas of a no-log VPN service. Also, the projection to future periods of any evaluation of the fairness of the presentation of the description, or opinion about the suitability of the design or operating effectiveness of the controls to achieve the related control objectives is subject to the risk that controls at a service organization may become inadequate or

fail.

Furthermore, we have not assessed the following points, since these points were not in scope of our assurance engagement:

- security (confidentiality, integrity, and availability) of data
- NordVPN's non-regular VPN servers: double VPN servers, XOR-patched (obfuscated) servers, and tor node servers ¹

¹ Further information about these servers can be found on the website for the NordVPN service.

Restriction of use and disclosure of the report

We were engaged to report by Tefincom S.A. and, therefore, this report including the results of the audit are intended for the use of Tefincom S.A..

We permit the disclosure of this report by Tefincom S.A. in full only, to your existing customers and to your prospective customers, i.e. organisations that were not customers of you at the date of the issuance of or during the preceding year since the date of our report, to enable these parties to verify that a report by us as the independent practitioner has been commissioned by management and issued.

The report may not be used for any other purpose and may not be disclosed to third parties without our written agreement. We accept no responsibility or disclosure obligations towards third parties.

Conclusion

In our opinion, in all material aspects, based on criteria described in Tefincom S.A.'s statement in appendix I:

- a) the accompanying description fairly presents Tefincom S.A.'s no-log NordVPN service, and
- b) the NordVPN service is suitably designed and implemented as of 1 November 2018.

PricewaterhouseCoopers AG



Christopher Oehri



Marco Schurtenberger

Zürich, 20 November 2018

Appendix 1: Statement of Tefincom S.A. on the no-log NordVPN service

Tefincom S.A. has prepared the accompanying description for customers who use NordVPN service and the potential customers who have a sufficient understanding to consider the description, along with other information, including information about controls operated by customers of the system themselves. We confirm, to the best of our knowledge and belief, that:

- a. the accompanying description fairly presents our no-log NordVPN service. The criteria used in making this statement were that the accompanying description:
 - i. presents how “the no-log service” is designed and implemented, and
 - ii. does not omit or distort information relevant to the scope of the NordVPN service.

b. the NordVPN service is suitably designed and implemented as of 1 November 2018. The criteria used in making this statement were that:

- i. the NordVPN service is implemented as described in the description as of 1 November 2018, and
- ii. the no-log configuration as part of the operating model is defined and implemented on the VPN servers and the central infrastructure.

Kind regards,
Tefincom S.A.

20. November 2018



Marios Papaloizou
Director

Appendix II



NordVPN®

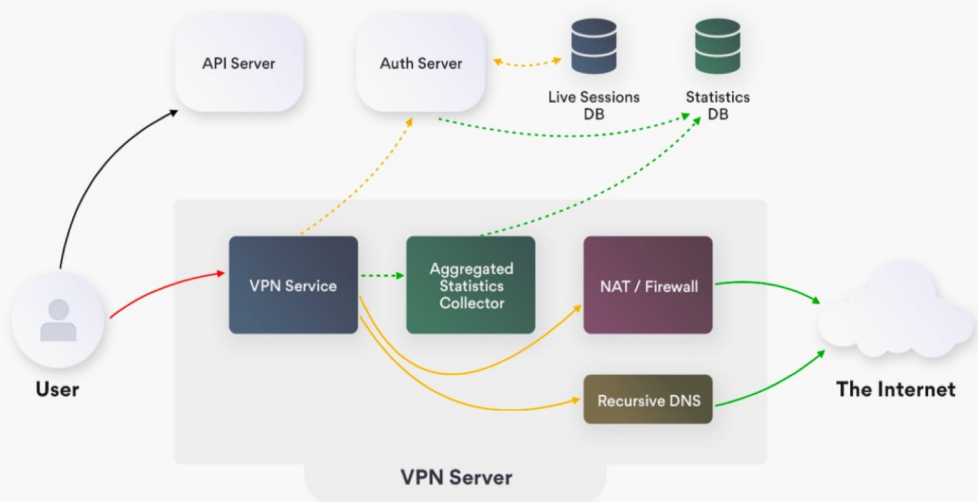
Service description

NordVPN is a robust virtual private network designed to enhance internet security and privacy. NordVPN is a no-log service, meaning that it does

not collect or store connection logs nor any individual personal activity data: IP addresses, traffic logs or Internet activity information. We process only minimal user information – only as much as it is absolutely necessary to maintain our services.

NordVPN has a complex internal structure; however, the simplified system functionality can be explained as follows:

1. The NordVPN service can be used through the NordVPN applications, browser proxy extensions (where in both cases communication with an API server is present) and through third-party software by configuring them manually.
2. In order to authenticate a user, the NordVPN authentication server verifies the user credentials, subscription status (checks whether the user is active or not) and whether the user has not reached the limit of concurrent active user session.
3. When a user connects to any NordVPN VPN server, all communication between the user and the server is encrypted.
4. Session information is periodically sent to the NordVPN authentication server for as long as the session is active. The information contains the username and the timestamp of the last session status. The aforementioned information is used to limit the amount of concurrent active user sessions and is deleted within 15 minutes after a session is terminated.
5. NordVPN authentication and VPN servers collect different anonymous, aggregated statistical information:
 - The authentication servers count the total number of all successful connections per user per month. However, they collect no information about the servers the user was connected to or the time of any of these connections.
 - The VPN servers collect the total number of all connected users and some system metrics (network traffic, CPU, memory and disk usage data, as well as running processes).
6. The NordVPN service decrypts users' traffic and routes it to the internet through the NAT/Firewall to keep the connection secure and to block any unsolicited traffic. The local Recursive DNS service is in use as it is required to provide our customers with additional security features like 'CyberSec' and 'SmartPlay'.



- User's traffic. VPN tunnel client -> server.
- User's traffic inside VPN server.
- Anonymized User's traffic.
- Various metadata. No User's traffic or data about User's traffic. Data about active VPN session until connected.
- Various metadata. No User's traffic or data about User's traffic. No data about User's present or past VPN connections.
- Requests to API. No User's traffic or data about User's traffic.

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