



## REPORT OF THE INDEPENDENT ACCOUNTANT

To the management of Starfield Technologies, LLC (“Starfield”):

We have examined Starfield, subsidiary of GoDaddy Inc. (“GoDaddy”), management’s [assertion](#) that for its Starfield and GoDaddy Certification Authority (“CA”) operations at Arizona and Virginia, in the United States of America, throughout the period July 1, 2019 to June 30, 2020 for its CAs as enumerated in [Attachment B](#), Starfield has:

- disclosed its business, key lifecycle management, certificate lifecycle management, and CA environmental control practices in the applicable versions of its Starfield Technologies, LLC Certificate Policy and Certification Practice Statement (“CP/CPS”) enumerated in [Attachment A](#)
- maintained effective controls to provide reasonable assurance that Starfield provides its services in accordance with its CP/CPS
- maintained effective controls to provide reasonable assurance that:
  - the integrity of keys and certificates it manages is established and protected throughout their lifecycles;
  - the integrity of subscriber keys and certificates it manages is established and protected throughout their lifecycles;
  - subscriber information is properly authenticated; and
  - subordinate CA certificate requests are accurate, authenticated, and approved
- maintained effective controls to provide reasonable assurance that:
  - logical and physical access to CA systems and data is restricted to authorized individuals;
  - the continuity of key and certificate management operations is maintained; and
  - CA systems development, maintenance, and operations are properly authorized and performed to maintain CA systems integrity

based on the [WebTrust Principles and Criteria for Certification Authorities v2.2](#). Starfield’s management is responsible for its assertion. Our responsibility is to express an opinion on management’s assertion, based on our examination.

The relative effectiveness and significance of specific controls at Starfield and their effect on assessments of control risk for subscribers and relying parties are dependent on their interaction with the controls and other factors present at individual subscriber and relying party locations. Our examination did not extend to controls at individual subscriber and relying party locations and we have not evaluated the effectiveness of such controls.

Starfield does not escrow its CA keys, does not provide subscriber key lifecycle management services, and does not provide certificate suspension services. Accordingly, our examination did not extend to controls that would address those criteria.



Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. Those standards require that we plan and perform the examination to obtain reasonable assurance about whether management’s assertion is fairly stated, in all material respects. An examination involves performing procedures to obtain evidence about management’s assertion. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risks of material misstatement of management’s assertion, whether due to fraud or error. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

Because of the nature and inherent limitations of controls, Starfield’s ability to meet the aforementioned criteria may be affected. For example, controls may not prevent, or detect and correct, error, fraud, unauthorized access to systems and information, or failure to comply with internal and external policies or requirements. Also, the projection of any conclusions based on our findings to future periods is subject to the risk that changes may alter the validity of such conclusions.

In our opinion, management’s assertion, as referred to above, is fairly stated, in all material respects.

Without modifying our opinion, we noted the following other matter during our procedures:

Matter	Topic	Matter
1	CRL Publication	Starfield disclosed in <a href="#">Mozilla Bug #1645832</a> that during system upgrades, a CRL publishing node was taken down and not properly brought up again. During the system upgrade, monitoring alarms were suppressed and the issue was not discovered until after the existing CRLs expired.

This report does not include any representation as to the quality of Starfield’s services other than its CA operations at Arizona and Virginia, in the United States of America, nor the suitability of any of Starfield’s services for any customer’s intended purpose.

The World Health Organization classified the COVID-19 outbreak as a pandemic in March 2020. Based on the rapid increase in exposure globally, the gravity or length of the impact of the COVID-19 outbreak cannot be estimated at this time.

Starfield’s use of the WebTrust for Certification Authorities Seal constitutes a symbolic representation of the contents of this report and it is not intended, nor should it be construed, to update this report or provide any additional assurance.

*BDO USA, LLP*

August 6, 2020



**ATTACHMENT A - CERTIFICATION PRACTICE STATEMENT AND CERTIFICATE POLICY VERSIONS IN-SCOPE**

Policy Name	Policy Version	Policy Date
<a href="#">Starfield Technologies, LLC Certificate Policy and Certification Practice Statement</a>	Version 4.4	June 19, 2020
Starfield Technologies, LLC Certificate Policy and Certification Practice Statement	Version 4.3	May 26, 2020
Starfield Technologies, LLC Certificate Policy and Certification Practice Statement	Version 4.2	March 27, 2020
Starfield Technologies, LLC Certificate Policy and Certification Practice Statement	Version 4.1	May 21, 2019



## ATTACHMENT B - IN-SCOPE CAs

Root CAs			
Subject	SHA2 Thumbprint	Valid From	Valid To
OU = Go Daddy Class 2 Certification Authority O = The Go Daddy Group, Inc. C = US	C3846BF24B9E93CA64274C0EC67C1ECC5E024FFCACD2D74019350E81FE546AE4	6/29/2004	6/29/2034
CN = Go Daddy Root Certificate Authority - G2 O = GoDaddy.com, Inc. L = Scottsdale S = Arizona C = US	45140B3247EB9CC8C5B4F0D7B53091F73292089E6E5A63E2749DD3ACA9198EDA	9/1/2009	12/31/2037
OU = Starfield Class 2 Certification Authority O = Starfield Technologies, Inc. C = US	1465FA205397B876FAA6F0A9958E5590E40FCC7FAA4FB7C2C8677521FB5FB658	6/29/2004	6/29/2034
CN = Starfield Root Certificate Authority - G2 O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	2CE1CB0BF9D2F9E102993FBE215152C3B2DD0CABDE1C68E5319B839154DBB7F5	9/1/2009	12/31/2037
CN = Starfield Services Root Certificate OU = <a href="http://certificates.starfieldtech.com/repository/">http://certificates.starfieldtech.com/repository/</a> O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	B5BD2CB79CBD1907298D6BDF4842E516D8C78FA6FC96D25F71AF814E16CC245E	6/2/2008	12/31/2029



Cross-Signed Roots			
Subject	SHA2 Thumbprint	Valid From	Valid To
CN = Go Daddy Root Certificate Authority - G2 O = GoDaddy.com, Inc. L = Scottsdale S = Arizona C = US	3A2FBE92891E57FE05D57087F48E730F17E5A5F53EF403D618E5B74D7A7E6ECB	1/1/2014	5/30/2031
CN = Go Daddy Root Certificate Authority - G2 OU = <a href="https://certs.godaddy.com/repository/">https://certs.godaddy.com/repository/</a> O = GoDaddy.com, Inc. L = Scottsdale S = Arizona C = US	9BF58967545996194512DB6177151AFE99706AEA3DA36FEEE7AD9F8B3C0507CB	5/3/2011	5/3/2031
CN = Starfield Root Certificate Authority - G2 O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	9F43D52E808C20AFF69E02FAAC205AAC684E6975213D6620FAC64BDE5FCAB4BC	1/1/2014	5/30/2031
CN = Starfield Root Certificate Authority - G2 OU = <a href="https://certs.starfieldtech.com/repository/">https://certs.starfieldtech.com/repository/</a> O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	454040E4969070401CC35BDF7F2A4EBCE5797BB7694AE731D93A8115FD59929C	5/3/2011	5/3/2031
CN = Starfield Services Root Certificate Authority - G2 O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	EB159C922A3FC2191475CA20A53816D87A38A1A79A7264789193D2F1F750E85E	1/1/2014	5/30/2031
CN = Starfield Services Root Certificate Authority - G2 OU = <a href="https://certs.starfieldtech.com/repository/">https://certs.starfieldtech.com/repository/</a> O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	A24B9440F9FCBEBB48C274C03DE7D24C5ED1CA59D2D362F29ED3B457762C75BB	5/3/2011	5/30/2031



Cross-Signed Roots			
Subject	SHA2 Thumbprint	Valid From	Valid To
CN = Starfield Services Root Certificate Authority - G2 O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	2D12B619A660CEFB013271831D891213FC434E982A21568256CF4E2E86324BEA	8/30/2009	6/28/2034
CN = Starfield Services Root Certificate Authority - G2 O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	28689B30E4C306AAB53B027B29E36AD6DD1DCF4B953994482CA84BDC1ECAC996	9/2/2009	6/28/2034



Intermediate CAs			
Subject	SHA2 Thumbprint	Valid From	Valid To
serialNumber = 07969287 CN = Go Daddy Secure Certification Authority OU = http://certificates.godaddy.com/repository O = GoDaddy.com, Inc. L = Scottsdale S = Arizona C = US	09ED6E991FC3273D8FEA317D339C02041861973549CFA6E1558F411F11211AA3	11/16/2006	11/16/2026
CN = Go Daddy Secure Certificate Authority - G2 OU = http://certs.godaddy.com/repository/ O = GoDaddy.com, Inc. L = Scottsdale S = Arizona C = US	973A41276FFD01E027A2AAD49E34C37846D3E976FF6A620B6712E33832041AA6	5/3/2011	5/3/2031
CN = Go Daddy Secure Code Signing Certificate Authority - G2 OU = http://certs.godaddy.com/repository/ O = GoDaddy.com, LLC L = Scottsdale C = US	EF356CC299AA637916C81A48891B5BA2F333A2064D93A89BA14F63A14AA6B251	4/1/2014	4/1/2034
CN = Go Daddy Secure Extended Validation Code Signing CA - G2 O = GoDaddy Inc. L = Scottsdale S = Arizona C = US	9EFC910271094B886BD9A8FC9E394DBF2AE514778CB373544085AF815CABFE2D	5/1/2015	5/1/2035
serialNumber = 10688435 CN = Starfield Secure Certification Authority OU = http://certificates.starfieldtech.com/repository O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	05A6DB389391DF92E0BE93FDFA4DB1E3CF53903918B8D9D85A9C396CB55DF030	11/16/2006	11/16/2026
CN = Starfield Secure Certificate Authority - G2 OU = http://certs.starfieldtech.com/repository/ O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	93A07898D89B2CCA166BA6F1F8A14138CE43828E491B831926BC8247D391CC72	5/3/2011	5/3/2031



Intermediate CAs			
Subject	SHA2 Thumbprint	Valid From	Valid To
CN = Starfield Secure Code Signing Certificate Authority - G2 OU = <a href="http://certs.starfieldtech.com/repository/">http://certs.starfieldtech.com/repository/</a> O = Starfield Technologies, LLC S = Arizona C = US	26CFA206753E96AED7C30F5674E7C6F5A0CB2F93837AF6A1596C2F799C725385	4/1/2014	4/1/2034
CN = Starfield Secure Extended Validation Code Signing CA - G2 O = Starfield Technologies, LLC L = Scottsdale S = Arizona C = US	F41A694B3825942DB89523E9775F997DB9FA2998398DC39A74B72670DACFD468	5/1/2015	5/1/2035





Timestamping CAs			
Subject	SHA2 Thumbprint	Valid From	Valid To
CN = Starfield Timestamp Authority - G2 O = Starfield Technologies, LLC L = Scottsdale S = Arizona C = US	5E9223124187AC792056A8CFBDD23E643CD774DB8431A914D4FCFA1CD4B3A353	4/15/2019	4/15/2024
CN = Starfield Timestamp Authority - G2 O = Starfield Technologies, LLC L = Scottsdale S = Arizona C = US	0EA223D9132909B625DDDC6C94FB85AFDED0A20DCFF55B7E65BFECF1411386AC	9/7/2019	9/17/2024



Starfield Technologies, LLC  
14455 N Hayden Road  
Scottsdale, Arizona 85260

Starfield Technologies, LLC (“Starfield”), subsidiary of GoDaddy Inc. (“GoDaddy”), operates the Starfield and GoDaddy Certification Authority (“CA”) services for the CAs enumerated in [Attachment B](#), and provides the following CA services:

- Subscriber registration
- Certificate renewal
- Certificate rekey
- Certificate issuance
- Certificate distribution
- Certificate revocation
- Certificate validation
- Subordinate CA certification and cross-certification

The management of Starfield is responsible for establishing and maintaining effective controls over its CA operations, including its CA business practices disclosure on its [repository](#), CA business practices management, CA environmental controls, CA key lifecycle management controls, certificate lifecycle management controls, and subordinate CA certificate lifecycle management controls. These controls contain monitoring mechanisms, and actions are taken to correct deficiencies identified.

There are inherent limitations in any controls, including the possibility of human error, and the circumvention or overriding of controls. Accordingly, even effective controls can only provide reasonable assurance with respect to Starfield’s CA operations. Furthermore, because of changes in conditions, the effectiveness of controls may vary over time.

Starfield management has assessed its disclosures of its certificate practices and controls over its CA services. Based on that assessment, in Starfield management’s opinion, in providing its CA services at Arizona and Virginia, in the United States of America, throughout the period July 1, 2019 to June 30, 2020, Starfield has:

- disclosed its business, key lifecycle management, certificate lifecycle management, and CA environment control practices in the applicable versions of its Starfield Technologies, LLC Certificate Policy and Certification Practice Statement (“CP/CPS”) enumerated in [Attachment A](#)
- maintained effective controls to provide reasonable assurance that Starfield provides its services in accordance with its CP/CPS
- maintained effective controls to provide reasonable assurance that:
  - the integrity of keys and certificates it manages is established and protected throughout their lifecycles;

- the integrity of subscriber keys and certificates it manages is established and protected throughout their lifecycles;
- subscriber information is properly authenticated; and
- subordinate CA certificate requests are accurate, authenticated, and approved
- maintained effective controls to provide reasonable assurance that:
  - logical and physical access to CA systems and data is restricted to authorized individuals;
  - the continuity of key and certificate management operations is maintained; and
  - CA systems development, maintenance, and operations are properly authorized and performed to maintain CA systems integrity

based on the [WebTrust Principles and Criteria for Certification Authorities v2.2](#), including the following:

#### **CA Business Practices Disclosure**

- Certification Practice Statement (CPS)
- Certificate Policy (CP)

#### **CA Business Practices Management**

- Certification Practice Statement Management
- Certificate Policy Management

#### **CA Environmental Controls**

- Security Management
- Asset Classification and Management
- Personnel Security
- Physical and Environmental Security
- Operations Management
- System Access Management
- System Development, Maintenance, and Change Management
- Disaster Recovery, Backups, and Business Continuity Management
- Monitoring and Compliance
- Audit Logging

#### **CA Key Lifecycle Management Controls**

- CA Key Generation
- CA Key Storage, Backup, and Recovery
- CA Public Key Distribution
- CA Key Usage
- CA Key Archival
- CA Key Destruction
- CA Key Compromise
- CA Cryptographic Hardware Lifecycle Management
- CA Key Transportation
- CA Key Migration


### Certificate Lifecycle Management Controls

- Subscriber Registration
- Certificate Renewal
- Certificate Rekey
- Certificate Issuance
- Certificate Distribution
- Certificate Revocation
- Certificate Validation

### Subordinate CA and Cross Certificate Lifecycle Management Controls

- Subordinate CA Certificate and Cross Certificate Lifecycle Management

Starfield does not escrow its CA keys, does not provide subscriber key lifecycle management services, and does not provide certificate suspension services. Accordingly, our assertion does not extend to controls that would address those criteria.

DocuSigned by:  
  
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Todd Redfoot  
Chief Privacy & Risk Officer  
Starfield Technologies, LLC

August 6, 2020

**ATTACHMENT A - CERTIFICATION PRACTICE STATEMENT AND CERTIFICATE POLICY  
VERSIONS IN-SCOPE**

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Root CAs			
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OU = Go Daddy Class 2 Certification Authority O = The Go Daddy Group, Inc. C = US	C3846BF24B9E93CA64274C0EC67C1ECC5E024FFCACD2D74019350E81FE546AE4	6/29/2004	6/29/2034
CN = Go Daddy Root Certificate Authority - G2 O = GoDaddy.com, Inc. L = Scottsdale S = Arizona C = US	45140B3247EB9CC8C5B4F0D7B53091F73292089E6E5A63E2749DD3ACA9198EDA	9/1/2009	12/31/2037
OU = Starfield Class 2 Certification Authority O = Starfield Technologies, Inc. C = US	1465FA205397B876FAA6F0A9958E5590E40FCC7FAA4FB7C2C8677521FB5FB658	6/29/2004	6/29/2034
CN = Starfield Root Certificate Authority - G2 O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	2CE1CB0BF9D2F9E102993FBE215152C3B2DD0CABDE1C68E5319B839154DBB7F5	9/1/2009	12/31/2037
CN = Starfield Services Root Certificate OU = <a href="http://certificates.starfieldtech.com/repository/">http://certificates.starfieldtech.com/repository/</a> O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	B5BD2CB79CBD1907298D6BDF4842E516D8C78FA6FC96D25F71AF814E16CC245E	6/2/2008	12/31/2029

Cross-Signed Roots			
Subject	SHA2 Thumbprint	Valid From	Valid To
CN = Go Daddy Root Certificate Authority - G2 O = GoDaddy.com, Inc. L = Scottsdale S = Arizona C = US	3A2FBE92891E57FE05D57087F48E730F17E5A5F53EF403D618E5B74D7A7E6ECB	1/1/2014	5/30/2031
CN = Go Daddy Root Certificate Authority - G2 OU = https://certs.godaddy.com/repository/ O = GoDaddy.com, Inc. L = Scottsdale S = Arizona C = US	9BF58967545996194512DB6177151AFE99706AEA3DA36FEEE7AD9F8B3C0507CB	5/3/2011	5/3/2031
CN = Starfield Root Certificate Authority - G2 O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	9F43D52E808C20AFF69E02FAAC205AAC684E6975213D6620FAC64BDE5FCAB4BC	1/1/2014	5/30/2031
CN = Starfield Root Certificate Authority - G2 OU = https://certs.starfieldtech.com/repository/ O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	454040E4969070401CC35BDF7F2A4EBCE5797BB7694AE731D93A8115FD59929C	5/3/2011	5/3/2031
CN = Starfield Services Root Certificate Authority - G2 O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	EB159C922A3FC2191475CA20A53816D87A38A1A79A7264789193D2F1F750E85E	1/1/2014	5/30/2031
CN = Starfield Services Root Certificate Authority - G2 OU = https://certs.starfieldtech.com/repository/ O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	A24B9440F9FCBEBB48C274C03DE7D24C5ED1CA59D2D362F29ED3B457762C75BB	5/3/2011	5/30/2031
CN = Starfield Services Root Certificate Authority - G2 O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	2D12B619A660CEFB013271831D891213FC434E982A21568256CF4E2E86324BEA	8/30/2009	6/28/2034

Cross-Signed Roots			
Subject	SHA2 Thumbprint	Valid From	Valid To
CN = Starfield Services Root Certificate Authority - G2 O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	28689B30E4C306AAB53B027B29E36AD6DD1DCF4B953994482CA84BDC1ECAC996	9/2/2009	6/28/2034



Intermediate CAs			
Subject	SHA2 Thumbprint	Valid From	Valid To
serialNumber = 07969287 CN = Go Daddy Secure Certification Authority OU = http://certificates.godaddy.com/repository O = GoDaddy.com, Inc. L = Scottsdale S = Arizona C = US	09ED6E991FC3273D8FEA317D339C02041861973549CFA6E1558F411F11211AA3	11/16/2006	11/16/2026
CN = Go Daddy Secure Certificate Authority - G2 OU = http://certs.godaddy.com/repository/ O = GoDaddy.com, Inc. L = Scottsdale S = Arizona C = US	973A41276FFD01E027A2AAD49E34C37846D3E976FF6A620B6712E33832041AA6	5/3/2011	5/3/2031
CN = Go Daddy Secure Code Signing Certificate Authority - G2 OU = http://certs.godaddy.com/repository/ O = GoDaddy.com, LLC L = Scottsdale C = US	EF356CC299AA637916C81A48891B5BA2F333A2064D93A89BA14F63A14AA6B251	4/1/2014	4/1/2034
CN = Go Daddy Secure Extended Validation Code Signing CA - G2 O = GoDaddy Inc. L = Scottsdale S = Arizona C = US	9EFC910271094B886BD9A8FC9E394DBF2AE514778CB373544085AF815CABFE2D	5/1/2015	5/1/2035
serialNumber = 10688435 CN = Starfield Secure Certification Authority OU = http://certificates.starfieldtech.com/repository O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	05A6DB389391DF92E0BE93FDFA4DB1E3CF53903918B8D9D85A9C396CB55DF030	11/16/2006	11/16/2026
CN = Starfield Secure Certificate Authority - G2 OU = http://certs.starfieldtech.com/repository/ O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	93A07898D89B2CCA166BA6F1F8A14138CE43828E491B831926BC8247D391CC72	5/3/2011	5/3/2031

Intermediate CAs			
Subject	SHA2 Thumbprint	Valid From	Valid To
CN = Starfield Secure Code Signing Certificate Authority - G2 OU = <a href="http://certs.starfieldtech.com/repository/">http://certs.starfieldtech.com/repository/</a> O = Starfield Technologies, LLC S = Arizona C = US	26CFA206753E96AED7C30F5674E7C6F5A0CB2F93837AF6A1596C2F799C725385	4/1/2014	4/1/2034
CN = Starfield Secure Extended Validation Code Signing CA - G2 O = Starfield Technologies, LLC L = Scottsdale S = Arizona C = US	F41A694B3825942DB89523E9775F997DB9FA2998398DC39A74B72670DACFD468	5/1/2015	5/1/2035

Timestamping CAs			
Subject	SHA2 Thumbprint	Valid From	Valid To
CN = Starfield Timestamp Authority - G2 O = Starfield Technologies, LLC L = Scottsdale S = Arizona C = US	5E9223124187AC792056A8CFBDD23E643CD774DB8431A914D4FCFA1CD4B3A353	4/15/2019	4/15/2024
CN = Starfield Timestamp Authority - G2 O = Starfield Technologies, LLC L = Scottsdale S = Arizona C = US	0EA223D9132909B625DDDC6C94FB85AFDED0A20DCFF55B7E65BFECF1411386AC	9/7/2019	9/17/2024