Compliance drift report, September 2026: 35 of the top 2,000 vendors carry a lapsed PCI DSS row, BAA coverage and registry mix across 7,301 vendors

Figures as of 30 Sep 2026. Generated 3 Oct 2026. Closed month; figures are frozen.

This report reads the CertReports index as of 30 Sep 2026: 13,399 public evidence rows across 7,301 B2B software vendors, drawn from 10 sources. It measures drift: how much public compliance evidence lapsed, how old it is, and how coverage differs by framework and category. Every figure below is computed from stored rows, dated, and reproducible.

2.2% of evidence rows are past their date (301 of 13,399 rows)

0% of DPF listings linked to vendors have lapsed (0 lapsed, 1,622 active)

1.8% of the top 2,000 vendors carry a lapsed PCI DSS row (35 of 1,981 vendors by demand rank)

Lapse rates by framework

A row lapses when its own evidence says so: a certificate expiry, a report period plus twelve months, a registry usage end date, a registry validation date plus twelve months, or a dated registry withdrawal. Active rows are verified or stated rows whose date has not passed. Registry records marked inactive that carry no date at all (3,461 rows, almost all historical Data Privacy Framework and Privacy Shield participants) are counted separately and left out of every lapse share, because they describe the list's history rather than drift in the period.

Framework	Active rows	Lapsed rows	Lapse share	Expiring in 90 days	Inactive, undated	Sources
EU-US Data Privacy Framework	1,622	0	0.0%	352	3,457	dpf
PCI DSS	3,564	301	7.8%	848	0	custom, drata, vanta, visa_grsp, wolfia
SOC 2	803	0	0.0%	0	2	csa_star, custom, drata, soc3, vanta, wolfia
FedRAMP	759	0	0.0%	0	0	custom, drata, fedramp, vanta, wolfia
CSA STAR	513	0	0.0%	0	0	csa_star, custom, drata, vanta, wolfia
GDPR	471	0	0.0%	0	0	custom, drata, vanta, wolfia
ISO/IEC 27001	466	0	0.0%	0	0	csa_star, custom, drata, vanta, wolfia
CCPA / CPRA	285	0	0.0%	0	0	custom, drata, vanta, wolfia
HIPAA	231	0	0.0%	0	0	custom, drata, vanta, wolfia
SOC 3	103	0	0.0%	0	2	custom, drata, soc3, vanta, wolfia

ISO/IEC 27701	98	0	0.0%	0	0	custom, drata, vanta, wolfia
ISO/IEC 27017	97	0	0.0%	0	0	custom, drata, vanta, wolfia
SOC 1	95	0	0.0%	0	0	custom, drata, vanta, wolfia
ISO/IEC 27018	89	0	0.0%	0	0	custom, drata, vanta, wolfia
ISO/IEC 42001	83	0	0.0%	0	0	drata, vanta, wolfia
Cyber Essentials	70	0	0.0%	0	0	custom, drata, vanta, wolfia
TX-RAMP	69	0	0.0%	0	0	drata, vanta, wolfia
Cyber Essentials Plus	38	0	0.0%	0	0	drata, vanta
IRAP	31	0	0.0%	0	0	drata, vanta, wolfia
GovRAMP	26	0	0.0%	0	0	drata, vanta
BSI C5	22	0	0.0%	0	0	drata, wolfia
ISO 22301	22	0	0.0%	0	0	drata, vanta
TISAX	21	0	0.0%	0	0	drata, vanta, wolfia
HITRUST	19	0	0.0%	0	0	drata, vanta
ENS	14	0	0.0%	0	0	drata, vanta
DORA critical ICT provider designation	10	0	0.0%	0	0	dora_ctpp
ISO 9001	7	0	0.0%	0	0	vanta

Lapse share is lapsed divided by active plus lapsed, as of 30 Sep 2026. Inactive, undated registry records are excluded from the share.

Lapsed rows by framework



The top 2,000 vendors

The 2,000 highest-demand vendors in the catalogue (1,981 active) are the ones most reviews touch. This table asks a narrower question than the one above: how many of them carry at least one lapsed row per framework.

Framework	Top-2,000 vendors with a row	With a lapsed row	Share of the top 2,000
EU-US Data Privacy Framework	1,019	0	0.0%
PCI DSS	296	35	1.8%
SOC 2	273	0	0.0%
FedRAMP	246	0	0.0%
CSA STAR	219	0	0.0%
ISO/IEC 27001	204	0	0.0%
GDPR	186	0	0.0%

CCPA / CPRA	135	0	0.0%
HIPAA	106	0	0.0%
ISO/IEC 27017	59	0	0.0%
ISO/IEC 27018	56	0	0.0%
ISO/IEC 27701	54	0	0.0%
SOC 3	53	0	0.0%
ISO/IEC 42001	48	0	0.0%
SOC 1	43	0	0.0%
Cyber Essentials	37	0	0.0%
TX-RAMP	36	0	0.0%
Cyber Essentials Plus	21	0	0.0%
IRAP	20	0	0.0%
BSI C5	16	0	0.0%
GovRAMP	16	0	0.0%
TISAX	14	0	0.0%
ENS	11	0	0.0%
HITRUST	10	0	0.0%
ISO 22301	8	0	0.0%
DORA critical ICT provider designation	6	0	0.0%
ISO 9001	5	0	0.0%
ISMAP	3	0	0.0%
HDS	2	0	0.0%
NHS DSPT	2	0	0.0%

Evidence age

Days between the capture date of each row and 30 Sep 2026. Registries are re-read nightly, so registry rows stay young; vendor-stated rows age until the page is captured again.

Framework	Rows	Median age (days)	90th percentile (days)
EU-US Data Privacy Framework	5,079	1	1
PCI DSS	3,803	1	13
FedRAMP	711	0	0
SOC 2	623	9	9
CSA STAR	467	1	1
GDPR	358	9	9
ISO/IEC 27001	343	9	9

CCPA / CPRA	191	9	9
HIPAA	165	9	9
SOC 1	60	9	9
ISO/IEC 27701	56	9	9
ISO/IEC 27017	48	9	9
ISO/IEC 42001	47	9	9
ISO/IEC 27018	43	9	9
Cyber Essentials	40	9	9
TX-RAMP	34	9	9
SOC 3	33	9	9
Cyber Essentials Plus	19	9	9
ISO 22301	13	9	9
IRAP	13	9	9
GovRAMP	10	9	9
DORA critical ICT provider designation	10	1	1

HIPAA BAA coverage by category

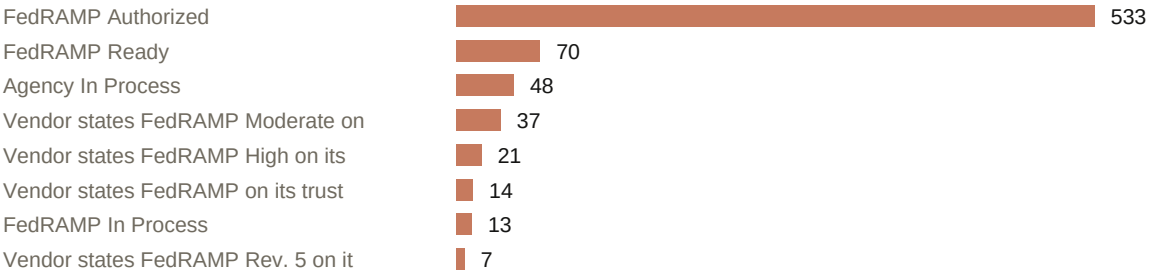
Share of indexable vendors in each category with a public business associate agreement offer. There is no HIPAA certification; the offer is the public artefact.

Category	Indexable vendors	With a public BAA offer	Coverage
Developer tools	218	23	10.6%
AI tools	93	23	24.7%
Data platforms	65	13	20.0%
Analytics	265	10	3.8%
Compliance and GRC	165	9	5.5%
Security	161	8	5.0%
Healthcare	89	8	9.0%
Communications and CPaaS	40	8	20.0%
AI infrastructure	32	8	25.0%
Customer support	102	7	6.9%
Cloud and hosting	142	6	4.2%
Project management	48	6	12.5%
AI assistants	25	6	24.0%
No-code and automation	110	5	4.5%
Identity and access	74	5	6.8%

FedRAMP status mix

Statuses as published in the Marketplace data file at the last sync, plus vendor-stated rows from trust centres. Under the Consolidated Rules for 2026 the official label is "FedRAMP Certified"; rows carry the text the file published.

FedRAMP rows by published status



Data Privacy Framework usage end

1,622 Active DPF listings linked to vendors

0 Past their usage end date (0.0% of active plus lapsed)

352 Usage end dates in the next 90 days

3,457 Inactive listings with no usage end date (historical participants, excluded from the lapse share)

Drift index

The drift index is the number of rows that lapsed or were removed in a month per 1,000 active rows. It is the time series behind the change log; the first observed month is September 2026, when the index went live, so the series is short and will lengthen with each report.

Month	Added	Renewed	Lapsed	Removed	Other events	Drift per 1,000 active rows
2026-09	2561	371	50	53	10581	10.7

Change events in the current series



Events in the period

Event type	Count
vendor indexed	6,912
subprocessor added	2,754
attestation added	2,561
auditor changed	551
attestation renewed	371
dpa changed	192
trust center moved	78
attestation removed	53
attestation expired	50
state changed	48
ai training policy changed	26
subprocessor removed	13

Trust reports behind the numbers

No high-demand vendor's evidence lapsed in September 2026. These are the highest-demand vendors with evidence due to lapse within 90 days of 30 Sep 2026. Each card is read live from the index, so it shows any renewal captured after the report was generated; the caption keeps the fact the report counted.

Intercom · Trust report

Intercom: DPF due to lapse 14 Nov 2026.

Public evidence as of 2 Nov 2026. https://certreports.com/vendors/intercom/security

• DPF: Verified, Valid to 14 Nov 2026 (as of 2 Nov 2026)
• HIPAA: Vendor-stated, Badge only, BAA not captured (as of 30 Sep 2026)
• SOC 2: Vendor-stated, Trust centre (as of 30 Sep 2026)
• GDPR: Vendor-stated, Trust centre (as of 30 Sep 2026)
• ISO 27001: Vendor-stated, Trust centre (as of 30 Sep 2026)
• CSA STAR: Vendor-stated, Trust centre (as of 30 Sep 2026)
• ISO 27701: Vendor-stated, Trust centre (as of 30 Sep 2026)
• ISO 42001: Vendor-stated, Trust centre (as of 30 Sep 2026)
• ISO 27018: Vendor-stated, Trust centre (as of 30 Sep 2026)
• 2 more on the evidence page

Documents: Subprocessor list (Public); Privacy policy (Public)
Security practices: Penetration testing (annual)
Subprocessors: 14 named, including Ably, Amazon Web Services, Inc., Anthropic, PBC, Cartesia AI, Inc., Cloudflare, Inc.

Tenable · Trust report

Tenable: DPF due to lapse 4 Nov 2026.

Public evidence as of 2 Nov 2026. https://certreports.com/vendors/tenable/security

• DPF: Expired, Listing inactive (as of 2 Nov 2026)
• FedRAMP: Verified, Moderate impact (as of 2 Nov 2026)
• CSA STAR: Verified, CSA STAR registry (as of 26 Oct 2026)

Blink · Trust report

Blink: DPF due to lapse 24 Nov 2026.

Public evidence as of 2 Nov 2026. https://certreports.com/vendors/blink-joinblink/security

• DPF: Verified, Valid to 24 Nov 2026 (as of 2 Nov 2026)
• HIPAA: Vendor-stated, Badge only, BAA not captured (as of 30 Sep 2026)
• SOC 2: Vendor-stated, Trust centre (as of 30 Sep 2026)
• GDPR: Vendor-stated, Trust centre (as of 30 Sep 2026)
• ISO 27001: Vendor-stated, Trust centre (as of 30 Sep 2026)
• Cyber Essentials: Vendor-stated, Trust centre (as of 30 Sep 2026)

Documents: Subprocessor list (Public); Privacy policy (Public); Public trust centre documents (Blink ISO 27001 certificate 2026; Cyber Essentials PLUS Certificate; DSPT Certificate; Blink ISO 27001 certificate 2025; Blink ICO Registration Certificate)
Security practices: Penetration testing (annual)
Subprocessors: 9 named, including Amazon Web Services, Apple, AppsFlyer, Hubspot, Intercom

Method and sources

• Registry rows: FedRAMP Marketplace data file, Data Privacy Framework participant list, Visa Global Registry of Service Providers, CSA STAR registry, mirrored nightly.
• Vendor-stated rows: trust centres and security pages captured with a content hash and capture date.
• Lapse: expiry date, period end plus twelve months, usage end date, validation date plus twelve months, or withdrawal.
• Top 2,000: vendors ranked by demand in the CertReports catalogue.
• Drift index: (lapsed + removed) in the month divided by active rows at generation, per 1,000.
• Generated 1 Oct 2026. Figures for a closed month are frozen when the month ends; the current month is refreshed daily.

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