

# Information on ICT Infrastructure Jurisdiction and Safeguards Against Unauthorized Access

Information pursuant to Article 28(1) of the Data Act Regulation (EU) 2023/2854

## Jurisdiction of ICT infrastructure used for data processing

- Country: Republic of Poland (European Union)
- Region: Greater Poland Voivodeship, Central Poland
- City: Poznań
- Legal jurisdiction: Polish law
- Regulatory supervision:
  - Office of Electronic Communications (UKE) - telecommunications regulations,
  - Personal Data Protection Office (UODO) - personal data protection (GDPR),
  - CSIRT NASK - cybersecurity (National Cybersecurity System),
  - Ministry of Digitalization - coordination of cybersecurity policy.

## Safeguards against unauthorized access by government administrations to data stored in the EU

### Legal provisions:

- GDPR: implementation of personal data protection requirements.
- Electronic communications law: protection of telecommunications secrecy.
- Electronic Services Act: protection of personal data of natural persons using electronically provided services
- DORA: application of digital operational resilience requirements for ICT service providers in the financial sector.

### Information protection certificates and standards:

- ISO/IEC 27001:2022.
- Legal procedures: required legal basis for any data access in accordance with GDPR, required court consent for data access within proceedings, access by state authorities requires legal basis and is subject to judicial control.
- ANSI/TIA-942 Rated 4 (regarding Data Center 2), EN 50600 Class 4 (regarding Data Center 2), PCI DSS, SOC 2.

### Data sovereignty:

- Data location: data stored on Polish territory.
- No capital connections: no direct connections with entities outside the EU that could influence data access.
- Applicable law: exclusive application of Polish and EU law.

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Register **Share Capital:** 24 766 300,00 PLN