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MyEDPO

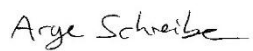
AllCloud Data Protection Process Summary

AllCloud Inc., together with its affiliates AllCloud BSD Ltd., AllCloud Platform Ltd., AllCloud Business Applications Ltd., AllCloud Germany GmbH, AllCloud Romania S.R.L. ("AllCloud"), and its professional and managed cloud services, have undertaken an extensive data protection program and a review to ensure compliance with the EU's General Data Protection Regulation ("GDPR"), California Consumer Privacy Act ("CCPA") and other applicable data protection and privacy laws.

AllCloud is a Data Processor (service provider) in relation to the personal data of clients, to the extent processed through its services. AllCloud has taken many steps to ensure that it meets and exceeds all the obligations of data processor under GDPR, CCPA and applicable laws. AllCloud has ensured implementation of a number of organizational, technical and security processes in this regard. Among other steps taken, AllCloud has:

1. Appointed a Data Protection Officer to ensure it is able to respond to all data protection compliance needs.
2. Amended its data protection policy in compliance with GDPR, CCPA and other laws and posted it on its website (www.allcloud.io/privacy-policy/).
3. Undertaken a thorough security review, led by its Chief Information Security Officer, to ensure data security, including MFA for access to company systems, and group policies.
4. Trained all staff dealing with personal data on data protection.
5. Commenced a vendor data protection management program, including putting in place Data Processing Agreements with all relevant vendors.
6. Updated its data breach response procedure to include reporting and notification obligations and trained the AllCloud data security team.
7. Reviewed international transfers of personal data, including ensuring EU personal data does not leave the EU unless without appropriate safeguards.
8. Established Records of Processing.
9. Adopted a Data Subject Access Request plan, to ensure professional and timely responses to any data subject requests.
10. Ensured its general practices are done in line with applicable data protection and security laws, in particular GDPR, CCPA and others.

AllCloud has been thorough in its data protection compliance program, and we are pleased to confirm that as of the date above, AllCloud is, to our knowledge, in substantive compliance with applicable data protection laws. For any further questions or elaborations, please contact AllCloud's Data Protection team at dpo@allcloud.io.



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