Peter Grätz
Data Protection Officer

Audit Statement

Company	Cloudiax AG
Street	
City	
Date	23.01.2023

Based on Art. 32 1/d GDPR ‚ Security of processing ' I, Peter Grätz, have executed an audit on the below mentioned topics to verify any shortcomings concerning processes, tools and behaviour of employees in the focus of data protection and security as well as give guidance on the implementation of appropriate measures to identify and mitigate any risks related to the processing of personal data.

Management Summary:

CEO	Dirk Cyrener, Cloudiax AG
	Felix Gembler, Cloudiax AG
Auditor	Peter Grätz, ext. cert. GDPR Expert
Result	Within the 2023 audit all issues from previous investigations have been largely addressed. There were minor issues found in this audit and I recognised that the TOMs need to be reflecting the change of organisation (remote office work). The audit statement is: **passed.**

Extract of GDPR §32:
The likelihood and severity of the risk to the rights and freedoms of the data subject should be determined by reference to the nature, scope, context and purposes of the processing.
Risk should be evaluated on the basis of an objective assessment and implement appropriate technical and organisational measures as appropriate to …

- the pseudonymisation and encryption of personal data

- the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services

- the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident

- a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing

based on Cloudiax AG, „Technical and organisational measures ', in the current version 9, I have conducted by the method of 'remote' inspection, interviews of coordinator and employees, checking of relevant documents an audit on the current technical and organisational operation. The documentation of Cloudiax AG has been provided by chapters 1 thru 6 which are based on the given structure of GDPR §32 (see above).

TOM Art. 32 GDPR	chapter	evaluation & remarks
Admission Control Data Centre	1.1 – 1.2	Passed; ISO27001 cert. evaluated, up-to-date
Admission Control Business Centre	1.3	Passed;
Access Control PCs & Servers	1.4	Passed;
Segregation	1.5	Passed;
Pseudonymisation	1.6	Passed;

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Integration control	2.1 & 2.2	Passed; improved backup implemented
Availability control	3.1	Passed; new Data Recovery / Emergency Plan available
Data Protection Management System	4.1	Passed;
Incident-Response Management	4.2	Passed; new Filter method for Data protection & security with separated process; separate Evaluation PS951 in September
Pre-condition control	4.4	Passed;
Operations Control - outsourcing	4.4	Passed:
Documentation & Revision	6	Passed;

I hereby witness that the operation and applications provide todays state of the art security for the purpose of processing personal data as well as the intention of the management to do there outmost to implement appropriate technical and organisational measures to ensure a level of security to mitigate any risk to data loss or manipulation.

Emmerich am Rhein, 23.01.2023

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