

Independent Service Auditor's Assurance Report on the Description datacenters Facilities of Data4 Services and the Suitability of the Design and Operating Effectiveness of Controls for the Period from January 1, 2023 through December 31, 2023

Type II report following ISAE 3402 standard



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### I. Independent Service Auditor's Assurance Report

#### To the Management of Data4 Services

#### Scope

We have examined Data4 Services (the "Company") description of its datacenters Facilities activities (the "Description" or "System") throughout the period from January 1, 2023 through December 31, 2023 ("Specified Period"), and the suitability of design and operating effectiveness of controls to achieve the related control objectives stated in the Description.

#### Data4 Services Responsibilities

In Section III of this report, Data4 Services has provided an assertion about the fairness of the presentation of the Description and suitability of the design and operating effectiveness of the controls to achieve the related control objectives stated in the Description.

Data4 Services is responsible for preparing the Description and for the accompanying assertion, including the completeness, accuracy, and method of presentation of the Description and the assertion, providing the services covered by the Description, specifying the control objectives and stating them in the Description, identifying the risks that threaten the achievement of the control objectives, selecting the criteria, and designing, implementing, and documenting controls to achieve the related control objectives stated in the Description.

#### Service Auditor's Responsibilities

Our responsibility is to express an opinion on the fairness of the presentation of the Description and on the suitability of the design and operating effectiveness of the controls to achieve the related control objectives stated in the Description, based on our examination. We conducted our examination (assurance engagement) in accordance with the International Standard on Assurance Engagements 3402, "Assurance Reports on Controls at a Service Organization," issued by the International Auditing and Assurance Standards Board. Those standards require that we comply with ethical requirements and plan and perform our examination to obtain reasonable assurance about whether, in all material respects, the description is fairly presented, and the controls were suitably designed and operating effectively to achieve the related control objectives stated in the Description throughout the Specified Period.

An examination of a description of a service organization's system and the suitability of the design and operating effectiveness of the service organization's controls to achieve the related control objectives stated in the description involves performing procedures to obtain evidence about the fairness of the presentation of the description and the suitability of the design and operating effectiveness of those controls to achieve the related control objectives stated in the description. Our procedures included assessing the risks that the Description is not fairly presented and that the controls were not suitably designed or operating effectively to achieve the related control objectives stated in the Description.

Our procedures also included testing the operating effectiveness of those controls that we consider necessary to provide reasonable assurance that the related control objectives stated in the Description were achieved. An examination engagement of this type also includes evaluating the overall presentation of the Description and the suitability of the control objectives stated therein, and the suitability of the criteria specified by the Company and described in Section II and III of the report. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

#### Limitations of Controls at a Service Organization

Data4 Services's Description is prepared to meet the common needs of a broad range of customers and their auditors and may not, therefore, include every aspect of the System that each individual customer may consider important in its own environment. Also, because of their nature, controls at the Company may not prevent, or detect and correct, all errors or omissions as part of its colocation services. Also, the projection to the future of any evaluation of the fairness of the presentation of the Description, or conclusions about the suitability of the design or operating effectiveness of the controls

This report is intended solely for the information and use of Data4, customers of Data4 Hosting services, and the independent auditors of such customers.

to achieve the related control objectives is subject to the risk that controls at Data4 Services may become inadequate or fail.

#### Subservice Organization

The Company don't rely upon subservices organizations, located in Cornaredo, Italy, to host in its datacenters client infrastructures. The Description in Section III of this report includes only the controls and related control objectives of the Company and for the organization providing datacenters's colocations services. Our examination did not extend to the controls of a subservice organization.

#### Opinion

In our opinion, in all material respects, based on the criteria described in Data4 Services's assertion in Section II of this report:

- (a) The Description fairly presents the datacenters Facilities of Data4 Services that was designed and implemented throughout the specified period;
- (b) The controls related to the control objectives stated in the Description were suitably designed to provide reasonable assurance that the control objectives would be achieved if the controls operated effectively throughout the Specified Period; and
- (c) The controls tested, which were those necessary to provide reasonable assurance that the control objectives stated in the description were achieved, operated effectively throughout the Specified Period (except from some identified exceptions, mentioned in section IV of this report).

#### Description of Tests of Controls

The specific controls tested, and the nature, timing and results of those tests are listed in Section IV of this report.

#### Intended Users and Purpose

This report, including the description of tests of controls and results thereof in Section IV of this report is intended solely for the information and use of Data4 Services, user entities ("customers") of Data4 Services's datacenters Facilities during some or all of the Specified Period, and the independent auditors of such customers, who have a sufficient understanding to consider it, along with other information, including information about controls implemented and operated by customers themselves, when assessing the risks of material misstatements of customer's financial statements. The report is not intended to be and should not be used by anyone other than these specified parties.

Neuilly-sur-Seine, April 23, 2024

Alexis GRIN, Partner,

Cyril BROGNIART, Partner,

For Grant Thornton France French Member Firm of Grant Thornton International

### II. Management's Assertions

The accompanying description has been prepared for clients who have used the Data4 Services's (the "Company") datacenters Facilities and their auditors who have sufficient understanding to consider the description, along with other information, including information about controls operated by user entities ("clients") themselves, when obtaining an understanding of clients' information systems relevant to financial reporting. Data4 Services S.A. confirms that:

(a) The accompanying description in Section III fairly presents Data4 Services datacenters Facilities and the related tests of operating effectiveness for the period from January 1, 2023 through December 31, 2023 ("Specified Period"). The criteria used in making this assertion were that the accompanying description:

(i) Presents how the system was designed and implemented, including:

- The types of services provided, including, as appropriate, classes of transactions processed.
- The procedures, within both information technology and manual systems by which those transactions are initiated, authorized, recorded, processed, corrected as necessary, and transferred to reports for the clients.
- How the system dealt with significant events and conditions, other than transactions.
- The process used to prepare reports for customers.
- Controls that we assumed, in the design of the system, would be implemented by user entities, and which, if necessary, to achieve control objectives stated in the accompanying description, are identified in the description along with the specific control objectives that cannot be achieved by Data4 Services alone.
- Other aspects of the Company's control environment, risk assessment process, information system systems (including related business processes) and communication, control activities, and monitoring controls were relevant to the processing and reporting client transactions.

(ii) Does not omit or distort information relevant to the scope of datacenters Facilities being described, while acknowledging that the description is prepared to meet the common needs of a broad range of clients of the services and their auditors, and may not, therefore, include every aspect of datacenters Facilities that each individual client of the services and its auditor may consider important in its own particular environment.

(b) The controls related to the control objectives stated in the accompanying description were suitably designed and operated effectively throughout the Specified Period. The criteria we used in making this assertion were that:

(i) The risks that threatened achievement of the control objectives stated in the description were identified by Data4 Services;

(ii) The identified controls would, if operating as described, provide reasonable assurance that those risks would not prevent the control objectives stated in the description from being achieved; and

(iii) The controls were consistently applied as designed, including whether manual controls were applied by individuals who have the appropriate competence and authority.

(c) Due to our confidentiality clause, prohibiting us from disclosing confidential and strategic corporate information, documentation of applied controls has not been transmitted to auditors for archiving and traceability purposes. It has been consulted in our offices on the Cornaredo site.

Paris, April 23, 2024 Jean-Paul Leglaive Head of QHSE, Data4 Services

jean-paul leglaive

### III. Management's Description of Infrastructures and Controls

### A. Scope and Purpose of the Report

This document describes Data4 Services. (the "Company") datacenters Facilities provided to its customers by its datacenters Facilities team throughout the period of January 1, 2023 through December 31, 2023 ("Specified Period") and assess the suitability the of design and operating effectiveness of controls to achieve the related controls objectives stated in the description.

The description of Data4 Services is limited to access control and security devices installed in the datacenters Facilities to ensure that the client facilities are suitably exploited.

Data4 Services Management is responsible for the identification of the control objectives and for the manual and systembased control policies and procedures to achieve those objectives. This report is intended solely for the information and user of Data4 Services, user entities ("customers") of colocation services, and the independent auditors of such customers, who have a sufficient understanding to consider it, along with other information, including information about controls implemented and operated by customers themselves, when assessing the risks of material misstatements of customer's financial statements. The report is not intended to be and should not be used by anyone other than these specified parties.

Controls described in this report are applicable to datacenters managed in Italy by Data4 Services for all its clients. The scope of this report includes 2 datacenters facilities in operation:

- 1 building "design "Y" (DC06);
- 1 building "design " L' " (DC07).

The report was prepared according to the guidance contained in the International Standard on Assurance Engagements ("ISAE") standard No. 3402, "Assurance Reports on Controls at a Service Organization", issued by the International Auditing and Assurance Standards Board.

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### B. Data4 Group presentation

#### 1 European datacenters operator

Data4 Services is a European data center specialist which currently operates 36 datacenters in Paris, Milan (Cornaredo), Madrid (Alcobendas), Warsaw and Luxembourg:

- 36 datacenters built (+ 19 additional constructible buildings)
- 850 MW total power capacity
- 165 hectares total land capacity
- 159,47 MW Total IT Space capacity
- Certified datacenters

### 2 European strategic sites

The Data4 Services' sites have state of the art datacenters, Hyper-connected infrastructures and DRP in Paris – Dual site 7 km fibers away. They are in a secure location, without any environmental, social or transport risk. Close to the heart of Paris, Milan, Madrid, Warsaw & Luxembourg.

#### Energy

Since 2018, equivalent of 100% of consumption produced from Renewal Energy Sources.

#### Compliance

Data4 Services has implemented an Integrated System Management (ISM) at double level:

- Multi-ISO standards (9001, 14001, 27001, 45001, 50001) for datacenters
- Multi-sites

To better cover customers 'needs for quality of services, security, legal & regulatory compliance, environmental & energy performance. This approach is part of continuous improvement strategy of Data4 Services.

#### **ISO Certifications**

The International Organization for Standardization (ISO) is the largest organization in the world for the creation and publication of international standards. The ISO certification signifies that Data4 Services can offer products and services which meet or exceed its clients' specifications, by implementing quality, safety, health, environmental protection and energy management standards, in their widest possible sense for the IT sector.

- ISO 9001: 2015 (Marcoussis, Dual Building, Cornaredo, Alcobendas) Activity Certified: development and commercialization of secured IT hosting of IT infrastructure and maintenance in operational conditions of datacenters infrastructures Starting date of the certification: 2<sup>nd</sup> March 2022 End of the current cycle: 17<sup>th</sup> February 2025
- ISO 27001: 2013 (Marcoussis, Dual Building, Cornaredo, Alcobendas) Activity Certified: Information security management system for hosting of IT infrastructure Starting date of the certification: 17 january 2022 End of the current cycle: 02 February 2025
- ISO 45001: 2018 (Marcoussis, Dual Building, Cornaredo, Alcobendas) Activity certified: development and commercialization of secured IT hosting of IT infrastructure and maintenance in operational conditions of datacenters infrastructures Starting of the certification: 12<sup>th</sup> January 2022 End of the current cycle: 06<sup>th</sup> March 2025

- ISO 14001: 2015 (Marcoussis, Dual Building, Cornaredo, Alcobendas) Activity certified: development and commercialization of secured IT hosting of IT infrastructure and maintenance in operational conditions of datacenters infrastructures Starting date of the certification: 2<sup>nd</sup> March 2022 End of the current cycle: 17<sup>th</sup> February 2025
- ISO 50001: 2018 (Marcoussis, Dual Building, Cornaredo) Activity certified: developmment et commercialization de solutions d'hebergement informatique securise et maintien en condition operationnelle des infrastructures datacenters Starting of the certification: 10<sup>th</sup> March 2022 End of the current cycle: 09<sup>th</sup> March 2025

#### Risk assessment

As part of its integrated management system, Data4 Services has implemented a Business Risks assessment initiative beginning of 2016. Through workshops with Data4 Services management following a Top-Down approach, Data4 Services has identified its business risks leading to consider major risks (internal and external). These risks have been quoted and for each one an associated action plan has been developed for managing the security information risks but also the environmental, energy, health and safety risks (pollution, flood, earthquake, social movement, forest fire, physical safety problem, monitoring unavailability, weather unavailability, network failure etc.).

The management system of Data4 Services is in line with the requirements for the **development and commercialization** of secured IT hosting of IT infrastructure and maintenance in operational conditions of datacenters infrastructures.

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### C. Infrastructure description on Cornaredo in Milan

The site of Cornaredo is composed by 8 datacenters in operation with power capacity of 66 MW, 3 buildings "design X",1 building design Y, 3 buildings "design Y" and 1 buildings "design L".

#### Site access Buildings

Cornaredo site is divided in 3 different areas before access to computer rooms:

#### 1. Campus zone

- Security check: Limited access by badge (permanent or temporary)
- Safety grid around the zone's perimeter.
- CCTV controls
- Access by unipersonal airlock (human or vehicle)

#### 2. DC zone

- Security check: Limited access by badge (permanent or temporary)
- CCTV controls
- o The perimeter of the zone is also protected (grid / anti-crossing system electronics)

#### 3. DC building within DC zone

- o Limited access by unipersonal airlock and badge, at each DC building.
- o Badge control system to access shared spaces and computer rooms.
- The technical rooms in the datacenters are accessible with keys managed and controlled by a secure electronic safe (with a password login).

All datacenters are divided into several blocks with dedicated spaces and shared spaces according to the contractual relationship defined with the customer. Biometric systems are used at the request of customers.

#### Prevention/detection device

- Fire detection and HSSD (High Sensitivity Smoke Detection facilities)
- Humidity sensors ambiance (atmospheric)
- Temperature sensors Atmos and returned air
- Public spaces are covered by CCTV, and for private spaces (customers) is on demand.

#### Air conditioning/cooling systems

Air conditioning facilities have N+1 or N+2 level of redundancy. The air conditioning devices and infrastructures are located outside the servers/customers' rooms - but inside the building, in the technical corridors.

#### Fire protection

Fire detection installed in all different room. Extinguishing system deployed following "FM Global" recommendation. (Genset room, IT space, Some of the technical room).

- Smoke exhaust system installed for all different spaces, with capacity calculation online with the volume of the space.
- Characteristics of the wall, depending of the space, have an appropriate fire resistance.
- Genset and batteries rooms is 2 hours fire resistant. IT room are 2-hour fire resistant.

#### Flood

For building equipped with chilled water system, there is no piping into technical rooms. All water loop located into the corridors, where are installed the CraC units. Roof and floors are all watertight. Technical corridors are equipped with a trap to collect water and evacuate directly to used water network.

#### Fire extinguishing system

Fire extinguishing system installed depending on the type of room. IT space all equipped.

Extinguishing system are fully programmed and automated following "FM Global" recommendation.

- DCs "design X" are equipped with Nitrogen.
- DCs "design Y & L" are equipped with Fog.

#### Main Power Supply High Voltage

- High Voltage Supply in Cornaredo: 2 dedicated & direct underground electrical feeds in 132 kV directly connected to Terna and ENEL substation: 2 x 2 substation with High Voltage.
- Transformers which step down the power from 132 kV in 15 KV
- different loops of 15 kV that feed each datacenters through 2 different ways
- the DC01 only is feeded from a MV (15kV) Enel substation.

#### Redundancy and UPS (Uninterrupted Power Supply)

Double feed at transformer level. Switchboard are doubled and paired with each other. For all IT space, UPS installed with batteries. Autonomy of the batteries is calculated to provide 10 Minutes full load. Each chain of UPS and batteries are in a separated room. All IT Rooms are powered by via two different chains of UPS

#### Power generator

All building equipped with generators:

- Diesel engine for boat.
  - Building "design X" is N+1 (2.500 kVA x 3 or x 4)
  - o Building "design Y L" is N+1 (2.500 kVA x 3 or x 4)
  - o Building "design L" has 2.650 KW x 8
- The autonomy for each DC is 72 hours minimum at full load (100.000 or more liters in 2 or more tanks)

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### 1 BUILDING "DESIGN X": Infrastructure description DC01/DC02/DC03

### Design (Capacity 1,28 to 2 kW/sq.m)

- Building divided into 2 blocks (A & B)
- 4 x 280 sqm + 4 x 290 sqm of IT rooms for customers on 2 floors (2.280 m<sup>2</sup> IT space)

#### POWER - 2N Distribution

- Per block 2 redundant electrical chains
- 4 x 2 Transformers of 1.600 kVA each
- 4 x ( 4 or 5) UPS per bloc (2.000 or 2.500 kVA)

#### Centralized Backup at the building level

- 3 or 4 Generators backup (2.500 kVA each) N+1
- 2 or 4 tanks for Fuel (100.000 l in total)

#### Cooling

- 8 or 10 chillers (603 kWf each)
- 4 CRAH per room (250 kWf each)

#### **Fire Protection**

- Double interlock pre-action Nitrogen
- Overhead smoke detection & HSSD

#### Architecture's basic presentation

2N

2N

N+2 at building level

N+2 at room level

72 hours autonomy minimum at full load



#### BUILDING "DESIGN Y": Infrastructure description (DC04) 2

#### Modular Design (Capacity 1,5kW/sq.m)

- 2.000 sq.m of IT rooms on 1 floor and divided into 2 main data halls of 1.000 sq.m each. •
- Technical rooms located at the back of the building on 2 levels. •
- Each technical function is isolated in a dedicated room •

#### POWER - Shared distribution 3N/2

- Principle: power is shared on 3 chains but 2 chains can take the full load •
- 2 Transformers per Chain of UPS (2.000 kVAa) 2N N+2
- 3 chain of UPS- 6 UPS per chain (4.500 kVA)

#### Power backup at the building level

• 3 stand-by Generators back-up (2.500 kVA each) N+1• 2 tanks for Fuel (50.000 l each) 72 hours autonomy minimum at full load

#### Cooling

Per Datahall/IT Room: •

•	10 AHU per room (225 kWf each) DIRECT FREE COOLING	N+2
•	(20 Air Handling Unit)	N+4

#### **Fire Protection**

- Double interlock pre-action Water Mist system •
- Overhead smoke detection & HSSD

#### Architecture's basic presentation



### 3 BUILDING "DESIGN Y'": Infrastructure description (DC05/DC06/DC10)

#### Modular Design (Capacity 2,0 kW/sq.m)

- 2.000 sq.m of IT rooms on 1 floor and divided into 2 main data halls of 1.000 sq.m each.
- Technical rooms located at the back of the building on 2 levels.
- Each technical function is isolated in a dedicated room

#### **POWER – Shared distribution 3 + 1**

- Principle: power is shared on 4 chains but 2 chains can take the full load
- 1 transformer per Chain of UPS (2.750 Kva)
- 4 chain of UPS 6 UPS (6 x 250 kVA) per chain (4 x 1,5 MVA total) N+1

#### Power backup at the building level

- 4 stand-by Generators back-up (2.500 kA each)
  - or 4 tanks for Fuel (100000 l in total) 72 hours autonomy minimum at full load

#### Cooling

- Per Datahall/IT Room:
- 10 AHU per room (250 KWf each) FREE COOLING INDIRECT N+2

#### **Fire Protection**

- Double interlock pre-action Water Mist system
- Overhead smoke detection & HSSD

#### Architecture's basic presentation

N+1

N+1



### 4 <u>BUILDING "DESIGN L' ": Infrastructure description (DC07)</u>

#### Modular Design (Capacity 2.5 kW / sq.m)

- 4000 sq.m of IT rooms on 2 floor and divided into 4 main datahalls of 1.000 sq.m each.
- Technical rooms located at the edges of the building on 2 levels.
- Each technical function is isolated in a dedicated room

#### POWER - Shared distribution 8 chains

- Principle: power is shared on 8 chains
- 1 transformer per Chain of UPS (2.900 kVA)
- 8 chain of UPS 4 UPS (4 x 500 KW) per chain (8 x 2MW total) N+2

#### Power backup at the building level

- 8 stand-by Generators back-up (3.250 kWA each)
- 8 tanks for Fuel (40.000 l each) 72 hours autonomy minimum at full load

#### Cooling

- Per Datahall/IT Room:
- 12 Fan walls per room 250 kWf each (2.000 kWf/2.670 kWf per room) FREE COOLING INDIRECT N+2

#### **Fire Protection**

- Double interlock pre-action Water Mist system
- Overhead smoke detection & HSSD

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### D. Information System/applications in use

Data4 Services uses several tools as part of its activities, namely for the most important:

- **CWP portal**, the access request management tool allowing the company's customers to formalize requests to create, modify and delete access assigned to their environments.
- **CMMS** (Computerized Maintenance Management System), all devices (environmental protection and food) of buildings are covered by a multi-year maintenance schedule:
  - o 2000 equipment referenced per building.
  - Preventive maintenance programmed for 12 months.
    - BMS: A building management system (BMS) solution is deployed in each building/data center. This system is responsible for managing (supervising) equipment managing air conditioning, energy or fire warning systems. If these platforms are autonomous to know that they are not dependent on each other, they are resilient within the same building (doubled) and the data collected by them are centralized to be made available in time to the teams in charge the operation and maintenance of datacenters (FOC or Facility Operations Center) installed near the teams in charge of safety and security of the Cornaredo campus.

## PORTAIL CLIENT ou CWP (1/9)

Page d'authentification du portail client (ou « Customer Web Portal »)



#### E. Datacenters operations and environmental controls

#### Physical Security

The data center facilities are secured using a computerized proximity card-access system. The proximity card-access control system is used where access is controlled by time of day, day of week, and according activity's justification. Additionally, the security system provides a record of entry, thus providing an audit of activity at the controlled doors, both perimeter and interior.

The access system controls electronic locks on both interior and exterior doors. The electronic locks on doors are active 24/7. Additionally, the facility is equipped with CCTV and a 24/7, third-party security service. Security guards monitor building entrances and one guard tours the premises regularly.

Guards monitor h24 the system and details any events that occurs. If an incident occurs, the guard will raise a ticket on our Jira system and complete an Incident Report. The supervisor of security with a Data FM

Access controls are installed for exterior and interior doors, where needed. The proximity card-access control system is used so approved access is controlled by time of day, day of week and job function. The system also provides a history trail of access by card number and access point.

CCTV is deployed within the data center area and at strategic points throughout the building, floor or wing. CCTV also provides identification for cross-reference with the proximity access system of site movements.

Visitors are required to hand a piece of identity to the site. Visitors may receive a badge accordingly to the policy reported in the "Data4 Italy sicurezza degli accessi fisici v1.6" document.

The access system logs personnel who enter an interior or exterior door on a real-time basis. The security department will monitor the system logs for exceptions. Data4 managers review access lists of individuals with physical access to datacenters at least annually to verify access to the site and to internal server rooms.

Access to the client computer rooms is managed, through the customer portal (CWP), by the client administrators declared to Data4 Services. Within the scope of responsibility of access to rooms delegated to the client, the administrators appointed by the customers are responsible for creating, modifying, or revoking access for their staff but also for their suppliers, partners or third parties (such as their own clients). Authorization reviews (access rights) are manageable by Data4 Services customers via the customer portal and accesses (activity logs) that can be fully communicated to the customer upon request to Data4 Services. The review of these accesses is very often integrated into service steering meetings organized very regularly with a large majority of our clients, always at their request.

#### Access Security management

A physical environment suitable to protect IT equipment and people from man-made and natural hazards has been established by the installation of environmental and physical controls that are regularly reviewed for their proper function.

Control procedures include identification of personnel and visitors, access to facilities, environmental threat protection, physical security and personnel safety.

Data4 Services's Managers team examine and approve personnel access to datacenters and core rooms.

Also, Data4 Services's clients have in charge to performs regularly a user access badges for environment access managed under their responsibility.

With the access control system, the badges (permanent and temporary) are defined automatically or manually according to the form of the request (via the CWP web portal or the email). When the request is made on the CWP web portal or by email, Data4 Services ensures that the access configuration of the badge is consistent with the choices and environments defined.

#### Environmental controls

The datacenters are equipped for the provision of power from the local/national power company; this supply is backed up by the on-site generator(s) designed to provide emergency power to hosted systems. The power is distributed via automatic transfer switches (ATSs), UPS systems and multiple power distribution units (PDUs).

The data center areas are supported by environmental systems (cooling and heating) that provide for a controlled environment to predefined parameters depending on the type, shape and model of the hosted equipment. The system consists of multiple air-handling units (AHUs) and includes redundancy to cover system failures or extreme conditions.

The facilities' infrastructures include power, power distribution and environmental controls for temperature and humidity, plus fire detection and suppression systems, which are monitored by Technical team 24/7.

#### Monitoring

Control center is managing and supervising the campus 24/7 in term of security and facility.

The monitoring equipment is located on-site but is monitored via a remote location on site. The monitoring systems provide alerts when the management thresholds are exceeded.

Each of the two teams (security and technical) log and report events where a threshold has been exceeded or an alert identified. The event are dispatched to a predetermined list of employees or a maintenance company. Dispatches are either by telephone, email or text.

The responsible employee be responsible for monitoring progress for the duration of the fault and for invoking escalations as required.

#### Fire Detection and Suppression

Each of the data center's generation and server rooms are equipped with fire detection and suppression equipment. All technical rooms are equipped with smoke detectors, generators rooms are equipped also with flames detector and battery rooms are equipped with gas detectors.

The utilize a highly sensitive smoke detector (HSSD) fire detection system along with heat detectors and uses an N2 gas fire suppression system.

#### **Redundant Power**

The Cornaredo's datacenters have a minimum of 72 hours fuel autonomy with their diesel generators. The datacenters are equipped with dual power feeds, dual UPS system with 2N redundant configurations and diesel generators with N+1 redundancy.

#### Physical Alarm

Fire and intrusion alarm systems are monitored 24/7. External doors to the datacenters area are alarmed in accordance with local health and safety guidelines; these alarms are controlled and recorded at either the central control facility or the local facility.

#### Climate Control

Climate control equipment is installed at the Data4 Services's datacenters to protect against environmental factors, such as heat and humidity. These systems are maintained on a regular basis.

#### **Emergency Procedures and Routes**

Emergency procedures have been developed that encompass the various types of emergencies that could occur. Evacuation routes and exits are identified and posted in various locations in the facilities.

Emergency lighting is installed at data center facilities in the event of power failure or emergency. In addition, building management periodically conducts fire drills.

#### Preventive maintenance

Third-party maintenance contracts exist for environmental systems, including the UPS, heating, ventilation and air conditioning (HVAC), and diesel generator. Operational procedures for power and environmental systems are provided and maintained by power and infrastructure.

Any intervention must be the subject of a validated application in the software (JIRA) with the formalization of an intervention report. Third party maintenance reports are archived on specific servers.

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### IV. Auditor's description of system and controls

On the 15/02/2024, we visited the Cornaredo site (in Italy), and more specifically the following datacenters :

- DC06 of generation Y';
- DC07 of generation L'.

Concerning the datacenters DC07, we were unable to review the 2023's maintenance reports due to the fact it went into production in November 2023.

All tests were conducted on site.

A description of the type of tests, performed for the operational effectiveness are detailed in the following matrices :

TYPE	DESCRIPTION
Inquiry	Inquire of appropriate personnel seeking relevant information or representation including among other things:
	<ul> <li>Knowledge and additional information regarding the policy or procedure;</li> </ul>
	<ul> <li>Corroborating evidence of the policy or procedure.</li> </ul>
	As inquiries were performed for substantially all controls, the test was not listed individually for every control shown in the accompanying matrices.
Observation	Observe the application or existence of specific controls as represented.
Inspection	Inspect documents and records indicating performance of the controls. This testing includes among other things:
	<ul> <li>Inspection of reconciliations and management reports that age or quantify reconciling items to assess whether balances and reconciling items are properly monitored, controlled, and resolved on a timely basis.</li> </ul>
	<ul> <li>Examinations of source documentation and authorizations to verify propriety of transactions processed.</li> </ul>
	<ul> <li>Examination of documents or records for evidence of performance, such as existence of initials or signatures.</li> </ul>
	<ul> <li>Inspection of systems documentation, such as operations manuals, flow charts and job descriptions.</li> </ul>
Re-performance	Re-perform the control, or processing of the application controls, to help ensure the accuracy of its operation. This testing includes, among other things:
	<ul> <li>Obtaining evidence of the arithmetical accuracy and correct processing of transactions by performing independent calculations.</li> </ul>
	<ul> <li>Re-performing the matching of various system records by independently matching the same records and comparing reconciling items to the Company's prepared reconciliations if applicable.</li> </ul>

### Type of Test Procedures Performed

This report is intended solely for the information and use of Data4, customers of Data4 Hosting services, and the independent auditors of such customers.

Control N°	Control Description	Testing Performed by Grant Thornton	Test results
		Physical Security	
Cont	rol objectives: Controls provid	e reasonable assurance that physical access to datacenters is a	opropriately
		secured	
1.1	<i>Site access Buildings</i> Access to the site and to other covered by a daylight reception personnel and is there a team s assuring 24/24 7/7 guarding.	<ul> <li>buildings are h/security</li> <li>Constrained and the contract of the</li></ul>	Effective
1.2	Server/computer room acce There are 3 access control zon Zone", "DC Zone" and "DC T Zone") before accessing to cor rooms: - Security check: Limited access access (permanent or temporar - Safety grid around the zone's - CCTV controls. - Access by unipersonal airlock vehicle).	Observation         1. Observed during the Cornaredo site visit that security facilities exist at each level of "access" zone. The data center facilities are secured using a computerized proximity card-access system.         ss         es ("Campus Interior         Interior         mputer         2. Selected two datacenters of different generations, verified the existence of security facilities (CCTV, access control system, card-access), and ensured that they are supervised from the control center.         x (human or         3. Access controls are installed for exterior and interior doors, where needed. The access system controls electronic locks on both interior and exterior doors. The system also provides a history trail of access by card number and access point.	Effective
1.3	<i>Technical local access</i> The technical rooms in the dat accessible with keys managed a controlled by a secure electron password login).	acenters are and ic safe (with a ic safe (with a	Effective

Control N°	Control Description	Testing Performed by Grant Thornton	Test results
	Enviror	nmental controls	
Contro	ol objectives: Controls provide reasonable ass	surance that data center facilities are properly pr	rotected against
	enviroi	nmental factors.	
2.1	An environmental risks An environmental risk analysis is done on the external and internal risks (pollution, flood, earthquake, social movement, forest fire, physical safety problem, monitoring unavailability, weather unavailability, network failure etc.). This process is part of the ISO 14001 certification.	<i>Observation</i> 1. Observed the Environmental Risk Matrix formalizes the risk assessment and coverage measures, that are regularly reviewed for their suitability.	Effective
2.2	<ul> <li>Prevention/detection facilities</li> <li>Existence of : <ul> <li>Fire detection + HSSD (Vesda) High ;</li> <li>Sensitivity Smoke Detection facilities ;</li> <li>Humidity sensors - ambiance (atmospheric) ;</li> <li>Temperature sensors atmospheric and returned air.</li> </ul> </li> <li>Public areas are covered by video surveillance, private (customers) spaces on demand.</li> </ul>	<ul> <li>Observation</li> <li>1. Visited two datacenters selected and verified the existence of fire prevention / detection facilities are installed on the entire building with a system of locating possible disaster areas.</li> <li>Inspection</li> <li>2. For one Datacenters selected (DC06), consulted the 2023 maintenance reports, verified that the detection systems can detect moisture and high temperature anomalies. For one of the datacenters audited (DC07), we were unable to review the maintenance reports due to the fact that this datacenters went into production in November 2023.</li> </ul>	Effective
2.3	<i>Air conditioning/cooling systems</i> Air conditioning facilities have N+1 or N+2 level of redundancy. The air conditioning facilities and infrastructure are located outside the servers/customers' rooms - but inside the building, in the technical corridors.	<ul> <li>Observation</li> <li>1. Visited two datacenters selected and verified the existence of the cooling facilities in rooms with redundancy.</li> <li>Inspection</li> <li>2. For each of the air conditioning system units of one Datacenters selected (DC06), reviewed maintenance reports for 2023 prevent water leakage. For one of the datacenters audited (DC07), we were unable to review the maintenance reports due to the fact that this datacenters went into production in November 2023.</li> </ul>	Effective

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	Fire protection	Observation	
2.4	Fire detection installed in all different rooms. Extinguishing system deployed following "FM Global" recommendation. (Genset room, IT space, Some of the technical room) Smoke exhaust system installed for all different spaces, with capacity calculation online with the volume of the space. Characteristics of the wall, depending on the space, have an appropriate fire resistance. Genset and batteries rooms are 2 hours fire resistant. IT rooms are 1 hour fire resistant.	<ol> <li>Visited two datacenters selected and verified that the buildings and rooms meet the fire resistance and reaction to fire characteristics (double fire doors).</li> <li><i>Inspection</i></li> <li>For each unit of the fire detection facilities for one of the datacenters selected (DC06), reviewed that the maintenance reports of 2023 ensure their performance. For one of the datacenters audited (DC07), we were unable to review the maintenance reports due to the fact that this datacenters went into production in November 2023.</li> </ol>	Effective
2.5	<i>Flood</i> For buildings equipped with chilled water system, there is no piping into technical rooms. All water loops located into the corridors, where are installed the CraC units. Roof and floors are all watertight. Technical corridors are equipped with a trap to collect water and evacuate directly to used water network ("sewage").	<b>Observation</b> 1. Visited two datacenters selected and verified the existence of the facilities of recovery and evacuation of water in case of flood, ensuring the absence of failure of pipe and drains.	Effective
2.6	<ul> <li>Fire extinguishing system</li> <li>Fire extinguishing system are installed depending on the type of room. IT rooms are effectively equipped.</li> <li>Extinguishing system are fully programmed and automated following "FM Global" recommendation.</li> <li>All datacenters's generations are equipped with Water mist.</li> <li>Battery rooms are equipped with Hydrogen detection system.</li> </ul>	<ul> <li>Inspection</li> <li>1. Visited two selected datacenters and verified the existence of the automatic fire extinguishing system in several places in the corridors (Water mist).</li> <li>2. For one of the one selected datacenters (DC06), reviewed the maintenance reports of 2023 and verified that fire extinguishers are regularly tested and changed. For one of the audited datacenters (DC07), we were unable to review the maintenance reports due to the fact that this datacenters went into production in November 2023.</li> </ul>	Effective
2.7	<i>Monitoring</i> Two different teams are dedicated for alarm and supervision: - Security control center is managing and supervising the campus 24/7 in term of security and fire man brigade on site; - Technical team supervises facilities 24/7. On call services for both activity: Security and Facility.	<b>Observation</b> 1. Observed the datacenters's supervision center and verified that all protection and power supply systems are covered by the monitoring board, permanently 24/7. Security and technical alerts are logged in live, as well as the management of their treatments.	Effective

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Control Nº	Control Description	Testing Performed	Test results
1	Por	wer supply	
Contro	l objectives: controls provide reasonable assu	irance that the supply power of datacenters are	e backed up and
	distributed via au	itomatic transfer switches	_
3.1	<i>Electrical power</i> Campus is powered via 2 dedicated cables from substation directly to the campus (132 kV)	<ul> <li>Observation</li> <li>1. Observed technical architecture records of the one Datacenters, ensuring the existence of at least two main power sources.</li> <li>Inspection</li> <li>2. We consult the original contract and the 2023 amendment which clearly indicates that the campus is supplied via 2 dedicated 132 kV cables.</li> </ul>	Effective
3.2	<b>Redundancy and UPS</b> Double feed at transformer level. Switchboard are doubled and paired with each other. For all IT space, UPS is installed with batteries. Capacity of the UPS determines the acceptable load for each space. Batteries's autonomy is calculated to provide 10 Minutes full load. Each chain of UPS is located in separated rooms. The same for battery.	<ul> <li>Observation</li> <li>1. Visited two datacenters selected and verified the existence of UPS, distant from each other.</li> <li>Inspection</li> <li>2. For one of the Datacenters selected (DC06), reviewed the maintenance report of 2023, ensured that the UPS system is redundant with a sufficient autonomy capacity to cover all the infrastructures. For one of the datacenters audited (DC07), we were unable to review the maintenance reportsdue to the fact that this datacenters went into production in November 2023.</li> </ul>	Effective
3.3	<i>Power generator</i> All buildings are equipped with generators. Diesel engine for boat. - <i>First Generation is N+2 (2500 kVA X 4);</i> - <i>Second Generation is N+1 (2500 kVA X 3).</i> Theoretical autonomy for both DC is 94 hours (100 000 liters in 2 tanks).	<ul> <li>Observation <ol> <li>Visited two datacenters selected and verified the existence of the generators with the diesel engine of boat.</li> </ol> </li> <li>Inspection <ol> <li>For one of the Datacenters selected (DC06), reviewed the maintenance report of 2023, ensured that the generators have sufficient power rating to meet the datacenters requirements.</li> <li>For one of the datacenters audited (DC07), we were unable to review the maintenance reports. This is due to the fact that this datacenters went into production in November 2023.</li> </ol> </li> </ul>	Effective

Control N°	Control Description	Testing Performed by Grant Thornton	Test results
	User acc	ess management	
Contro	ol objectives: controls provide reasonable assu	arance that access management to datacenters	is appropriately
		secured.	
	Client Web Portal (CWP) – Identification and authentication	Inspection	
4.1	Access to the CWP Portal is managed through an individual user account and authentication mechanisms in accordance with best practices (using password).	1. Ensured that access to the CWP portal respected good practices in terms of setting passwords (length, attempts, expiration time,).	Effective
	Customer Web Portal (CWP) – user	<b>T</b> .	
	recertification	Inspection	ive
4.2	A review of CWP user accounts associated with DATA4 agents is carried out annually. This review is documented and archived.	1. Verified the existence of the latest user access recertifications on CWP in 2023.	Effect
	Access management (Amadeus		
4.4	<ul> <li>software) – Identification and authentication</li> <li>Access to Amadeus software is managed by generic user accounts accessible from a computer located in the SOC.</li> <li>Access to the SOC is restricted and tracked.</li> </ul>	<ol> <li>Inspection</li> <li>Verified that people with access to the SOC have justified and limited rights access.</li> <li>Verified that SOC accesses are tracked.</li> </ol>	Effective
	datacenters - Access management		
	(Amadeus)	Observation	
4.5	Access requests are made on CWP and result in an automatic email generation. Access configuration is done directly in Amadeus software based on this email.	<ol> <li>Observed an access creation request formulation in the software.</li> <li><i>Inspection</i></li> </ol>	ective
	The access cards (permanent and temporary) are set manually according to the environments defined by the customer.	2. Verified that the access control system configured rights of the card-access according to the CWP request.	Eff
	When requests are made by mail, the access configuration is directly done in Amadeus software.	occurrences. No exceptions noted.	

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Control N°	Control Description	Testing Performed by Grant Thornton	Test results
	Preventive	maintenance	
Control ob	ojectives: Controls provide reasonable assur system is properly configured to track v	ance that the management of the operationa alidation and archive maintenance reports.	l maintenance
5.1	<ul> <li>Proof of maintenance or tests</li> <li>All facilities (environmental protection and food) of buildings are covered by a multi-year maintenance schedule.</li> <li>Any intervention must be the subject of a validated application in the software (CMMS) with the formalisation of an intervention report.</li> <li>Any subject must be tracked by a ticket in JIRA software.</li> <li>Third-party maintenance reports are archived on specific servers.</li> </ul>	<ul> <li>Observation</li> <li>1. Observed on the Cornaredo site that the GMAO maintenance management software allowed interventions to be managed on-site.</li> <li>2. Observed on the Cornaredo site that the JIRA software is used.</li> <li><i>Inspection</i></li> <li>3. Verified that all maintenance reports are scheduled in GMAO software.</li> <li>4. Verified that all operations identified in maintenance reports have been traced in the JIRA tool.</li> </ul>	Effective

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### V. Other information provided by Data4 Services

### **ISO** certifications

The following certificates illustrate current ongoing Data4 Services ISO certifications.

• ISO/IEC 27001: 2013



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• ISO 9001 : 2015

AUVEN
BUREAU VERITAS Certification
DATA 4 SERVICES
Il s'agit d'un certificat multi-site, le détail des sites est énuméré dans l'annexe de ce certificat
6 RUE DE LA TREMOILLE 75008 - PARIS 8, FRANCE
Bureau Veritas Certification France certifie que le système de management de l'organisme susmentionné a été audité et jugé conforme aux exigences de la norme :
Standard
ISO 9001:2015
Domaine d'activité
DEVELOPPEMENT ET COMMERCIALISATION DE SOLUTIONS D'HEBERGEMENT INFORMATIQUE SECURISE ET MAINTIEN EN CONDITION OPERATIONNELLE DES INFRASTRUCTURES DATA CENTER.
DEVELOPMENT AND COMMERCIALIZATION OF SECURED IT HOSTING OF IT INFRASTRUCTURE AND MAINTENANCE IN OPERATIONAL CONDITIONS OF DATA CENTER INFRASTRUCTURES.
Date d'entrée en vigueur : <b>02 mars 2022</b> Sous réserve du fonctionnement continu et satisfaisant du système de management de
l'organisme, ce certificat est valable jusqu'au : 17 février 2025
Certificat n° : FR072759-1 Date: 03 mars 2022 Cofrac
Affaire n° : 12418855
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	DATA 4 SERVICES CORNAREDO	VIA MONZORO 103 20010 – CORNAREDO, ITALY	
	Certificat n° : Affaire n° :	FR072759-1 12418855	Date: 03 mars 2022
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**DATA 4 SERVICES** 

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6 RUE DE LA TREMOILLE 75008 PARIS 8 FRANCE

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### ISO 9001:2015

Domaine d'activité

DEVELOPPEMENT ET COMMERCIALISATION DE SOLUTIONS D'HEBERGEMENT INFORMATIQUE SECURISE ET MAINTIEN EN CONDITION OPERATIONNELLE DES INFRASTRUCTURES DATA CENTER

DEVELOPMENT AND COMMERCIALIZATION OF SECURED IT HOSTING OF IT INFRASTRUCTURE AND MAINTENANCE IN OPERATIONAL CONDITIONS OF DATA CENTER INFRASTRUCTURES

Date de début du cycle de certification : **02 mars 2022** Sous réserve du respect des dispositions contractuelles et des résultats positifs des surveillances réalisées, ce certificat est valable jusqu'au : **17 février 2025** 

Date d'expiration du cycle précédent : 17 février 2022 Date d'audit de certification/recertification : 12 janvier 2022 Date de certification originale : 18 février 2016

Certificat n° : FR072759-2 Affaire n° : 12418855

Date de révision : 20 février 2024

Samuel DUPRIEU - Président

Adresse de l'organisme certificateur : Bureau Veritas Certification France 1 Place Zaha Hadid - 92400 Courbevoie



Des informations supplémentaires concernant le périmètre de ce certificat ainsi que l'applicabilité des exigences du référentiel peuvent être obtenues en consultant l'organisme. Pour vérifier la validité de ce certificat, veuillez utiliser le QR Code.

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CCREDITATION N°4-0002 ste des sites et rtées disponibles





• ISO 14001 : 2015





• ISO 50001 : 2018

BUREAU VERITAS Certification
DATA 4 SERVICES
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Le domaine certifié couvre l'ensemble des activités des sites en annexe hors site centralisateur.
Date d'entrée en vigueur :         10 mars 2022           Sous réserve du fonctionnement continu et satisfaisant du système de management de
l'organisme, ce certificat est valable jusqu'au : 09 mars 2025
Cartificat p° : EP073365-1 Date: 11 mars 2022
Affaire n° : 12419345
Laurent CROGUENNEC - Président
Adresse de l'organisme certificateur : Bureau Veritas Certification France De STSTEMES Le Triangle de l'Arche - 9 Cours du Triangle - 92937 Paris La Défense De MANAGEMENT Accreteritation
BUREAU       Des informations supplémentaires concernant le périmètre de ce certificat ainsi que l'applicabilité des exigences du système de management peuvent être obtenues en consultant l'organisme. Pour vérifier la validité de ce certificat, vous pouvez téléphoner au : + 33 (0)1 41 97 00 60.       N*4-602 automations supplémentaires concernant le périmètre de ce certificat ainsi que l'applicabilité ainsi automations supplémentaires concernant le périmètre de ce certificat ainsi que l'applicabilité ainsi automations supplémentaires concernant le périmètre de ce certificat ainsi que l'applicabilité ainsi que l'



### **DATA 4 SERVICES**

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6 RUE DE LA TREMOILLE 75008 PARIS 8 FRANCE

Bureau Veritas Certification France certifie que le système de management de l'organisme susmentionné a été audité et jugé conforme aux exigences de la norme :

### ISO 50001:2018

Domaine d'activité

DÉVELOPPEMENT ET COMMERCIALISATION DE SOLUTIONS D'HÉBERGEMENT INFORMATIQUE SÉCURISÉ ET MAINTIEN EN CONDITION OPÉRATIONNELLE DES INFRASTRUCTURES DATA CENTER

DEVELOPMENT AND COMMERCIALIZATION OF SECURED IT HOSTING OF IT INFRASTRUCTURE AND MAINTENANCE IN OPERATIONAL CONDITIONS OF DATA CENTER INFRASTRUCTURES

Le domaine certifié couvre l'ensemble des activité des sites en annexe hors site centralisateur

Date de début du cycle de certification : 10 mars 2022 Sous réserve du respect des dispositions contractuelles et des résultats positifs des surveillances réalisées, ce certificat est valable jusqu'au : 09 mars 2025 Date d'expiration du cycle précédent : 09 mars 2022 Date d'audit de certification/recertification : 13 janvier 2022 Date de certification originale : 09 mars 2016

Certificat n°: FR073365-2 Affaire nº: 12419345

Date de révision : 28 février 2024

Samuel DUPRIEU - Président



Adresse de l'organisme certificateur : Bureau Veritas Certification France 1 Place Zaha Hadid - 92400 Courbevoie

Des informations supplémentaires concernant le périmètre de ce certificat ainsi que l'applicabilité des exigences du référentiel peuvent être obtenues en consultant l'organisme. Pour vérifier la validité de ce certificat, veuillez utiliser le QR Code.

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• ISO 45001 : 2018



