

# INFORMATION ON THE DATA ACT

## Implementation of Article 28 of the Data Act

*The following statement applies to the Creatio customers located in the European Union:*

On 12 September 2025, the provisions of Regulation (EU) 2023/2854 of the European Parliament and of the Council of 13 December 2023 on harmonized rules on fair access to and use of data and amending Regulation (EU) 2017/2394 and Directive (EU) 2020/1828 (Data Act) hereinafter referred to as the "Data Act", came into force in the European Union/EEA.

In order to properly fulfil its obligations under the Data Act, CREATIO EMEA LTD (Kinyra, 1 KINYRAS TOWER, 3rd floor 'Agios Andreas, 1102, Nicosia, Cyprus) and its affiliates (hereinafter "the Company"), having regard to Article 28 of the Data Act, provides this information on its ICT infrastructure (as defined in the Data Act) and the measures it takes to protect data processed as part of its SaaS solution. This document is applicable to the extent legally required by the Data Act, as described in Article 1(3) of the Data Act, and to the extent it is related to the Company's SaaS offerings.

**CONTACT FOR MEMBER STATE AUTHORITIES, THE EUROPEAN COMMISSION, AND THE EUROPEAN BOARD FOR DIGITAL SERVICES:** [dpo@creatio.com](mailto:dpo@creatio.com)

In order to ensure compliance with the Data Act and the laws of the European Union and Member States, the Company applies the following measures:

- technical measures, as described in Creatio GDPR;
- organizational – including incident response procedures and regular, cyclical security audits,
- contractual – including contractual obligations of ICT providers and subcontractors that do not allow the transfer or disclosure of data to third country authorities in a manner that is inconsistent with EU or national law.

Taking into account the above-mentioned methods and the Company's introduced and implemented standard of operation, the Company confirms that requests from government authorities of third countries that comply with EU or national law will not result in the disclosure of Customer Data in a manner contrary to applicable laws.

### MEASURES TO PROTECT AGAINST UNAUTHORISED INTERNATIONAL ACCESS TO NON-PERSONAL DATA

The ICT infrastructure used to process Customer Data as part of the Company's SaaS solution is located in the EEA and uses top-tier hosting providers. The specific location may be specified from time to time in the Customer's agreement with the Company. Consequently, the above-mentioned infrastructure is subject to the jurisdiction of the laws applicable in the territory where the data in question is stored and/or processed.

### RULES FOR CHANGING THE DATA PROCESSING SERVICE PROVIDER

Customers of the Company's SaaS solution have the right to change their data processing service provider in accordance with the rules set out in the Data Act and in the respective annex to the relevant Master Subscription Agreement. A description of the rules for changing the data processing service provider can be found in the EU Data Act Annex to the Master Subscription Agreement available at [www.creatio.com/legal](http://www.creatio.com/legal).