

## Letter of HITRUST Risk-based, 2-year (r2) Certification

July 18, 2025

International Business Machines Corporation IBM Cloud Infrastructure as a Service (IaaS) IBM Cloud IaaS  
14001 Dallas Pkwy  
Dallas, TX USA 75240-4346

HITRUST has developed the HITRUST CSF, a certifiable security and privacy framework which incorporates information protection requirements based on input from leading organizations. HITRUST identified a subset of the HITRUST CSF requirements that an organization must meet to be HITRUST Risk-based, 2-year (r2) Certified for a defined assessment scope. International Business Machines Corporation IBM Cloud Infrastructure as a Service (IaaS) IBM Cloud IaaS ("the Organization") has chosen to perform a HITRUST CSF v11.3.2 r2 validated assessment utilizing a HITRUST Authorized External Assessor Organization ("External Assessor").

### Scope

The following platforms of the Organization were included within the scope of this assessment ("Scope") which included a review of the referenced facilities and supporting infrastructure for the applicable information protection requirements:

#### Platforms:

- FortiGate Security Appliance residing at AMS03, CHE01, DAL08, DAL09, DAL10, DAL12, DAL13, DAL14, FRA02, FRA04, FRA05, LON02, LON04, LON05, LON06, MAD02, MAD04, MAD05, MIL01, MON01, OSA2X, PAR01, PAR04, PAR05, PAR06, SAO01, SAO04, SAO05, SJC03, SJC04, SNG01, SYD01, SYD04, SYD05, TOK02, TOK04, TOK05, TOR01, TOR04, TOR05, WDC03, WDC04, WDC06, and WDC07
- Gateway Appliance residing at AMS03, CHE01, DAL08, DAL09, DAL10, DAL12, DAL13, DAL14, FRA02, FRA04, FRA05, LON02, LON04, LON05, LON06, MAD02, MAD04, MAD05, MIL01, MON01, OSA2X, PAR01, PAR04, PAR05, PAR06, SAO01, SAO04, SAO05, SJC03, SJC04, SNG01, SYD01, SYD04, SYD05, TOK02, TOK04, TOK05, TOR01, TOR04, TOR05, WDC03, WDC04, WDC06, and WDC07
- Hardware Firewall residing at AMS03, CHE01, DAL08, DAL09, DAL10, DAL12, DAL13, DAL14, FRA02, FRA04, FRA05, LON02, LON04, LON05, LON06, MAD02, MAD04, MAD05, MIL01, MON01, OSA2X, PAR01, PAR04, PAR05,

- PAR06, SAO01, SAO04, SAO05, SJC03, SJC04, SNG01, SYD01, SYD04, SYD05, TOK02, TOK04, TOK05, TOR01, TOR04, TOR05, WDC03, WDC04, WDC06, and WDC07
- IBM Cloud Backup residing at AMS03, CHE01, DAL08, DAL09, DAL10, DAL12, DAL13, DAL14, FRA02, FRA04, FRA05, LON02, LON04, LON05, LON06, MAD02, MAD04, MAD05, MIL01, MON01, OSA2X, PAR01, PAR04, PAR05, PAR06, SAO01, SAO04, SAO05, SJC03, SJC04, SNG01, SYD01, SYD04, SYD05, TOK02, TOK04, TOK05, TOR01, TOR04, TOR05, WDC03, WDC04, WDC06, and WDC07
  - IBM Cloud Bare Metal residing at AMS03, CHE01, DAL08, DAL09, DAL10, DAL12, DAL13, DAL14, FRA02, FRA04, FRA05, LON02, LON04, LON05, LON06, MAD02, MAD04, MAD05, MIL01, MON01, OSA2X, PAR01, PAR04, PAR05, PAR06, SAO01, SAO04, SAO05, SJC03, SJC04, SNG01, SYD01, SYD04, SYD05, TOK02, TOK04, TOK05, TOR01, TOR04, TOR05, WDC03, WDC04, WDC06, and WDC07
  - IBM Cloud Block Storage residing at AMS03, CHE01, DAL08, DAL09, DAL10, DAL12, DAL13, DAL14, FRA02, FRA04, FRA05, LON02, LON04, LON05, LON06, MAD02, MAD04, MAD05, MIL01, MON01, OSA2X, PAR01, PAR04, PAR05, PAR06, SAO01, SAO04, SAO05, SJC03, SJC04, SNG01, SYD01, SYD04, SYD05, TOK02, TOK04, TOK05, TOR01, TOR04, TOR05, WDC03, WDC04, WDC06, and WDC07
  - IBM Cloud Direct Link "1.0" residing at AMS03, CHE01, DAL08, DAL09, DAL10, DAL12, DAL13, DAL14, FRA02, FRA04, FRA05, LON02, LON04, LON05, LON06, MAD02, MAD04, MAD05, MIL01, MON01, OSA2X, PAR01, PAR04, PAR05, PAR06, SAO01, SAO04, SAO05, SJC03, SJC04, SNG01, SYD01, SYD04, SYD05, TOK02, TOK04, TOK05, TOR01, TOR04, TOR05, WDC03, WDC04, WDC06, and WDC07
  - IBM Cloud File Storage residing at AMS03, CHE01, DAL08, DAL09, DAL10, DAL12, DAL13, DAL14, FRA02, FRA04, FRA05, LON02, LON04, LON05, LON06, MAD02, MAD04, MAD05, MIL01, MON01, OSA2X, PAR01, PAR04, PAR05, PAR06, SAO01, SAO04, SAO05, SJC03, SJC04, SNG01, SYD01, SYD04, SYD05, TOK02, TOK04, TOK05, TOR01, TOR04, TOR05, WDC03, WDC04, WDC06, and WDC07
  - IBM Cloud Load Balancer residing at AMS03, CHE01, DAL08, DAL09, DAL10, DAL12, DAL13, DAL14, FRA02, FRA04, FRA05, LON02, LON04, LON05, LON06, MAD02, MAD04, MAD05, MIL01, MON01, OSA2X, PAR01, PAR04, PAR05, PAR06, SAO01, SAO04, SAO05, SJC03, SJC04, SNG01, SYD01, SYD04, SYD05, TOK02, TOK04, TOK05, TOR01, TOR04, TOR05, WDC03, WDC04, WDC06, and WDC07
  - IBM Cloud Object Storage (IaaS) residing at AMS03, CHE01, DAL08, DAL09, DAL10, DAL12, DAL13, DAL14, FRA02, FRA04, FRA05, LON02, LON04, LON05, LON06, MAD02, MAD04, MAD05, MIL01, MON01, OSA2X, PAR01, PAR04, PAR05, PAR06, SAO01, SAO04, SAO05, SJC03, SJC04, SNG01,

- SYD01, SYD04, SYD05, TOK02, TOK04, TOK05, TOR01, TOR04, TOR05, WDC03, WDC04, WDC06, and WDC07
- IBM Cloud Virtual Servers residing at AMS03, CHE01, DAL08, DAL09, DAL10, DAL12, DAL13, DAL14, FRA02, FRA04, FRA05, LON02, LON04, LON05, LON06, MAD02, MAD04, MAD05, MIL01, MON01, OSA2X, PAR01, PAR04, PAR05, PAR06, SAO01, SAO04, SAO05, SJC03, SJC04, SNG01, SYD01, SYD04, SYD05, TOK02, TOK04, TOK05, TOR01, TOR04, TOR05, WDC03, WDC04, WDC06, and WDC07
  - Internal Management System (IMS) residing at AMS03, CHE01, DAL08, DAL09, DAL10, DAL12, DAL13, DAL14, FRA02, FRA04, FRA05, LON02, LON04, LON05, LON06, MAD02, MAD04, MAD05, MIL01, MON01, OSA2X, PAR01, PAR04, PAR05, PAR06, SAO01, SAO04, SAO05, SJC03, SJC04, SNG01, SYD01, SYD04, SYD05, TOK02, TOK04, TOK05, TOR01, TOR04, TOR05, WDC03, WDC04, WDC06, and WDC07
  - SAP-Certified Cloud Infrastructure residing at AMS03, CHE01, DAL08, DAL09, DAL10, DAL12, DAL13, DAL14, FRA02, FRA04, FRA05, LON02, LON04, LON05, LON06, MAD02, MAD04, MAD05, MIL01, MON01, OSA2X, PAR01, PAR04, PAR05, PAR06, SAO01, SAO04, SAO05, SJC03, SJC04, SNG01, SYD01, SYD04, SYD05, TOK02, TOK04, TOK05, TOR01, TOR04, TOR05, WDC03, WDC04, WDC06, and WDC07
  - Security: IBM Cloud Hardware Security Module residing at AMS03, CHE01, DAL08, DAL09, DAL10, DAL12, DAL13, DAL14, FRA02, FRA04, FRA05, LON02, LON04, LON05, LON06, MAD02, MAD04, MAD05, MIL01, MON01, OSA2X, PAR01, PAR04, PAR05, PAR06, SAO01, SAO04, SAO05, SJC03, SJC04, SNG01, SYD01, SYD04, SYD05, TOK02, TOK04, TOK05, TOR01, TOR04, TOR05, WDC03, WDC04, WDC06, and WDC07
  - Storage Area Network (SAN) residing at AMS03, CHE01, DAL08, DAL09, DAL10, DAL12, DAL13, DAL14, FRA02, FRA04, FRA05, LON02, LON04, LON05, LON06, MAD02, MAD04, MAD05, MIL01, MON01, OSA2X, PAR01, PAR04, PAR05, PAR06, SAO01, SAO04, SAO05, SJC03, SJC04, SNG01, SYD01, SYD04, SYD05, TOK02, TOK04, TOK05, TOR01, TOR04, TOR05, WDC03, WDC04, WDC06, and WDC07

**Facilities:**

- AMS03 (Data Center) managed by NorthC located in Almere, Netherlands
- CHE01 (Data Center) managed by STT Global Data Centres located in Chennai, India
- DAL08 (Data Center) managed by Digital Realty located in Richardson, TX, United States of America
- DAL09 (Data Center) managed by Digital Realty located in Richardson, TX, United States of America
- DAL10 (Data Center) managed by QTS located in Irving, TX, United States of America

- DAL12 (Data Center) managed by Digital Realty located in Richardson, TX, United States of America
- DAL13 (Data Center) managed by CyrusOne located in Carrollton, TX, United States of America
- DAL14 (Data Center) managed by Stack Infrastructure located in Plano, TX, United States of America
- FRA02 (Data Center) managed by Cyrus One located in Frankfurt, Germany
- FRA04 (Data Center) managed by NTT Global Data Centers located in Frankfurt, Germany
- FRA05 (Data Center) managed by Interxion located in Frankfurt, Germany
- LON02 (Data Center) managed by Digital Realty located in Chessington, London, United Kingdom of Great Britain and Northern Ireland
- LON04 (Data Center) managed by Ark Data Centres located in Farnborough, United Kingdom of Great Britain and Northern Ireland
- LON05 (Data Center) managed by NTT Global Data Centers located in Hemel Hempstead, United Kingdom of Great Britain and Northern Ireland
- LON06 (Data Center) managed by Cyrus One located in Slough, United Kingdom of Great Britain and Northern Ireland
- MAD02 (Data Center) managed by Data4 Group located in Madrid, Spain
- MAD04 (Data Center) managed by NTT Global Data Centers located in Madrid, Spain
- MAD05 (Data Center) managed by Interxion, A Digital Realty Company located in Madrid, Spain
- MIL01 (Data Center) managed by Data4 Group located in Milan, Italy
- MON01 (Data Center) managed by Cologix located in Montreal, Canada
- OSA2X (Data Center) managed by IDC Frontier, Digital Infrastructure company of the SoftBank Group located in Osaka, Japan
- PAR01 (Data Center) managed by Global Switch located in Paris, France
- PAR04 (Data Center) managed by Global Switch located in Paris, France
- PAR05 (Data Center) managed by BNP PARIBAS located in Bailly-Romainvilliers, France
- PAR06 (Data Center) managed by BNP PARIBAS located in Bussy Saint Georges, France
- SAO01 (Data Center) managed by Ascenty, A Digital Realty and Brookfield Infrastructure JV located in Sao Paulo, Brazil
- SAO04 (Data Center) managed by ODATA located in Santana De Parnaíba, Brazil, Brazil
- SAO05 (Data Center) managed by Ascenty, A Digital Realty and Brookfield Infrastructure JV located in Sao Paulo, Brazil
- SJC03 (Data Center) managed by Digital Realty located in Santa Clara, CA, United States of America

- SJC04 (Data Center) managed by Stack Infrastructure located in San Jose, CA, United States of America
- SNG01 (Data Center) managed by Digital Realty located in Jurong East, Singapore
- SYD01 (Data Center) managed by Global Switch located in Sydney, Australia
- SYD04 (Data Center) managed by Digital Realty located in Erskine Park, Australia
- SYD05 (Data Center) managed by Equinix located in Sydney, Australia
- TOK02 (Data Center) managed by AT Tokyo located in Tokyo, Japan
- TOK04 (Data Center) managed by SoftBank located in Saitama, Japan
- TOK05 (Data Center) managed by NTT Global Data Centers located in Tokyo, Japan
- TOR01 (Data Center) managed by Digital Realty located in Markham, Ontario, Canada
- TOR04 (Data Center) managed by Serverfarm located in Ontario, Canada
- TOR05 (Data Center) managed by Digital Realty located in Vaughan, Canada
- WDC03 (Data Center) managed by Digital Realty located in Ashburn, VA, United States of America
- WDC04 (Data Center) managed by Digital Realty located in Ashburn, VA, United States of America
- WDC06 (Data Center) managed by RagingWire, NTT Global Data Centers located in Ashburn, VA, United States of America
- WDC07 (Data Center) managed by Sabey located in Ashburn, VA, United States of America

## Certification

The Organization has met the criteria specified as part of the HITRUST Assurance Program to obtain a HITRUST r2 validated assessment report with certification ("Certification") for the Scope. Certification is awarded based on each domain's average maturity score meeting a minimum score. Within each domain the maturity scores for each requirement statement were validated by an External Assessor and the assessment was subjected to quality assurance procedures performed by HITRUST.

The Certification for the Scope is valid for a period of two years from the date of this letter assuming the following occurs. If any of these criteria are not met, HITRUST will perform an investigation to determine ongoing validity of the certification and reserves the right to revoke the Organization's certification.

- No security events resulting in unauthorized access to the assessed environment or data housed therein, including any data security breaches occurring within or affecting the

assessed environment reportable to a federal or state agency by law or regulation

- No significant changes in the business or security policies, practices, controls, and processes have occurred that might impact its ability to meet the HITRUST r2 certification criteria specified as part of the HITRUST Assurance Program.

Users of this letter can contact HITRUST customer support ([support@hitrustalliance.net](mailto:support@hitrustalliance.net)) for questions on using this letter.

### **The Organization's Assertions**

Management of the Organization has provided the following assertions to HITRUST:

- The Organization has acknowledged that, as members of management, they are responsible for the information protection controls implemented as required by the HITRUST.
- The Organization has implemented the information protection controls as described within their assessment.
- The Organization maintains the information security management program via monitoring, review, and periodic re-assessments of the information protection controls.
- The Organization has responded honestly, accurately, and completely to inquiries made throughout the assessment process and certification lifecycle.
- The Organization has provided the External Assessor with accurate and complete records and necessary documentation related to the information protection controls included within the scope of its assessment.
- The Organization has disclosed all design and operating deficiencies in its information protection controls of which is it aware throughout the assessment process, including those where it believes the cost of corrective action may exceed the benefits.
- No events or transactions have occurred or are pending that would have an effect on the assessment that was performed and used as a basis by HITRUST for issuing the report.
- There have been no communications from regulatory agencies concerning noncompliance with or deficiencies regarding the information protection controls that are included within the Scope of this assessment.

### **External Assessor Responsibilities**

External Assessors are authorized by HITRUST based upon a thorough vetting process to demonstrate their ability to perform HITRUST CSF assessments, and individual practitioners are required to maintain appropriate credentials based upon their role on HITRUST assessments. In HITRUST r2 validated assessments the External Assessor is responsible for:

- Reviewing and gaining a detailed understanding of the information provided by the Organization.
- Performing sufficient procedures to validate the control maturity scores provided by the Organization.
- Meeting all HITRUST Assessment criteria described within the HITRUST Assessment Handbook.

### **HITRUST Responsibilities**

HITRUST is responsible for maintenance of the HITRUST CSF and HITRUST Assurance Program against which the Organization and an External Assessor completed this assessment.

HITRUST performed a quality assurance review of this assessment to support that the control maturity scores were consistent with the results of testing performed by the External Assessor. HITRUST's quality assurance review incorporated a risk-based approach to substantiate the External Assessor's procedures were performed in accordance with the requirements of the HITRUST Assurance Program.

A version of this letter with a more detailed scope description has also been issued by HITRUST. A full HITRUST Validated Assessment Report has also been issued by HITRUST. Additional information on the HITRUST Assurance Program can be found at the HITRUST website (<https://hitrustalliance.net>).

### **Limitations of Assurance**

The HITRUST Assurance Program is intended to gather and report information in an efficient and effective manner. The assessment is not a substitute for a comprehensive risk management program but is a critical data point in risk analysis. The assessment should also not be a substitute for management oversight and decision-making but, again, leveraged as a key input.



HITRUST