aginion

Digital Operational Resilience Act

Statement of Support and Readiness

Aginion Luxembourg

Date: 2025-02-18

Classification: Public

Purpose

This statement is for our financial-sector customers and prospective customers subject to the Digital Operational Resilience Act (Regulation (EU) 2022/2554, "DORA"). It explains our status under DORA, the contractual terms we are ready to enter into, and the operational capabilities that support your compliance. It is provided for information and is not a contractual warranty; binding terms are set out in the applicable service agreement and its DORA addendum.

Our status under DORA

We are an ICT third-party service provider. We are not a financial entity, and we are not a designated critical ICT third-party service provider (CTPP) under DORA. DORA therefore does not impose obligations on us directly; it reaches our services through the contractual requirements that you, as a financial entity, must place on your ICT providers under Article 30. We are set up to meet those requirements.

Contractual readiness

We enter into DORA-compliant contractual terms as part of onboarding. Our terms are structured in two tiers:

- Baseline terms covering the provisions required for all ICT service contracts — including clear service descriptions, processing and service locations, service levels, data availability and recovery, incident cooperation and assistance, notification of material developments, and termination rights.
- Enhanced terms covering the additional provisions required where a service supports a critical or important function — including detailed service-level targets, monitoring and audit rights, participation in resilience testing where relevant, contingency and security requirements, and exit and transition assistance.

Whether a service supports a critical or important function is a determination you make as the financial entity. We provide the enhanced terms wherever you classify the service accordingly. The full DORA addendum is provided during contracting, or on request.

Operational capabilities

Our services are backed by the following, which support the operational-resilience outcomes DORA expects of your ICT arrangements:

- ICT security management aligned with our ISO/IEC 27001 certification.
- Incident detection and management, including notification to and cooperation with you so that you can meet your own DORA incident-reporting obligations.
- Business continuity and disaster recovery, maintained and tested on a regular basis.
- Audit and access rights for you, your appointed representatives, and your competent authorities, as set out in the contractual terms.
- Exit and transition support, including assistance with an orderly transfer of services under planned or stressed conditions.
- Subcontracting transparency — we disclose the material subcontractors within our ICT supply chain relied upon to provide the service, and notify you of intended material changes, in line with the contractual terms.
- Data and service location within the EU / Luxembourg.

Supporting your DORA obligations

- Register of Information. We provide the information you need to record our arrangements in your Register of Information, in the format and detail required.
- Incident reporting. Our incident notifications are designed to give you the information and timing you need to assess and report ICT-related incidents to your competent authority.
- Oversight and testing. We cooperate with your monitoring, audits, and resilience testing as provided in the contractual terms.

Related documents

This statement should be read alongside our ISO/IEC 27001 certification, our business-continuity and disaster-recovery statement, our incident-response statement, and our subprocessor statement.

Governance and review

This statement is reviewed at least annually, and sooner if triggered by a material change in our services, our contractual terms, or the applicable law.

- End of Document -

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Aginion Group

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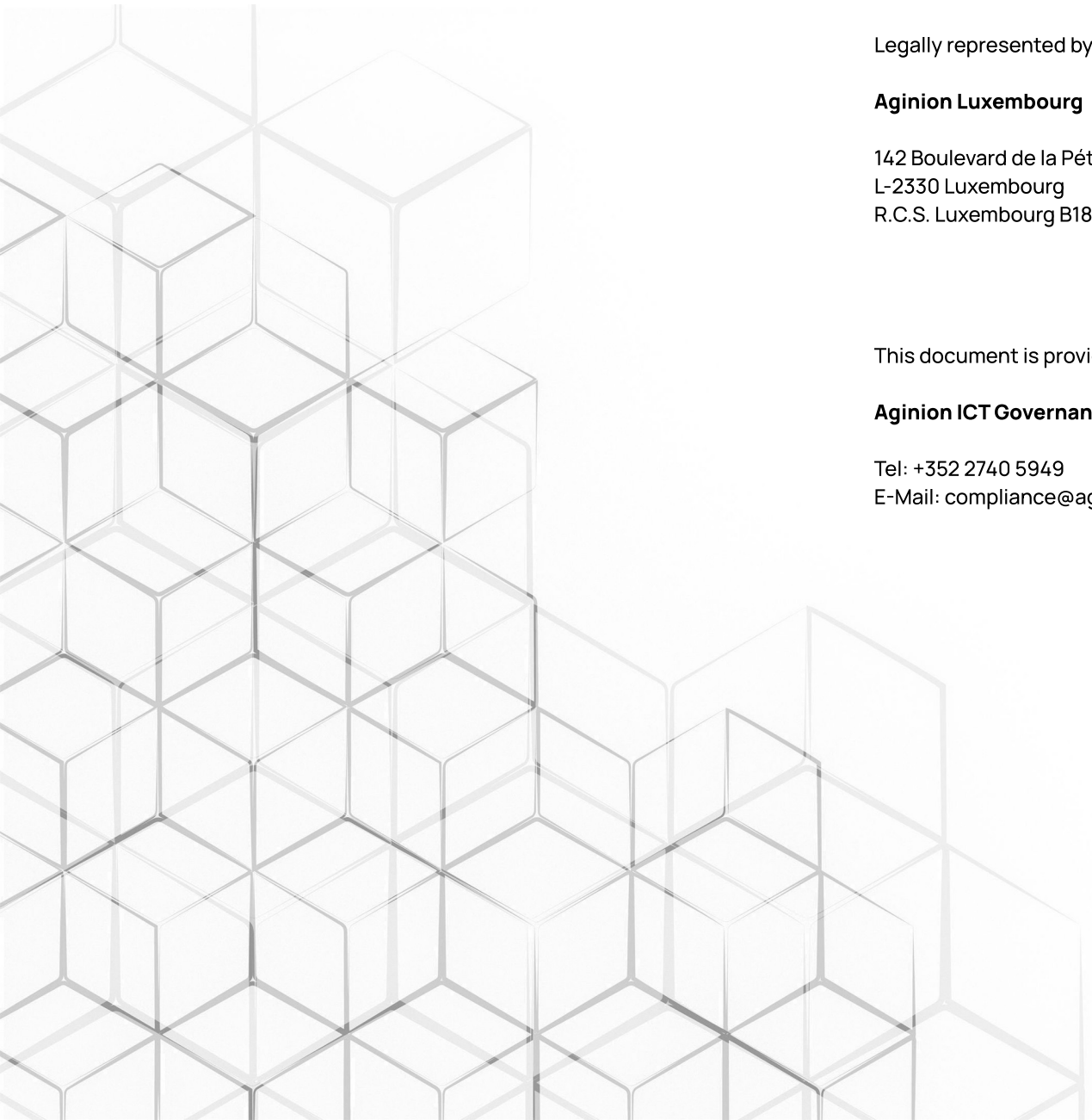
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