

## Appendix 2 of the Data Protection Agreement: Technical and Organizational Measures in accordance with Article 32 of the GDPR

The Technical and Organizational Measures (TOMs) are in place to make sure that there is an appropriate level of protection for personal data, and more specifically, to protect the rights and freedoms for data subjects. Below, you will find details information about Hetzner's TOMs.

You can also find more information at <https://docs.hetzner.com/general/others/technical-and-organizational-measures>.

### 1 Physical access control

Physical access control defines who has physical access to a site, building, or room.

Measure	Data centers	Admin buildings
Electronic physical entry control system with log	✓	✓
Documented distribution of access medium	✓	✓
Comprehensive video monitoring	✓	✓
Policy about how to handle visitors	✓	✓
High security perimeter fencing (with anti-climbing and anti-tunnelling protection) around the entire data center park	✓	NA
Separate colocation area with lock-able racks	✓	NA

**For the next few sections of this article, the following is true:**

**Dedicated servers/Cloud servers:** You/the Client are completely responsible for the management, maintenance and security of the server.

**Managed products:** For these products, we at Hetzner take responsibility for the maintenance, administration, and security of your systems.

## 2 Electronic access control

The electronic access control defines who is allowed to log on to a system so that only authorized people have access to it.

Measure	Colo- cation	Dedicated servers	Cloud servers	Managed servers	Web hosting	Storage Shares	Storage Boxes	Object Storage
Individual customer ac- counts with numerous management options and access to the administra- tion interface	✓	✓	✓	✓	✓	✓	✓	✓
Traceable access logs and change logs for cus- tomer accounts	✓	✓	✓	✓	✓	✓	✓	✓
Required passwords for customer accounts with defined minimum require- ments	✓	✓	✓	✓	✓	✓	✓	✓

Measure	Colo- cation	Dedicated servers	Cloud servers	Managed servers	Web hosting	Storage Shares	Storage Boxes	Object Storage
Option for two factor authentication (2FA) for customer account	✓	✓	✓	✓	✓	✓	✓	✓
Client has exclusive access to server	✓	✓	✓	NA	NA	NA	NA	NA
Only authorized Hetzner employees have access, within the scope of the agreed service; via multi-level authentication and cryptographic protection Access done for tasks ranging from infrastructure maintenance to complete server management depending on product	NA	NA	NA	✓	✓	✓	✓	NA
Individually configured firewall	NA	✓	✓	NA (see next line)	NA (see next line)	NA (see next line)	NA (see next line)	✓
Hetzner-managed firewall with 24/7 monitoring	NA	NA (see last line)	NA (see last line)	✓	✓	✓	✓	NA (see last line)
Virus scanner / Security tests	Client's responsibility	✓	✓	✓	✓	Rootkit tests	Rootkit tests	-

Measure	Colo- cation	Dedicated servers	Cloud servers	Managed servers	Web hosting	Storage Shares	Storage Boxes	Object Storage
(Additional) measures the responsibility of the Client	✓	✓	✓	NA	NA	NA	NA	✓

## 3 Internal access control

Internal access control defines which authorizations people have within a system. It defines what a user may see, change, or execute after accessing a system.

Measure	Colo- cation	Dedi- cated servers	Cloud servers	Managed servers	Web hosting	Storage Shares	Storage Boxes	Object Storage	Internal admin systems
<b>Regular updates</b>	Client's responsi- bility	Client's responsi- bility	✓ for the under- lying cloud infrastructure	✓	✓	✓	✓	✓	✓
<b>Audit-proof, binding authorization pro- cedure based on a roll and authoriza- tion policy</b>	Client's responsi- bility	Client's responsi- bility	✓ the cloud in- frastructure is accessed	✓	✓	✓	✓	✓	✓
<b>Maintaining, secur- ing, and updating transferred data/software</b>	Client's responsi- bility	Client's responsi- bility	Client's responsi- bility	Client's responsi- bility	Client's responsi- bility	Client's responsi- bility	Client's responsi- bility	Client's responsi- bility	NA
<b>(Additional) measures the re- sponsibility of the Client</b>	✓	✓	✓ regarding ac- cess to cloud servers	NA	NA	NA	NA	NA	NA

## 4 Transfer control

Transfer control includes measures and procedures that makes sure that the use, access, and transport of physical data storage media are monitored and protected against unauthorized access.

Measure	Colo- cation	Dedi- cated servers	Cloud servers	Managed servers	Web hosting	Storage Shares	Storage Boxes	Object Storage	Internal admin systems
<b>Defined process for deleting data from storage drives after contract is complete</b> Implemented differently depending on product type	Client's responsibility	✓	✓	✓	✓	✓	✓	✓	✓
<b>Storage drives are physically destroyed if data cannot be successfully erased</b>	Client's responsibility	✓	✓	✓	✓	✓	✓	✓	✓

## 5 Isolation control

Measures for isolation control make sure that data for each different customer or application within a system are separated from each other when they are processed and stored.

Measure	Colo- cation	Dedi- cated servers	Cloud servers	Managed servers	Web hosting	Storage Shares	Storage Boxes	Object Storage	Internal admin systems
<b>Physical or logical separation of data</b>	Client's responsi- bility	Client's responsi- bility	✓	✓	✓	✓	✓	✓	✓
<b>Physical and logical separation of back-up data</b>	Client's responsi- bility	Client's responsi- bility	✓	✓	✓	✓	✓	NA	✓
<b>(Additional) measures the re- sponsibility of the Client</b>	✓	✓	✓	NA	NA	NA	NA	NA	NA

## 6 Pseudonymization

Using pseudonymization methods, personal data is modified in such a way that it cannot be tied to specific people without additional information being provided.

Measure	Colo- cation	Dedicated servers	Cloud servers	Managed servers	Web hosting	Storage Shares	Storage Boxes	Object Storage
The Client is responsible for pseudonymization	✓	✓	✓	✓	✓	✓	✓	✓



## 7 Confidentiality

Confidentiality measures make sure that personal data is protected from unauthorized access or disclosure while it is being processed and stored.

Measure	General	Depends on product
Hetzner employees sign a confidentiality agreement before they begin doing any work with personal data in compliance with data protection regulations	✓	-
Hetzner employees regularly get training to raise awareness for and knowledge about data protection and information security	✓	-
Encryption options for data transfers	-	✓

## 8 Integrity

Data integrity measures make sure that data and systems remain complete, uncorrupted, and correct while they are being stored or transferred.

Measure	Colo- cation	Dedi- cated servers	Cloud servers	Managed servers	Web hosting	Storage Shares	Storage Boxes	Object Storage	Internal admin systems
Data changes are logged in an audit-proof manner	Client's responsibility	Client's responsibility	Client's responsibility	✓	✓	✓	✓	✓	✓
The Client is responsible for entering and processing data	✓	✓	✓	✓	✓	✓	✓	✓	✓ the Client can edit their data themselves using their customer account
(Additional) measures the responsibility of the Client	✓	✓	✓	✓	✓	✓	✓	✓	NA

## 9 Availability and resilience

Availability measures focus on keeping the systems in continued working order. Resilience measures make sure that the data remains available even under exceptional circumstances.

Measure	Colo- cation	Dedi- cated servers	Cloud servers	Managed servers	Web hosting	Storage Shares	Storage Boxes	Object Storage	Internal admin systems
<b>24/7 technical support directly in data center</b>	NA	✓	✓	✓	✓	✓	✓	✓	✓
<b>Uninterruptible power supply using redundant UPSs and emergency power supply system</b>	✓	✓	✓	✓	✓	✓	✓	✓	✓
<b>Redundant and highly available network infrastructure</b>	✓	✓	✓	✓	✓	✓	✓	✓	✓
<b>Site-wide early warning fire system; direct connection to the local fire and rescue coordination center</b>	✓	✓	✓	✓	✓	✓	✓	✓	✓

Measure	Colo- cation	Dedi- cated servers	Cloud servers	Managed servers	Web hosting	Storage Shares	Storage Boxes	Object Storage	Internal admin systems
Dynamic fire pro- tection measures	✓	✓	✓	✓	✓	✓	✓	✓	✓
Regular training for emergencies and fire protection	✓	✓	✓	✓	✓	✓	✓	✓	✓
Redundant and en- ergy-efficient cool- ing using direct free cooling and climate controls	✓	✓	✓	✓	✓	✓	✓	✓	✓
Cold-aisle contain- ment	✓	✓	✓	✓	✓	✓	✓	✓	✓
Continuous moni- toring of air temper- ature in server rooms and distribu- tion cabinets	✓	✓	✓	✓	✓	✓	✓	✓	✓
Continuous active DDoS recognition	✓	✓	✓	✓	✓	✓	✓	✓	✓

Measure	Colo- cation	Dedi- cated servers	Cloud servers	Managed servers	Web hosting	Storage Shares	Storage Boxes	Object Storage	Internal admin systems
<b>Backup and recovery plan</b>	Client's responsibility	Client's responsibility	✓ depends on purchased services	✓ partially depends on purchased services	Possible to restore specific files	RAID-based storage backend	Snapshots, depending on purchased services	Redundant storage within the cluster system	✓ daily back-ups of all relevant data
<b>Disk mirroring</b>	Client's responsibility	Client's responsibility	Client's responsibility	✓	✓	✓	✓	✓	✓ with all relevant servers
<b>Monitoring</b>	Client's responsibility	Client's responsibility	Client's responsibility	✓	✓	✓	✓	✓	✓ with all relevant servers
<b>Escalation chain for disruptions and emergencies</b>	See product description								✓
<b>Use of software firewall and port management</b>	Client's responsibility	Client's responsibility	Client's responsibility	✓	✓	✓	✓	✓	✓

## 10 Procedures for regular testing, assessment, and evaluation

Regularly testing, assessing, and evaluating the data protection and security standards ensures that the measures stay in compliance with regulations and improve over time.

Measure	General	Depends on product
Data protection information security management system (DIMS)	✓	-
Incident response management	✓	-
Data-protection-friendly default settings (privacy by default)	✓	-
Employment of a data protection and information security officer who is integrated into the operational processes	✓	-