



AARHUS
UNIVERSITY

Digital Sovereignty

Security and privacy

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1 Executive Summary

The purpose of this report is to examine, expand and define the organization's current dependency on non-EU technology, evaluate the key risks associated with this direction, analyse and propose EU alternatives. The goal is to identify and map a road to digital Sovereignty.

The current political climate is quite inhospitable and it has become apparent that world leaders make drastic, snap decisions that bring large implication to the technological landscape, where big tech can be leveraged as political thus inherently changing the risk of reliance on such services. Thus companies, with such reliances, risks getting caught in the crossfire.

Services where there is a heavy reliance, from companies such as *Microsoft*, which hosts Azure Active Directory (AD), used for identity management and *SharePoint* and *OneDrive*, which Lifeline Health Technologies (LHT) uses as a file sharing service, could suddenly become unavailable.

A loss of this service, which would be tantamount to loss of many years of technological IPs and achievements which could lead to unquantifiable damage to the company. Thus, in this inclement weather, a EU alternative for these services, is quintessential.

The main findings of this report is an overreliance on

- Microsoft Azure Services, where cloud hosting is indeterminate and jurisdictional exposure is somewhat vague. Thus EU laws may be hard to apply
- process and regulatory mismatches - Data is easily given up to 3rd party cloud services without regard for compliance (EU MDR)
- A thorough documentation is needed of other cloud solutions, specifically regarding SaaS tools
- main risks

Examples for some EU-alternatives :

- Univention - German based software for identity & access management. A self hosted AD, requiring a virtual machine. Can then handle all authentication, along with other features such as single sign-on (SSO) and multifactor authentication (MFA)
- Scaleway - A cloud hosting service, to host VM's for infrastructure purposes.

Thus Univention can be hosted by Scaleway, thus removing the dependency on a Microsoft service. In addition, the company's productivity suite, can be replaced by libre-office

1.1 overall conclusion

2 Introduction

This report addresses the current and ongoing challenges that is present within Lifeline Health Technologies ApS due to the merger between Mediscan ApS, an established manufacturer of ultrasound electronics equipment for the health industry. And HealthSync Mobile ApS (HSM), a younger, digital health oriented company. The two former companies originates from two different times, with differing missions and complex implementations.

The complexity created by this merger and associated difficulties, due to differing IT-landscapes, has prompted the executive team, to commission this report to highlight, identify and analyse the requirements and dependencies, related to digital Sovereignty with a focus on non-EU providers. The purpose of this report therefore becomes to identify risks within the newly formed, yet disjointed, IT environment which LHT has inherited, with its included assets, and how dependencies could cause problems regarding regulatory compliance, operation stability and long-term autonomy from non-EU actors.

The scope of this report covers the broader themes of digital Sovereignty, including identity and access management, data-storage, infrastructure and process mismatches, as well as the risk associated with a future migration along with a focus on jurisdictional factors that arises when handling sensitive data or other regulated information.

The overall structure of this report is, an overview of the current technology and service landscape of LHT, and a accompanying dependency analysis. These two tie into the risk assessment of the current status. This is followed by an evaluation of possible EU-alternatives to implemented services and comparison of the current implementation. Lastly a recommended migration Strategy is proposed.

3 Current Technology and Service Landscape

As a result of the merger between Mediscan ApS and HealthSync Mobile ApS, the IT environment, inherited to LHT, is comprised of two very different digital landscapes. These differences go beyond mere technological platforms, such as tools chosen for various tasks, but also diverging philosophies. This leaves LHT to operate in a Hybrid environment, where some parts of the company use incompatible identity systems, inconsistent governance practices and service providers that might not be a perfect fit for EU regulations.

3.1 Mediscan technology landscape

Mediscan originates from traditional engineering practices, around product development, production, calibration and quality assurance. These include:

- On-prem EU-local infrastructure, where the whole IT system is segmented into various sub networks, for engineering, manufacturing and servers.
- Local AD controllers, running on older operating systems, with weak overall governance
- Weak network security regarding hardware, older switches with no updates
- No MFA and relying on password update rotations

The infrastructure inherited from Mediscan, shows strong preference to local storage and authentication along with a typical product first approach, where cybersecurity is seen as a hindrance.

3.2 HealthSync Mobile's technology landscape

HSM operates a rather modern technology environment, based in the new cloud computing era. With a heavy reliance on popular service providers such as the Microsoft Azure suite, Google Cloud and other SaaS products. These include:

- An extensive implementation of Azure services such as: AD, Kubernetes, Cosmos DB, PostgreSQL, Key Vault, API management, blob storage and monitor + application insights.
- Heavy reliance on CI/CD pipelines and API updates, from non-EU cloud hosted services.
- JSON/WIRE-formatted data.
- Enforced MFA, and OAuth2 + OpenID for access to apps

HSM's modern Technology stack, which historically has granted them the capability for rapid expansion and growth comes at the cost of strong ties to non-EU governed cloud services. Which could become subject to outside EU regulation.

3.3 The hybrid environment post merger

The post-merger leaves LHT with a partially integrated and partially improved hybrid network, currently consisting of:

- The legacy on-prem VLAN of Mediscan's solution for manufacturing and engineering
- HSM's Azure environment and dependencies
- Site-to-site VPN between the two company environments

Inconsistent and overlapping infrastructures creates uncertain flow between different parts of the company. This poses unknown and unmitigated risks, which could be leveraged as attack vectors and entry points.

3.4 Identity and Access management

An important integration issue is the overlapping domains, which results in some users need separate accounts to access multiple services. This leads to multiple services for the same purpose. This also introduces conflicting policies.

- Some users having multiple accounts, both on-prem and cloud.
- Azure AD policy, excludes the use of legacy hardware primarily found in Mediscan
- Inconsistent access rollout to internal file services such as Sharepoint.

Unnecessarily complicated access controls, which would require significant changes to the operation of the company infrastructure.

4 Dependency Analysis

4.1 Purpose

It is imperative that we're aware who our service providers are, this is to prevent certain types of attacks, such as those aimed at our supply chain. If we don't commit do out due diligence in vetting the providers, we are make ourselves vulnerable, which could undermine the efforts to ensure the safety of the company.

4.2 Dependency mapping

From the merger, HLS has inherited a multitude of dependencies. In the section below, the different types are listed:

4.2.1 A. Cloud infrastructure Dependencies

- Azure
 - Azure DevOps
 - Azure functions, to deploy custom script for legacy HL7 v2 conversion.
- Google Cloud services

4.2.2 B. Identity & Access management Dependencies

- Azure
 - Azure AD
 - Azure AD connect
 - Azure B2C
- On-prem AD

4.2.3 C. Application & SaaS Dependencies

- GitHub
- Microsoft Teams
- Slack

4.2.4 D. Security & Monitoring Dependencies

- Cisco
 - Cisco ASA firewall, last firmware update from 2020 - legacy
 - multiple managed Cisco ethernet switches
 - VPN - Cisco any connect.
 - VPN - Site-to-Site

4.2.5 E. Data processing & Clinical workflow Dependencies

- Azure
 - Azure Blob storage
 - Azure CosmosDB
- Custom solutions
 - C++ device-configuration tool(local)

- HL7v2 to JSON translation scripts running in Azure functions
- Microsoft
 - OneDrive
 - SharePoint
- DICOM handling

4.2.6 F. Development and Tooling Dependencies

- GitHub
- Terraform

4.3 Current providers and dependency severity

Provider / Service	Jurisdiction	Area	Criticality	Sov. Risk	Lock-in
Microsoft Azure	US	Cloud compute/storage	High	High	X
Azure AD / B2C	US	Identity management	High	High	X
Microsoft 365	US	Collaboration & files	High	High	X
GitHub	US	Source code / CI	High	High	X
Cisco ASA / VPN	US	Network perimeter	High	Medium	X
Cosmos DB	US	Clinical metadata	High	High	X
Azure Functions	US	HL7 ingestion	High	High	X
Slack	US	Communication (legacy)	Medium	Medium	X
Google Cloud	US	Analytics / telemetry	Medium	High	X
On-prem AD	EU	Manufacturing IAM	High	Low	X
Mediscan tools	EU	Device config	Medium	Low	X
AnyConnect VPN	US	Remote access	High	Medium	X

Table 1: Summary of current providers and sovereignty-related dependency severity.

In table: 1 the columns, *Criticality* refers to the company's current dependency on the current implementation. *Sovereignty* Risk explains how much control the company loses over its assets, as they are hosted by these provinces, and lastly *Lock-in* asks the question: "*how difficult would it be for the company to replace this service if we needed to?*".

5 Risk Assessment

Likelihood	Low Impact	Medium Impact	High Impact
Low	Legacy Mediscan tools	—	—
Medium	Cisco hardware dependency	Geopolitical exposure to US providers	Security risks from hybrid identity model
High	—	Operational risk from fragile integration	Legal/Regulatory risk (GDPR, CLOUD Act, Schrems II)
			Strategic autonomy loss from Azure/GitHub lock-in

Table 2: Placement of LHT-specific risks within the risk matrix.

6 EU-Alternatives

7 Comparison of current and proposed solution

8 recommended migration strategy

9 conclusion