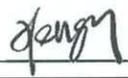


Cloud Service Provider Disclosure (SS 584:2020 MTCS)

The form is to be completed for each cloud service provided. For questions not applicable or not disclosed, indicate accordingly in the remarks.

Date of disclosure: 27 January 2026

Applicable cloud service(s): Infrastructure as a Service, Storage as a Service

Cloud Service Provider Contact Information	
Company name:	<u>SPTel Pte Ltd</u>
Primary address:	<u>3, Ang Mo Kio Electronics Park Road, #03-02, Singapore 567714</u>
Web address:	<u>www.sptel.com</u>
Contact name:	<u>Heng Kwee Tong</u>
Contact number:	<u>6982 6888</u>
Contact email:	<u>kweetong.heng@sptel.com</u>
MTCS certificate number:	<u>SCS 103709CS</u>
Company stamp:	Company representative signature: <u></u>
Certification Body Contact Information	
Company name:	<u>SOCOTEC Certification Singapore Pte Ltd</u>
Web address:	<u>www.socotec-certification-international.sg</u>
Contact name:	<u>Neliza FITRI</u>
Contact number:	<u>6299 9001</u>
Contact email:	<u>neliza@socotec.com</u>
Company stamp:	Lead auditor signature: <u> Nur Shabeera</u>
Cloud Service Provider Background	
Overview of service offering: Provision of SPTel Edge Cloud Services using the IaaS Model. The in-scope service for the IaaS Model: Virtual Machine as a Service Storage as a Service Locations for the IaaS Service: East, Singapore West, Singapore North, Singapore Central, Singapore	
Service model: <input checked="" type="checkbox"/> Virtual machine instances owned by the cloud service customer <input type="checkbox"/> Network facilities	

Compliance with applicable standards

Deployment model:

Private cloud

Community cloud

Hybrid cloud

Public cloud

Tier:

Level 1

Level 2

Level 3

No.	Criteria	Description	Remarks
Legal and Compliance			
1.	Right to audit	<p>The cloud service customer has the right to audit:</p> <p><input checked="" type="checkbox"/> Virtual machine instances owned by the cloud service customer</p> <p><input type="checkbox"/> Network facilities</p> <p><input checked="" type="checkbox"/> Compliance with applicable standards</p> <p><input type="checkbox"/> Technical controls</p> <p><input checked="" type="checkbox"/> Policies and governance</p> <p><input type="checkbox"/> Data centre facilities</p> <p><input type="checkbox"/> Others _____</p> <p><input type="checkbox"/> None</p> <p>Regulators recognised by Singapore law have the right to audit:</p> <p><input checked="" type="checkbox"/> Virtual machine instances owned by the cloud service customer</p> <p><input checked="" type="checkbox"/> Network facilities</p> <p><input checked="" type="checkbox"/> Compliance with applicable standards</p> <p><input checked="" type="checkbox"/> Technical controls</p> <p><input checked="" type="checkbox"/> Policies and governance</p> <p><input checked="" type="checkbox"/> Data centre facilities</p> <p><input type="checkbox"/> Others _____</p>	<p>SPTel adheres to a Shared Responsibility Matrix, in which SPTel maintains responsibility for the physical controls at its data centres. Auditing for most layers and controls remains the responsibility of the customer.</p>

		<input type="checkbox"/> None Audit / assessment reports that can be made available on request: <input type="checkbox"/> Penetration test <input type="checkbox"/> Threat and vulnerability risk assessment <input checked="" type="checkbox"/> Vulnerability scan <input checked="" type="checkbox"/> Audit reports (e.g. Statement on Standards for Attestation Engagements (SSAE) No. 16, Reporting on Controls at a Service Organisation)	
2.	Compliance	The following guidelines / standards / regulations are adhered to: <input checked="" type="checkbox"/> Singapore Personal Data Protection Act <input checked="" type="checkbox"/> ISO/IEC 27001 <input type="checkbox"/> ISO 9000 <input type="checkbox"/> ISO/IEC 20000 <input type="checkbox"/> CSA Open Certification Framework <input type="checkbox"/> PCI-DSS <input type="checkbox"/> Others _____	
Data Control			
3.	Data ownership	All data on the cloud service is owned by the cloud service customer except for: _____ The cloud service customer retains the ownership on the derived data or attributes of cloud usage except for the following: <input type="checkbox"/> Advertising or marketing <input checked="" type="checkbox"/> Statistics analysis on usage <input type="checkbox"/> Others _____	
4.	Data retention	Data deleted by the cloud service customer is retained as follows: <input type="checkbox"/> Minimum data retention period is: _____ <input type="checkbox"/> Maximum data retention period is: _____ <input checked="" type="checkbox"/> Deleted immediately Log data is retained for a period of: <input checked="" type="checkbox"/> Minimum data retention period as follows: 24 hours	

		<input type="checkbox"/> Maximum data retention period is: <u>14 days</u> <input type="checkbox"/> Not retained Cloud service customer data is retained for a period of: <input type="checkbox"/> Minimum data retention period is: _____ <input checked="" type="checkbox"/> Maximum data retention period is: <u>60 days</u> <input type="checkbox"/> Not retained The following types of data are available for download by the cloud service customer: <input checked="" type="checkbox"/> Log data <input checked="" type="checkbox"/> Others <u>Backups</u>	
5.	Data sovereignty	The primary data locations are: <input checked="" type="checkbox"/> Singapore <input type="checkbox"/> Asia Pacific _____ <input type="checkbox"/> Europe _____ <input type="checkbox"/> United States <input type="checkbox"/> Others _____ The backup data locations are: <input checked="" type="checkbox"/> Singapore <input type="checkbox"/> Asia Pacific _____ <input type="checkbox"/> Europe _____ <input type="checkbox"/> United States <input type="checkbox"/> Others _____ No. of countries in which data centres are operated: <u>1</u> The cloud service customer's data stored in the cloud environment will never leave the locations specified in item 5: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> Yes, except as required by law <input type="checkbox"/> Yes, except as noted: _____	

		<input type="checkbox"/> No Cloud service customer's consent is required prior to transferring data to a location not specified in item 5 or a third party: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> Yes, except as required by law <input type="checkbox"/> Yes, except as noted: _____ <input type="checkbox"/> No <i>Note: Cloud service customers are responsible for determining the impact of data protection and data sovereignty laws on the locations where data is stored. In addition, cloud service customers should understand the risks associated with relevant laws that may allow for law enforcement or other government access to data in-transit or storage with Cloud Service Providers.</i>	
6.	Non-disclosure	<input checked="" type="checkbox"/> Non-disclosure agreement template can be provided by Cloud Service Provider <input type="checkbox"/> Cloud Service Provider may use customer's NDA (pending legal review)	
Provider Performance			
7.	Availability	The committed network uptime is: <input checked="" type="checkbox"/> <u>99.9</u> _____ % <input type="checkbox"/> Varies according to price plan The committed system uptime is: <input checked="" type="checkbox"/> <u>99.9</u> _____ % <input type="checkbox"/> Varies according to price plan The cloud environment has the following single points of failure: <input type="checkbox"/> _____ <input checked="" type="checkbox"/> none	
8.	3 rd party dependency	Highlight areas of critical dependency for service delivery: _____ _____	
9.	BCP / DR	<input checked="" type="checkbox"/> Disaster recovery protection	

		<input checked="" type="checkbox"/> Backup and restore service <input checked="" type="checkbox"/> Cloud service customer selectable backup plans <input type="checkbox"/> Escrow arrangements <input type="checkbox"/> No BCP / DR is available <input type="checkbox"/> RPO _____ <input type="checkbox"/> RTO _____ <input type="checkbox"/> Others, please specify: _____ _____	
10.	Liability	<p>The following terms are available for the cloud service customers on failure of the provider to meet the service commitment:</p> <input checked="" type="checkbox"/> Network failure Liability: _____ As per service agreement <input checked="" type="checkbox"/> Infrastructure failure Liability: _____ As per service agreement <input checked="" type="checkbox"/> Virtual machine instance failure Liability: _____ As per service agreement <input type="checkbox"/> Migrations Liability: _____ <input checked="" type="checkbox"/> Unscheduled downtime Liability: _____ As per service agreement <input checked="" type="checkbox"/> Database failure Liability: _____ As per service agreement <input type="checkbox"/> Monitoring failure Liability: _____	
11.	Shared responsibility	<input checked="" type="checkbox"/> Communication of shared roles & responsibilities for which CSC needs to implement and manage for use of this cloud service URL (or attach file): _____	
Service Support			
12.	Change management	The Cloud Service Provider has established the following for changes, migrations, downtime, and other potential interruptions to cloud services:	

		<input checked="" type="checkbox"/> Communication plan and procedures for proactive notification <input type="checkbox"/> Assistance in migration to new services when legacy solutions are discontinued <input type="checkbox"/> Ability to remain on old versions for a defined time period <input type="checkbox"/> Ability to choose timing of impact	
13.	Self-service provisioning and management portal	Provide self-service provisioning and management portal for cloud service customers to manage cloud services: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes, describe the functions of the self-service provisioning and management portal provided: <input checked="" type="checkbox"/> Allow role-based access control (RBAC) <input checked="" type="checkbox"/> Manage resource pools (e.g. VMs, storage, and network) and service templates <input type="checkbox"/> Track and manage the lifecycle of each service <input checked="" type="checkbox"/> Track consumption of services <input checked="" type="checkbox"/> Health monitoring <input type="checkbox"/> Others: _____ _____	
14.	Incident and problem management	Delivery mode of support: <input checked="" type="checkbox"/> Access via email <input checked="" type="checkbox"/> Access via portal <input checked="" type="checkbox"/> Access via phone support <input type="checkbox"/> Direct access to support engineers Availability of support: <input checked="" type="checkbox"/> 24 x 7 <input type="checkbox"/> During office hours support, please specify the hours of operations: _____ <input type="checkbox"/> After office hours support, please specify the hours of operations: _____ Service response time:	

		<p>Notification time of cloud service outage incident: _____</p> <p>Communication channel used for notification of cloud service outage incident: _____</p> <p>The following are available to cloud service customers upon request:</p> <p><input checked="" type="checkbox"/> Permanent access to audit records of customer instances</p> <p><input checked="" type="checkbox"/> Incident management assistance</p> <p>Incident response time: _____</p> <p>Mean time to repair on detection of faults: _____</p>	
15.	Billing	<p>The following billing modes are available (please elaborate granularity of charges and measurement):</p> <p><input checked="" type="checkbox"/> Pay per usage hourly (up to per min/hour/day/month for compute/storage for IaaS/PaaS, and per cloud service customer per hour/day/month/year for SaaS)</p> <p><input checked="" type="checkbox"/> Fixed pricing minimum 12 month contract (up to yearly/monthly/daily)</p> <p><input type="checkbox"/> Other pricing model _____</p> <p><input type="checkbox"/> Not disclosed</p> <p><input type="checkbox"/> Available billing history: _____ months</p>	
16.	Data portability	<p>Importable VM formats: <u>Industry Standard formats</u></p> <p>Downloadable formats: <u>JSON/XML/other open formats (to specify Standard export formats)</u></p> <p>Supported operating systems: _____</p> <p>Language versions of supported operating systems: _____</p> <p>Supported database formats: _____</p> <p>Policy/guide available: _____</p> <p>API:</p> <p><input type="checkbox"/> Common _____</p> <p><input type="checkbox"/> Customised _____</p> <p>Upon service termination or prolonged outage, data is available through: _____</p>	

		<input type="checkbox"/> Physical media <input checked="" type="checkbox"/> Standard methods as described above <input type="checkbox"/> Other methods _____ _____	
17.	Interoperability	Use of industry standards and availability of APIs to support interoperability: <input checked="" type="checkbox"/> Transport supported (e.g. REST based HTTPS/MQTT) _____ <input checked="" type="checkbox"/> Format supported (e.g. JSON/XML) _____ <input checked="" type="checkbox"/> APIs supported <u>OpenAPI</u> <input type="checkbox"/> Other methods _____ _____ Guide available _____	
18.	Access	Type of access to the service is through: <input checked="" type="checkbox"/> Public access <input checked="" type="checkbox"/> Private access (e.g. VPN, dedicated link) <input checked="" type="checkbox"/> IPv6 access is supported <input type="checkbox"/> Other access methods _____ _____ Public access speed (shared bandwidth) in Mbps: _____	
19.	User management	<input checked="" type="checkbox"/> Identity management <input checked="" type="checkbox"/> Role based access control <input checked="" type="checkbox"/> Federated access model <input checked="" type="checkbox"/> Integration with Identity management solutions <input type="checkbox"/> Others _____	
20.	Lifecycle	The cloud service customer may select the following for service upgrades and changes: <input checked="" type="checkbox"/> Automatic provisioning <input checked="" type="checkbox"/> Cloud service customer customisable provisioning	

Security Configurations			
21.	Security configuration enforcement checks	<p>Security configuration enforcement checks are performed:</p> <p><input type="checkbox"/> Manually</p> <p><input checked="" type="checkbox"/> Using automated tools</p> <p>How often are enforcement checks being performed to ensure all security configurations are applied?</p> <p>_____</p>	
22.	Multi-tenancy	<p><input checked="" type="checkbox"/> Distinct physical hosts</p> <p><input checked="" type="checkbox"/> Distinct physical network infrastructure</p> <p><input checked="" type="checkbox"/> Virtual instance grouping</p> <p><input checked="" type="checkbox"/> Cloud service customer definable security domains</p> <p><input checked="" type="checkbox"/> Cloud service customer customisable firewall</p> <p><input checked="" type="checkbox"/> Cloud service customer definable access policies</p>	
23.	Hybrid cloud provision	<p>Ability to monitor, track, apply and enforce CSC's security & privacy policies on its cloud workloads:</p> <p><input type="checkbox"/> Data protection and encryption key mgmt. enforcement geolocation-based/resource pools and secure migration of cloud workloads</p> <p><input type="checkbox"/> Key mgmt. and keystore controlled by CSC</p> <p><input type="checkbox"/> Persistent data flow segmentation before and after geolocation-based/resource pools secure migration</p> <p><input type="checkbox"/> Compliance enforcement for regulated workloads between on-premises private and hybrid/public cloud</p> <p><input type="checkbox"/> Others _____</p>	
Service Elasticity			
24.	Capacity elasticity	<p>The following capacity elasticity options are available:</p> <p><input checked="" type="checkbox"/> Programmatic interface to scale up or down</p> <p><input checked="" type="checkbox"/> Mean time to start and end new virtual instances ^{Industry standards} _____</p> <p><input checked="" type="checkbox"/> Alerts to be sent for unusual high usage</p> <p><input type="checkbox"/> Minimum performance during peak periods _____</p> <p><input type="checkbox"/> Minimum duration to scale up computing resources _____</p> <p><input checked="" type="checkbox"/> Minimum additional capacity guaranteed per account</p>	

		_____ (number of cores and GB memory)	
25.	Network resiliency and elasticity	<p>The following network resiliency and elasticity options are available:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Redundant Internet connectivity links <input checked="" type="checkbox"/> Redundant Internal connectivity <input type="checkbox"/> Selectable bandwidth up to _____ Mbps <input checked="" type="checkbox"/> Maximum usable IPs <small>each VM will come with 1 IP, more can be requested in the console</small> <input type="checkbox"/> Load balancing ports _____ <input type="checkbox"/> Load balancing protocols _____ <input checked="" type="checkbox"/> Anti-DDOS protection systems or services <input checked="" type="checkbox"/> Defence-in-depth mechanisms, please specify: _____ _____ <input checked="" type="checkbox"/> Network traffic isolation, please specify: _____ _____ <input checked="" type="checkbox"/> Shared or dedicated bandwidth, please specify: _____ _____ <input checked="" type="checkbox"/> QoS traffic control services <input type="checkbox"/> Alerts to be sent for unusual high usage <input type="checkbox"/> Minimum performance during peak periods _____ <input type="checkbox"/> Minimum period to scale up network throughput _____ 	
26.	Storage redundancy and elasticity	<p>The following storage redundancy and elasticity options are available:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Redundant storage connectivity links within each data centre <input checked="" type="checkbox"/> Redundant storage connectivity links between data centres belonging to the same cloud <input checked="" type="checkbox"/> Storage traffic isolation, please specify: _____ _____ <input checked="" type="checkbox"/> Shared or dedicated storage network bandwidth, please specify: <small>Minimum 10Gbps</small> _____ <input checked="" type="checkbox"/> Quality of service storage traffic control services <input checked="" type="checkbox"/> Maximum storage capacity for entire cloud, please specify: <small>Maximum Storage per VM Instance is 62TB</small> 	

	<p><input checked="" type="checkbox"/> Maximum storage capacity for single cloud service customer, please specify: Maximum Storage per VM Instance is 62TB _____</p> <p><input checked="" type="checkbox"/> Maximum expandable storage, please specify: _____</p> <p><input type="checkbox"/> Alerts to be sent for unusual high usage</p> <p><input type="checkbox"/> Minimum storage I / O performance during peak periods _____</p> <p><input type="checkbox"/> Minimum period to scale up storage I / O throughput _____</p>	
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