

# UK General Data Protection Regulation — Compliance Attestation

## Introduction

This document constitutes Akka's formal attestation of compliance with the UK General Data Protection Regulation (UK GDPR) as retained in UK law by the European Union (Withdrawal) Act 2018, together with the Data Protection Act 2018. It is intended for customers, prospects, and auditors seeking assurance about Akka's personal data processing practices as they relate to UK data subjects.

This attestation is made by Akka's Chief Information Security Officer and reflects the state of Akka's UK GDPR compliance programme as of the date shown below. It is subject to annual review.

Note: Of Akka's 36 UK GDPR controls, one is currently rated High risk and is being actively addressed under Akka's formal remediation plan, with a defined target completion date. All other controls are fully implemented. This remediation activity does not affect Akka's overall Compliant status but is disclosed here in the interest of transparency.

## Scope

Akka Technologies, Inc. ("Akka") is a US-headquartered technology company providing the Akka platform — a reactive microservices and distributed systems toolkit — as both a SaaS offering and open-source SDKs. Akka processes personal data of UK data subjects in the course of:

- Operating its SaaS platform and developer portals accessed by UK customers and developers
- Managing commercial relationships with UK enterprise customers
- Processing account data, usage data, and support communications from UK individuals
- Acting as a data processor for personal data that UK customers choose to process using the Akka platform

Akka acts as both a data controller (for its own customer relationship and account data) and a data processor (for data processed by customers through the Akka platform). As a non-UK company processing personal data of UK individuals, Akka is subject to the UK GDPR. International transfers of UK personal data to the US are conducted using the ICO's International Data Transfer Agreement (IDTA) and/or the ICO-approved addendum to the EU Standard Contractual Clauses.

## Compliance Posture

Akka has implemented a comprehensive UK GDPR compliance programme. As of the attestation date:

- Total controls: 36
- Controls Implemented: 36 (100%)
- Controls Not Applicable: 0
- Risk profile: 1 High (under active remediation), 20 Medium, 15 Low
- Compliance status: Compliant

Akka maintains an ISO 27001-aligned Information Security Management System (ISMS) that provides the governance framework for UK GDPR compliance. Privacy-by-design principles are embedded in Akka's development lifecycle.

## Key Controls

### Lawful Basis and Transparency

Akka identifies and documents a lawful basis for each category of personal data processing activity. Lawful bases used include contractual necessity (processing required to perform the contract with customers), legitimate interests (product analytics, security monitoring), and consent (marketing communications). Akka's Privacy Policy, available at akka.io, transparently describes the purposes and legal bases for processing in plain language accessible to UK data subjects.

### Data Subject Rights

Akka has implemented procedures to respond to all eight UK GDPR data subject rights: the right to be informed, right of access, right to rectification, right to erasure, right to restrict processing, right to data portability, right to object, and rights related to automated decision-making. Requests are logged, acknowledged, and fulfilled within the statutory one-month timeframe. Where requests cannot be fulfilled, individuals are informed with reasons and advised of their right to complain to the ICO.

### Records of Processing Activities (ROPA)

Akka maintains a Register of Processing Activities (ROPA) documenting all personal data processing activities, the categories of data subjects and personal data involved, the purposes of processing, the legal basis, retention periods, and the categories of recipients including

sub-processors and international transfers. The ROPA is reviewed and updated at least annually and whenever a material change to processing activities occurs.

## International Data Transfers

Akka transfers personal data of UK data subjects to the US (where Akka is headquartered) and to sub-processors located outside the UK. All such transfers are conducted under appropriate safeguards: Akka uses the ICO's International Data Transfer Agreement (IDTA) or the ICO-approved addendum to the EU Standard Contractual Clauses for transfers to Akka's US entity, and requires equivalent contractual protections from all significant sub-processors.

## Privacy by Design and Data Minimisation

Akka embeds privacy-by-design and data-minimisation principles into its product development lifecycle. Data Protection Impact Assessments (DPIAs) are conducted for new processing activities that are likely to result in high risk to individuals. Personal data collected is limited to what is necessary for the specified purposes, and default settings are configured to process the minimum data required.

## Security of Processing

Akka implements appropriate technical and organisational measures to ensure a level of security appropriate to the risk of processing, including:

- Encryption of personal data at rest (AES-256) and in transit (TLS 1.2+)
- Pseudonymisation of personal data where appropriate
- Role-based access controls and least-privilege principles
- Multi-factor authentication for all internal systems

- Continuous vulnerability management and annual penetration testing
- Defined business continuity and disaster recovery procedures

Akka's infrastructure is hosted on Amazon Web Services and Google Cloud Platform, both of which hold current SOC 2 Type II certifications and provide strong contractual data protection commitments.

## Breach Notification

Akka maintains a documented personal data breach response procedure. In the event of a breach likely to result in a risk to the rights and freedoms of UK individuals, Akka will notify the Information Commissioner's Office (ICO) within 72 hours of becoming aware of the breach, as required by UK GDPR Article 33. Where a breach is likely to result in a high risk to individuals, those individuals are also notified without undue delay. Breach response procedures are tested as part of Akka's annual incident response exercise.

## Supporting Evidence

Akka's compliance with the UK GDPR is supported by the following evidence:

- Published Privacy Policy at akka.io incorporating UK GDPR transparency requirements
- Register of Processing Activities (ROPA) maintained and reviewed annually
- International Data Transfer Agreements (IDTAs) with UK customers and sub-processors
- Data Processing Agreements with all significant sub-processors
- SOC 2 Type II reports from Amazon Web Services and Google Cloud Platform
- ISO 27001-aligned ISMS with documented UK GDPR controls

- DPIA process integrated into the product development lifecycle
- Personal data breach response procedure with 72-hour ICO notification commitment
- Employee data protection awareness training records

## Conclusion

Akka is fully compliant with the UK General Data Protection Regulation. All 36 controls in Akka's UK GDPR programme are implemented. One High-risk control is currently subject to active remediation with a defined target completion date; all remaining controls are rated Medium or Low risk. Akka's UK GDPR programme is subject to annual review within the ISMS.

This attestation is available to customers and prospects on request and may be shared under the terms of Akka's standard non-disclosure agreement.

### Signed:

**Michael Nash**

Chief Information Security Officer

Akka Technologies, Inc.

michael.nash@akka.io

Date: 20 April 2026