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SOVEREIGN CLOUD

COMPLIANCE PILLARS & READINESS SCORECARD

BY INFOSPRINT TECHNOLOGIES | 2026 EDITION

WHY SOVEREIGN CLOUD MATTERS

Cloud adoption solved scalability and innovation challenges.
But it also introduced new risks around data jurisdiction, regulatory exposure, and control over sensitive workloads.

Regulatory Pressure

Global data laws such as GDPR, NIS2, DORA, and India's DPDP Act are forcing organizations to control where and how data is stored.

Jurisdiction Risks

Even when data is stored locally, foreign legal frameworks like the U.S. CLOUD Act may still allow access.

AI & Data Sovereignty

Enterprises want to run AI models on proprietary data but cannot expose sensitive datasets to external platforms.

Geopolitical Uncertainty

Trade conflicts, sanctions, and political tensions are making dependency on foreign cloud infrastructure a strategic risk.

FROM COMPLIANCE COST TO STRATEGIC ADVANTAGE

Many organizations initially view sovereign cloud as a compliance requirement — another cost imposed by regulators.

That perspective misses the bigger picture.

Enterprises that approach sovereignty strategically are beginning to treat it as a competitive differentiator. The ability to operate confidently in regulated markets, deploy AI workloads without jurisdictional risk, and demonstrate strong data governance to customers and regulators can become a significant advantage.

Instead of asking “What will sovereignty cost us?”, ask a different question: “What capabilities does sovereignty unlock?”

COMPLIANCE PILLARS

STEP 1	Not every workload needs to be in a sovereign environment. Identify which workloads carry personal data, regulated data, intellectual property, or AI training sets. These are your priority tier.
STEP 2	Understand which of your cloud providers are subject to Cloud Act jurisdiction, even if your data sits in a local region. This is the conversation your legal team needs to have before your next contract renewal.
STEP 3	Build a hybrid model: general workloads on hyperscalers for cost and scale; regulated, sensitive, and AI workloads on sovereign infrastructure. You do not need to move everything.
STEP 4	Customer-managed encryption keys, open APIs, and portability clauses mean your compliance architecture doesn't belong to your vendor. Negotiate these into every contract.
STEP 5	Faster AI deployment in regulated environments, reduced breach liability, lower compliance overhead, and market access to sovereignty-requiring sectors are all measurable returns.

SOVEREIGN CLOUD READINESS SCORECARD

Q1. Which regulatory frameworks govern your organisation's data obligations?

- ☐ No specific framework — general IT governance only
- ☐ One framework (e.g., GDPR or ISO 27001)
- ☐ Multiple frameworks (e.g. GDPR + DORA + NIS2)
- ☐ Sector-specific mandates across multiple jurisdictions

Q2. Have you assessed whether your cloud provider is subject to US CLOUD Act jurisdiction — even for data stored in European or Asian regions?

- ☐ We haven't considered this
- ☐ We're aware of it, but haven't formally assessed it
- ☐ We've assessed it — partial mitigations are in place
- ☐ Fully assessed — it is an active compliance concern for us

Q3. How frequently does your organisation face regulatory audits or evidence requests related to data governance?

- [ ] Rarely or never
- [ ] Annually — manageable effort
- [ ] Quarterly — increasing compliance overhead
- [ ] Continuously, compliance is a high operational cost

Q4. Do you operate in industries with mandatory data localisation requirements (financial services, healthcare, government, defence)?

- [ ] No — our sector has no localisation mandates
- [ ] Partially — some business units have localisation requirements
- [ ] Yes — significant portions of data must stay in-country
- [ ] Yes — all critical data is subject to strict localisation law

Q5. Are AI or machine learning workloads part of your 12-month technology roadmap?

- [ ] No AI plans in the near term
- [ ] Exploring AI pilots — nothing in production
- [ ] AI pilots underway — working toward production deployment
- [ ] AI is a core business priority — urgent to move to production

Q6. What types of sensitive data does your organisation store in the cloud?

- [ ] No sensitive data — general business systems only
- [ ] Some PII or confidential business data
- [ ] PII + financial records + proprietary IP
- [ ] All of the above, plus state-adjacent or regulated data

Q7. Have AI or data analytics projects been delayed or blocked due to legal, privacy, or data governance concerns?

- [ ] No — data governance hasn't impacted our AI plans
- [ ] Minor friction — resolved case by case
- [ ] Significant delays — the legal team frequently blocks data use
- [ ] AI projects are actively stalled due to data governance

Q8. Do you have contractual or legal obligations preventing customer data from leaving national borders?

- [ ] No such obligations exist for our data
- [ ] Some customers have data residency clauses — manageable today
- [ ] A growing portion of customers require in-country data processing
- [ ] Strict legal obligations prevent cross-border data transfer

Q9. How many distinct geopolitical jurisdictions does your organisation operate in?

- [ ] Single country — no cross-border operations
- [ ] 2–3 countries, broadly aligned regulatory environments
- [ ] Multiple regions with differing regulatory frameworks
- [ ] Global operations across jurisdictions with active tensions

Q10. Is your primary cloud provider headquartered in a foreign jurisdiction (e.g. a US-headquartered company holding EU data)?

- [ ] No — we use local or in-jurisdiction providers
- [ ] Partially — mixed provider portfolio
- [ ] Yes — one major foreign-HQ hyperscaler dominates
- [ ] Yes — all critical infrastructure is with foreign-HQ providers

Q11. Has your board or executive team explicitly raised geopolitical cloud risk as a business continuity concern?

- [ ] No — not on the agenda
- [ ] Mentioned informally — not a formal risk item
- [ ] On the risk register — under review
- [ ] Active board-level concern with a mandate to address it

Q12. Do you have a tested business continuity plan if your primary cloud provider became unavailable due to sanctions or political disruption?

- [ ] No continuity plan exists for this scenario
- [ ] General DR plan exists — doesn't cover provider unavailability
- [ ] Plan exists — not tested for provider-loss scenarios
- [ ] Fully tested continuity plan, including provider-loss scenarios

Q13. How do you currently manage encryption keys for sensitive cloud workloads?

- [ ] Provider-managed keys — default configuration
- [ ] Some customer-managed keys in specific environments
- [ ] Customer-managed keys (CMEK) broadly deployed
- [ ] BYOK with HSM, zero-trust key architecture across all workloads

Q14. Do you have a documented and enforced data classification and residency policy?

- [ ] No formal policy — data governance is informal
- [ ] Policy exists — inconsistently applied
- [ ] Policy enforced for regulated systems — gaps in others
- [ ] Comprehensive policy enforced across all systems with an audit trail

Q15. How portable is your current cloud architecture across different providers?

- [ ] Deeply locked in — proprietary services throughout
- [ ] Partially portable — some open standards, significant dependencies
- [ ] Mostly portable — containerised workloads, open APIs
- [ ] Fully portable — multi-cloud by design, exit tested

Q16. Do you have automated, continuous compliance monitoring with real-time reporting?

- [ ] Manual processes — point-in-time audits only
- [ ] Some automation — significant manual effort remains
- [ ] Mostly automated — some gaps in coverage
- [ ] Fully automated compliance monitoring with continuous output

Q17. What is your team's current experience with sovereign cloud or data sovereignty architecture?

- [ ] No experience — this is a new domain for us
- [ ] Awareness level — reading and internal discussion only
- [ ] Practical experience — sovereign concepts applied in projects
- [ ] Deep expertise — sovereign cloud architecture is a core competency

Q18. Do you have a dedicated cloud governance or Cloud Centre of Excellence function?

- [ ] No dedicated function — governance is ad hoc
- [ ] Informal group — no dedicated resources or mandate
- [ ] Formal function with defined scope — still maturing
- [ ] Mature CoE with sovereign, security, and compliance remit

Q19. Have you negotiated cloud exit clauses and tested workload migration procedures with your current provider?

- [ ] No exit planning — fully dependent on current provider
- [ ] Exit clauses negotiated — migration never tested
- [ ] Exit procedures documented — partial testing completed
- [ ] Full exit playbook with tested, repeatable migration procedures

Q20. How prepared is your DevOps/platform engineering team for sovereign boundary constraints (pipeline restrictions, registry limits, AI inference rules)?

- [ ] Not prepared — no awareness of sovereign constraints
- [ ] Aware of constraints — no implementation experience
- [ ] Partially adapted — some pipelines updated for sovereignty
- [ ] Fully adapted — sovereign-aware pipelines and toolchains in use

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