



FOX ESS POLAND SP. Z O.O.

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FoxESS Overseas Platform Cybersecurity and Data Compliance Statement

FOXESS CO., LTD.

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To our partners and customers in Poland,

1. Background and Purpose

FoxESS is committed to providing safe, reliable, and compliant energy management solutions to users worldwide. With the extensive deployment of our overseas platforms, **Foxcloud** and **Foxcloud 2.0**, we recognize the critical importance of safeguarding user data and meeting the requirements of EU cybersecurity regulations and data privacy protection laws. This statement sets out our specific measures and commitments regarding data storage, cybersecurity protection, and regulatory compliance for our overseas platforms.

2. Data Storage Location and Infrastructure

To meet EU data sovereignty requirements and ensure low-latency, high-reliability data processing, the core data of FoxESS overseas platforms **Foxcloud** and **Foxcloud 2.0** is stored on cloud server infrastructure located in **Frankfurt, Germany**.

The following provides evidence of the actual deployment and network attribution of our infrastructure:

As shown in the figure below, we have deployed dedicated cloud server ECS instances (such as the `eu-business-node` series and `eu-bda-node` series) in Availability Zone A of Frankfurt, Germany. All instances are in stable operation and are isolated using Virtual Private Clouds (VPCs), ensuring physical and logical data security.

实例管理 ECS 实例

资源与网络管理

帮助

实例

创建实例

在控制台

通过控制台快速创建/购买/续费实例

快速

半托管

☐	实例ID / 名称	状态	▼	标签	操作系统	实例	网络	▼	配置	IP 地址	支付方式	▼	网络策略	操作
	实例ID: eu-bds-1234567890 eu-business-node-16	运行中				Linux (Ubuntu 20.04)	专有网络	10.10.10.10	按量付费	2023-01-01 00:00:00	专有网络		续费/重置/删除	
	实例ID: eu-bds-1234567890 eu-business-node-17	运行中				Linux (Ubuntu 20.04)	专有网络	10.10.10.11	按量付费	2023-01-01 00:00:00	专有网络		续费/重置/删除	
	实例ID: eu-bds-1234567890 eu-bds-node-1	运行中				Linux (Ubuntu 20.04)	专有网络	10.10.10.12	按量付费	2023-01-01 00:00:00	专有网络		续费/重置/删除	
	实例ID: eu-bds-1234567890 eu-bds-node-2	运行中				Linux (Ubuntu 20.04)	专有网络	10.10.10.13	按量付费	2023-01-01 00:00:00	专有网络		续费/重置/删除	
	实例ID: eu-bds-1234567890 eu-bds-node-3	运行中				Linux (Ubuntu 20.04)	专有网络	10.10.10.14	按量付费	2023-01-01 00:00:00	专有网络		续费/重置/删除	
	实例ID: eu-bds-1234567890 eu-bds-node-4	运行中				Linux (Ubuntu 20.04)	专有网络	10.10.10.15	按量付费	2023-01-01 00:00:00	专有网络		续费/重置/删除	
	实例ID: eu-bds-1234567890 eu-bds-node-5	运行中				Linux (Ubuntu 20.04)	专有网络	10.10.10.16	按量付费	2023-01-01 00:00:00	专有网络		续费/重置/删除	
	实例ID: eu-bds-1234567890 eu-bds-node-6	运行中				Linux (Ubuntu 20.04)	专有网络	10.10.10.17	按量付费	2023-01-01 00:00:00	专有网络		续费/重置/删除	
	实例ID: eu-bds-1234567890 eu-bds-node-7	运行中				Linux (Ubuntu 20.04)	专有网络	10.10.10.18	按量付费	2023-01-01 00:00:00	专有网络		续费/重置/删除	
	实例ID: eu-bds-1234567890 eu-bds-node-8	运行中				Linux (Ubuntu 20.04)	专有网络	10.10.10.19	按量付费	2023-01-01 00:00:00	专有网络		续费/重置/删除	
	实例ID: eu-bds-1234567890 eu-bds-node-9	运行中				Linux (Ubuntu 20.04)	专有网络	10.10.10.20	按量付费	2023-01-01 00:00:00	专有网络		续费/重置/删除	

Third-party network information queries confirm that the public IP address used by our platform (e.g., 8.209.116.72) belongs to **Alibaba (US) Technology Co., Ltd.** under ASN AS45102, with its physical location clearly identified as **Frankfurt am Main, Hesse, Germany**. The IP is classified as a data center IP, confirming that the servers are located within a strictly controlled data center environment.

8.209.116.72

Search

My IP 52.76.26.128 2406:da18:8a0:2400:f774:336d:2797:2ac IPv4优先

IP

8.209.116.72

ASN

AS45102 – Alibaba (US) Technology Co., Ltd.

位置

IP2Location

Germany, Hessen, Frankfurt am Main

DB-IP

Germany, Hesse, Frankfurt am Main

MaxMind

Germany, Hesse, Frankfurt am Main

IPInfo.io

Germany, Hesse, Frankfurt am Main

Bilibili

德国, 黑森州, 法兰克福

IP来源

广播IP

IP属性

机房IP

FoxESS overseas platforms strictly comply with current and forthcoming EU cybersecurity regulatory requirements. Our system architecture, software

development life cycle, and operational management fully implement the following standards

ETSI EN 303 645: Meets the cybersecurity baseline requirements for IoT devices, ensuring devices and platforms have anti-attack, privacy protection, and security update capabilities.

EN 18031-1:2024 (RED DA): Complies with Article 3.3(d) of the Radio Equipment Directive (RED) regarding network protection, ensuring the security of network transmission and access.

NIS2 Directive (EU) 2022/2555: We have established comprehensive vulnerability management, incident response processes, and continuous monitoring mechanisms (SOC) to meet critical infrastructure cybersecurity requirements.

Cyber Resilience Act (CRA, EU) 2024/2847: Adopting a secure-by-design architecture, we possess a Secure Software Development Life Cycle (SSDLC), cryptographically verified software update mechanisms, and a Bug Bounty program, fully preparing for formal implementation in 2027.

Based on the above standards and testing, we declare that: **the Foxcloud and Foxcloud 2.0 platforms meet the technical requirements of RED DA, EN 303 645, NIS2, and CRA, and are fully prepared for formal compliance.**

4. General Data Protection Regulation (GDPR) Compliance

With respect to the EU General Data Protection Regulation (GDPR, EU 2016/679), FoxESS overseas platforms take the following measures to ensure the lawful and compliant processing of user personal data:

Data Localization and Cross-Border Transfers: As stated above, platform data is primarily stored in the Frankfurt, Germany node, effectively avoiding unnecessary cross-border data transfer risks. Where necessary cross-border transfers occur, we strictly comply with Chapter V of the GDPR, employing lawful mechanisms such as Standard Contractual Clauses (SCCs).

Safeguarding Data Subject Rights: We provide transparent privacy policies and establish accessible channels to guarantee users' rights to access, rectify, erase (right to be forgotten), and port their personal data.

Data Security and Minimization: We strictly adhere to the principle of data minimization, collecting only data necessary for business operations, and employing encrypted storage, strict access controls (IAM), and Virtual Private Cloud (VPC) isolation technologies to prevent data leakage, tampering, or loss.



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Data Protection Impact Assessments (DPIA): For high-risk data processing activities, we regularly conduct DPIAs to ensure privacy protection measures are embedded throughout product and platform design.

5. Conclusion

FoxESS is committed to continuously monitoring and adapting to updates in EU cybersecurity and data protection regulations. Through our high-standard infrastructure in Frankfurt, Germany, our certified cybersecurity framework, and strict adherence to the GDPR, we ensure that the **Foxcloud** and **Foxcloud 2.0** platforms provide secure, compliant, and trustworthy energy data services to users in Europe and worldwide.

Name: Bruce

Position: Pre-sales director

Date: May 12, 2026

Location: No. 939 Jinhaisan Road, Airport New Area, Longwan District, Wenzhou City, Zhejiang Province, China

麦田能源股份有限公司
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