



Questback Group

**Digital Operational Resilience Act
(DORA) Statement for Questback v1.0**

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1. Introduction

The Digital Operational Resilience Act (DORA) is a comprehensive regulatory framework introduced by the European Union aimed at enhancing the operational resilience of the financial sector. DORA applies to a wide range of financial entities including banks, insurance companies, and other financial market infrastructures. It mandates stringent requirements for managing ICT (Information and Communication Technology) risks, ensuring continuity of critical services, and safeguarding the integrity of the financial system.

2. Application and Assessment

DORA primarily targets entities whose operational failure could pose significant risks to the stability and functioning of the financial system. These entities are classified as critical ICT third-party service providers and are subject to rigorous compliance standards and external audits.

3. Questback's Position

At Questback, we understand the importance of DORA and its implications for financial entities. However, based on initial self-assessment led by Article 31 paragraph 2 of DORA Regulation in Official Journal Questback:

- (i) is considered as ICT third-party service provider as it provides software services that support business functions
- (ii) does not qualify as critical ICT third-party service provider

Why Questback is Not a Critical ICT third-party service provider

Questback is classified as a non-critical ICT third-party service provider based on the following key considerations:

Operational Impact

Questback provides valuable survey and feedback solutions that support long-term strategic and tactical decision-making for our clients. However, our services do not directly impact the day-to-day operational continuity of financial institutions.

Unlike core banking systems, payment processing platforms, or other critical financial infrastructure, the unavailability of our services does not pose an immediate risk to the operational stability of financial entities.

Direct Role in Financial Transaction Processing

Questback does not process, facilitate, or support financial transactions, payments, or settlements. Questback's services do not enable essential financial operations, such as payment gateways or securities clearing, where failure could disrupt the financial system.

Risk to Financial Stability

The failure or disruption of Questback's services would not lead to systemic risk or significant disruption in the financial markets.

Our role is more aligned with enhancing business insights and supporting decision-making processes rather than ensuring the seamless operation of financial transactions and services.

Nature of Services

Questback primarily offers tools for gathering and analyzing feedback, which are crucial for improving customer experience, employee engagement, and overall business performance. While these insights are critical for long-term planning and improvement, they are not essential for the immediate operational needs of financial institutions.

Regulatory Perspective

According to DORA, critical ICT third-party service providers are those whose operational failure could have a substantial impact on the stability and functioning of the financial system.

While Questback's services are vital for strategic decision-making, they do not pose a risk of substantial operational disruption or financial instability if a failure occurs.

4. Compliance and Audit Obligations

Being classified as a non-critical ICT third-party service provider, Questback is not subject to the external audits or stringent compliance standards mandated by DORA for critical ICT third-party service provider. This classification provides us with operational flexibility, enabling us to continue delivering high-quality services to our clients.

5. Commitment to Security and Data Privacy

Despite not being a critical ICT third-party service provider, Questback is fully committed to ensuring the highest standards of security and data privacy. We are dedicated to maintaining robust security measures and adhering to GDPR (General Data Protection Regulation) requirements to protect our clients' data.

6. Conclusion

In summary, Questback acknowledges the importance of DORA and supports its objectives to strengthen the operational resilience of the financial sector. Although we are not classified as a critical ICT third-party service provider, we remain committed to maintaining the highest standards of security and data privacy.

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