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DESIGN STUDY

Sovereign placement for a government IT provider: 80 workloads scored against SEAL levels

Complete design on current platforms

CAPABILITY	INDUSTRY	SETTING
Cloud	Public Sector	Government IT provider
DOCUMENT	**VERSION**	**DATE**
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Document control

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Sign-off	"An engagement under this design is signed by the practice lead before any build proceeds."		

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CONVENTIONS

Source tags. [S] figure read from the vendor's or publisher's own current page on Sep 24, 2026, or on Sep 27, 2026 where marked · [S*] figure from the page summary where the page itself could not be opened · [A] design assumption, to be confirmed by the signing engineer · [T] design target: the record's outcome figure and anything derived from it. No figure comes from any engagement, file or asset. A row with more than one tag is counted once: as a published figure if any tag is [S] or [S*], otherwise as an assumption if any tag is [A], otherwise as a design target.

Table 1. Revision history

Date	Version	Change
Sep 27, 2026	1.0	First issue.
Oct 10, 2026	1.1	Approval line now reads: approved by the Founder, issued by Symbeeo. Steve Phillips remains the author.

1 · Scope

Who it is for. The CIO of a regional government's IT service provider who hosts services for the ministries, must decide which of them may run in a public cloud, which in a sovereign cloud and which only in the provider's own buildings, and must show the court of auditors how each decision was reached.

Typical buyer [A]. An EU regional government's IT service provider serving 12 ministries, 80 workloads: 15 public-information services, 50 that hold personal data, 15 that hold restricted data (police support, tax enforcement, crisis staff). Two own data centers 30 km apart. Staff and templates are Azure-based. A public cloud primary is already chosen under SRA-CLD-001 D1.

What is in. The classification rule, the sovereignty assessment of each candidate place under the EU Cloud Sovereignty Framework, the placement of each data class, the restricted-class platform in the client's buildings, the evidence file and its review cycle. This is SRA-CLD-001 R4, R5, R14 and §4.6 applied to one estate. **What is out.** The landing zones and connectivity (CLD-002 and CLD-003 show the pattern); the legal classification of each workload, which is the ministries' and their data-protection officers'; application changes.

Assumptions. The client adopts the framework's method for its own placements, although the framework was written for the Commission's procurement [A]. Minimum SEAL levels per class are the client's to set, as the framework leaves them to the contracting authority [S]. The data-protection officer signs each workload's class [A].

Related documents, read Sep 24, 2026.

- European Commission, Cloud Sovereignty Framework v1.2.1 (read Sep 27, 2026) — https://commission.europa.eu/document/download/09579818-64a6-4dd5-9577-446ab6219113_en
- European Commission, Commission advances cloud sovereignty through strategic procurement (read Sep 27, 2026) — https://commission.europa.eu/news-and-media/news/commission-advances-cloud-sovereignty-through-strategic-procurement-2026-04-17_en
- Amazon, AWS launches AWS European Sovereign Cloud — https://press.aboutamazon.com/aws/2026/1/aws-launches-aws-european-sovereign-cloud-and-announces-expansion-across-europe
- Microsoft, disconnected operations for Azure Local — https://learn.microsoft.com/en-us/azure/azure-local/manage/disconnected-operations-overview
- Microsoft, what's new in Azure Local — https://learn.microsoft.com/en-us/azure/azure-local/whats-new

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- European Commission, Data Act explained — https://digital-strategy.ec.europa.eu/en/factpages/data-act-explained

1c · Public implementations this design follows

Table 2. Public implementations this design follows

Implementation	Who published it · date	What it settles for this design	URL
Sovereign cloud award under the Cloud III dynamic purchasing system: up to EUR 180 million over 6 years, four contracts; eligibility threshold SEAL-2; most awarded providers reached SEAL-3, one SEAL-2	European Commission · Apr 17, 2026 · public deployment	R3, §4.2 and §4.4: SEAL-2 is a floor a buyer has enforced; SEAL-3 was reached by providers developing their own technology, while the offering built on a non-EU provider's cloud technology and operated by EU companies reached SEAL-2	https://commission.europa.eu/news-and-media/news/commission-advances-cloud-sovereignty-through-strategic-procurement-2026-04-17_en
Framework v1.2.1: eight sovereignty objectives SOV-1 to SOV-8, levels SEAL-0 to SEAL-4, a weighted sovereignty score, a minimum SEAL per objective set by the buyer	European Commission, DG DIGIT · October 2025 · published standard, used to build our own design	R2, R4, R5	https://commission.europa.eu/document/download/09579818-64a6-4dd5-9577-446ab6219113_en
AWS European Sovereign Cloud in Brandenburg: "operated exclusively by EU residents", "physically and logically separate from other AWS Regions", more than 90 services at launch	Amazon press release · Jan 15, 2026 · vendor documentation, used to build our own design	§4.3: one candidate for the personal-data class	https://press.aboutamazon.com/aws/2026/1/aws-launches-aws-european-sovereign-cloud-and-announces-expansion-across-europe

2 · Requirements register

Table 3. Requirements register

#	Requirement	Value	Source
R1	Workloads	80 · public 15 · personal 50 · restricted 15	[A]
R2	Assessment method	every candidate place given a SEAL level on each of SOV-1 to SOV-8	[S] framework v1.2.1
R3	Minimum SEAL per class	public SEAL-1 on all; personal SEAL-2 on all; restricted SEAL-3 on SOV-1–4 and SOV-7, SEAL-2 on SOV-5, 6 and 8	[A]
R4	Score weights	SOV-1 15 · SOV-2 10 · SOV-3 10 · SOV-4 15 · SOV-5 20 · SOV-6 15 · SOV-7 10 · SOV-8 5 (%)	[S] framework §5
R5	Consistency rule	a place below the minimum on any one objective is excluded for that class	[S] framework §1

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#	Requirement	Value	Source
R6	Residency	0 copies of personal data outside the EU; 0 copies of restricted data outside the client's two buildings	[T]
R7	Placement score	100 % of workloads scored before build: 3-year cost, latency, residency and SEAL fit, exit effort, 25 % each	[T]
R8	Restricted-class autonomy	restricted workloads run and are administered with no connection to any public cloud	[T]
R9	Local control plane	portal, Resource Manager, RBAC, Policy and Key Vault available disconnected	[S] Azure Local disconnected operations
R10	Sovereign region candidate	EU-resident operation, separate from the provider's other regions	[S] AWS European Sovereign Cloud
R11	Evidence	per place: signed SEAL sheet, the evidence behind each level, date, signatories	[T]
R12	Review	re-assessment every 12 months and on any change of owner, operator or jurisdiction	[A]
R13	Exit	each placement's exit route and switching timetable recorded	[T]; [S] Data Act applies since September 12, 2025

Thirteen rows; six carry a published figure, three are design assumptions, four are design targets.

3 · Architecture overview

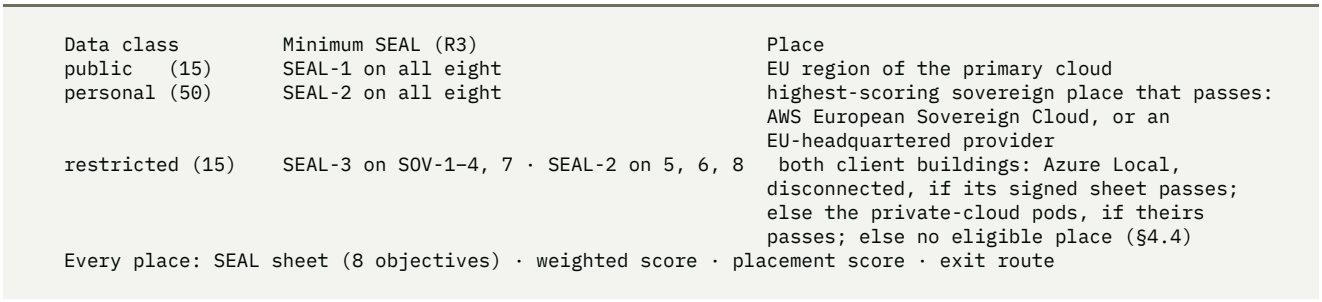


Figure 1. Placement by data class and SEAL level

Three classes, three places, one method. The framework decides whether a place is eligible for a class; the placement score decides between eligible places; the evidence file shows the auditors both steps.

Table 4. Architecture overview

Role	Product (exact model)	Qty	Capacity used	Why this unit
Assessment method	EU Cloud Sovereignty Framework v1.2.1	1	8 objectives per candidate [T]	the Commission's own procurement method [S]

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Role	Product (exact model)	Qty	Capacity used	Why this unit
Sovereign region candidate	AWS European Sovereign Cloud (Brandenburg)	1 region	50 personal-class workloads if it passes [T]	EU-resident operation, separate region [S]
EU provider candidate	a provider awarded under the Commission's Cloud III tender	1	same 50 workloads if it scores higher [T]	assessed by the Commission at SEAL-2 or above [S]
Restricted platform (candidate)	Azure Local 12.2609.1003.7 with disconnected operations	2 instances, one per building	15 workloads as VMs [A]	local portal, ARM, RBAC, Policy, Key Vault [S]; eligible only if its signed sheet passes R3 [T]
Management	dedicated management cluster for disconnected operations	1 per instance	local control plane [S]	required for disconnected operation [S]

4 · Design by subsystem

4.1 Classification.

Each ministry classes its workloads with its data-protection officer; the class sets the minimum SEAL (R3) [A]. Rejected: one level for all — SEAL-3 everywhere moves the 15 public-information services to the most constrained places for no gain; SEAL-1 everywhere fails the personal and restricted classes.

4.2 The assessment.

For each candidate place: the provider's answers, supporting evidence and public documentation give a SEAL level per objective [S]. "Material weaknesses identified in one or more contributing factor will result in lowering the overall assurance level" [S]. The sovereignty score is the sum over SOV-1 to SOV-8 of the achieved share of points times the weight in R4 [S]. The client's CISO and legal counsel sign each sheet [A]. The Commission ran the same method in April 2026 with SEAL-2 as the eligibility floor; most of its four awarded providers reached SEAL-3 [S].

4.3 Personal class, 50 workloads.

Two candidate families. AWS European Sovereign Cloud, launched January 15, 2026 in Brandenburg, "operated exclusively by EU residents" and "physically and logically separate from other AWS Regions" [S]. EU-headquartered providers of the kind the Commission awarded [S]. Whichever passes SEAL-2 on all eight objectives takes part; if both pass, the placement score decides (R7) [T]. This document assigns no SEAL level to any named provider; that is the client's signed assessment (R11). Rejected: a standard EU region with customer-managed keys — it controls the data, not who operates the service, and does not answer SOV-4.

4.4 Restricted class, 15 workloads.

Azure Local with disconnected operations runs VMs from a local control plane: portal, Resource Manager, RBAC, managed identity, Key Vault, Policy and Container Registry, with no connection to Azure [S]. AKS enabled by Arc is in Preview there [S], so restricted workloads run as VMs. Eligibility: an eligible agreement (not MOSA), Standard support or higher, Premier Solutions hardware and a dedicated management cluster [S]. The September 2026 release is 12.2609.1003.7 [S]; rack-aware clustering is generally available and spreads each instance across two racks in its building **[S][A]**.

Whether Azure Local reaches SEAL-3 on SOV-1 to SOV-4 is not assumed. The framework defines SEAL-3 as "EU actors exercising meaningful but not full influence" with service, technology or operations "under marginal control of non-EU

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third parties" [S] (read Sep 27, 2026). Disconnected, in the client's buildings and run by the client's staff, the platform is a strong answer on SOV-3 (data) [A]; on SOV-1 (strategic), SOV-2 (legal and jurisdictional) and SOV-4 (operational) the software is still developed, licensed, supported and patched by a non-EU company, and SOV-4's own factors include support delivered from within the EU and access to source code and documentation [S]. Those levels therefore come only from the signed sheet (R11), like every other place. If the sheet shows SEAL-2 on any of SOV-1 to SOV-4, Azure Local is excluded (R5). The fallback is the private-cloud pods in the same two buildings, and they face the same signed assessment on SOV-1 to SOV-4: their virtualization software also comes from a non-EU company (SRA-DC-001) [A]. The one public comparison points the same way: in the Commission's April 2026 award, the offering built on a non-EU provider's cloud technology and operated by EU companies reached SEAL-2, while the providers developing their own technology reached SEAL-3 [S] (European Commission, April 17, 2026, read Sep 27, 2026). If the pods pass, the restricted class runs there [T], at the cost of rewriting the ministries' Azure templates for those 15 workloads [A]. If neither sheet passes, no place in scope is eligible: the client either assesses a platform whose technology is under EU control or lowers the minimum in writing, and the restricted workloads stay where they run today until then [A].

The minimums for this class accept SEAL-2 on SOV-5, 6 and 8 (R3) [A]. Supply chain and technology: SEAL-3 needs non-EU control to be marginal [S], and no candidate in scope, the private-cloud pods included, has its servers, processors and firmware under EU control [A]; SEAL-4 allows "no critical non-EU dependencies" [S]. Environmental sustainability: it carries 5 % of the score [S], and its factors (energy efficiency, end-of-life treatment of hardware) bear on the buildings and their operator, not on who can reach restricted data [A]. A buyer that sets SEAL-3 on SOV-5 or SOV-6 finds no eligible place in this design (§6).

4.5 Public class, 15 workloads.

The primary cloud's EU region under its standard landing zone [A]. Residency (R6) is held by the region allow-list guardrail, as in CLD-002 §4.2.

4.6 Evidence, review and exit.

One file per place: SEAL sheet, evidence, date, signatories (R11). Re-assessment every 12 months, and at once on any change of owner, operator or jurisdiction [A]. Each workload's record names its exit route; the Data Act has applied since September 12, 2025 and removes switching charges, egress included, from January 12, 2027 [S] (R13).

5 · Failure behavior

Table 5. Failure behavior

Failure	Behavior	Source
A place falls below its class minimum at re-assessment	no new placements; that class's workloads leave by their recorded exit routes	[A] R12; [T] R13
Link from a client building to every public cloud cut	restricted workloads keep running and are administered locally	[S] disconnected operations; [T] R8
One Azure Local node down	VMs restart on the remaining nodes of the instance	[A] N+1 sizing
One rack down in a building	the rack-aware instance keeps running on the other rack	[S] rack-aware clustering GA; [A] sizing
A workload reclassified upward	re-placed within 90 days; meanwhile no new data admitted	[A]
A provider announces a change of control	re-assessment starts within 30 days	[A]

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6 · Limits

- No SEAL level for any named provider is stated here; levels come only from the client's signed assessment.
- Disconnected operations must be applied for; Microsoft answers within 10 business days [S], and the build plan starts from approval, not from signature.
- AKS on disconnected operations is in Preview [S]; restricted container workloads wait for GA.
- The per-objective minimums of the restricted class are a design choice; another buyer may set them higher and find no eligible place. SEAL-3 on SOV-5 or SOV-6 has no eligible place in this design.
- Azure Local's levels on SOV-1 to SOV-4 are not stated or assumed here; if its signed sheet falls below SEAL-3 on any of them, the private-cloud pods take the restricted class only if their own signed sheet reaches SEAL-3 on SOV-1 to SOV-4 (§4.4). Both run software from non-EU companies, and the Commission's one comparable award reached SEAL-2 [S], so an outcome with no eligible place is possible and is the client's decision to resolve.
- The framework is version 1.2.1 of October 2025 [S]; a new version re-opens every assessment.

7 · Lessons learned

None yet — this is a design study; populated after the first build against it.

8 · The author

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SYMBEEO

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Figures are as published by their sources on the dates given in this document; figures marked [A] are assumptions.

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