

Application Question 220 Applicant Self-Certification
3 August 2026

I, Alvaro Alvarez, the Manager of Empty Hand, LLC's Sole Member do hereby certify, represent, and warrant as follows:

Empty Hand, LLC will appropriately protect confidentiality of data and prevent unauthorized access to data and services.

Empty Hand, LLC will maintain a mature, appropriately funded and staffed security Program, following a recognized, modern security framework based on risk management (such as the ISO27000 series, COBIT, HITRUST CSF, legally required security frameworks, or equivalent). The security Program must be in place prior to delegation, and exist through at least the period of the Base RA.

Empty Hand, LLC is aware of and has designed its systems and business to comply with the relevant privacy and security regulations for all countries in which it operates.



Alvaro Alvarez
Manager of Its Sole Member
Empty Hand, LLC