READINESS REPORT ISSUE 5 MAY 2026

Digital Sovereignty Decoded

A Practical Framework for Strategy, Solutions, and Smart Tradeoffs

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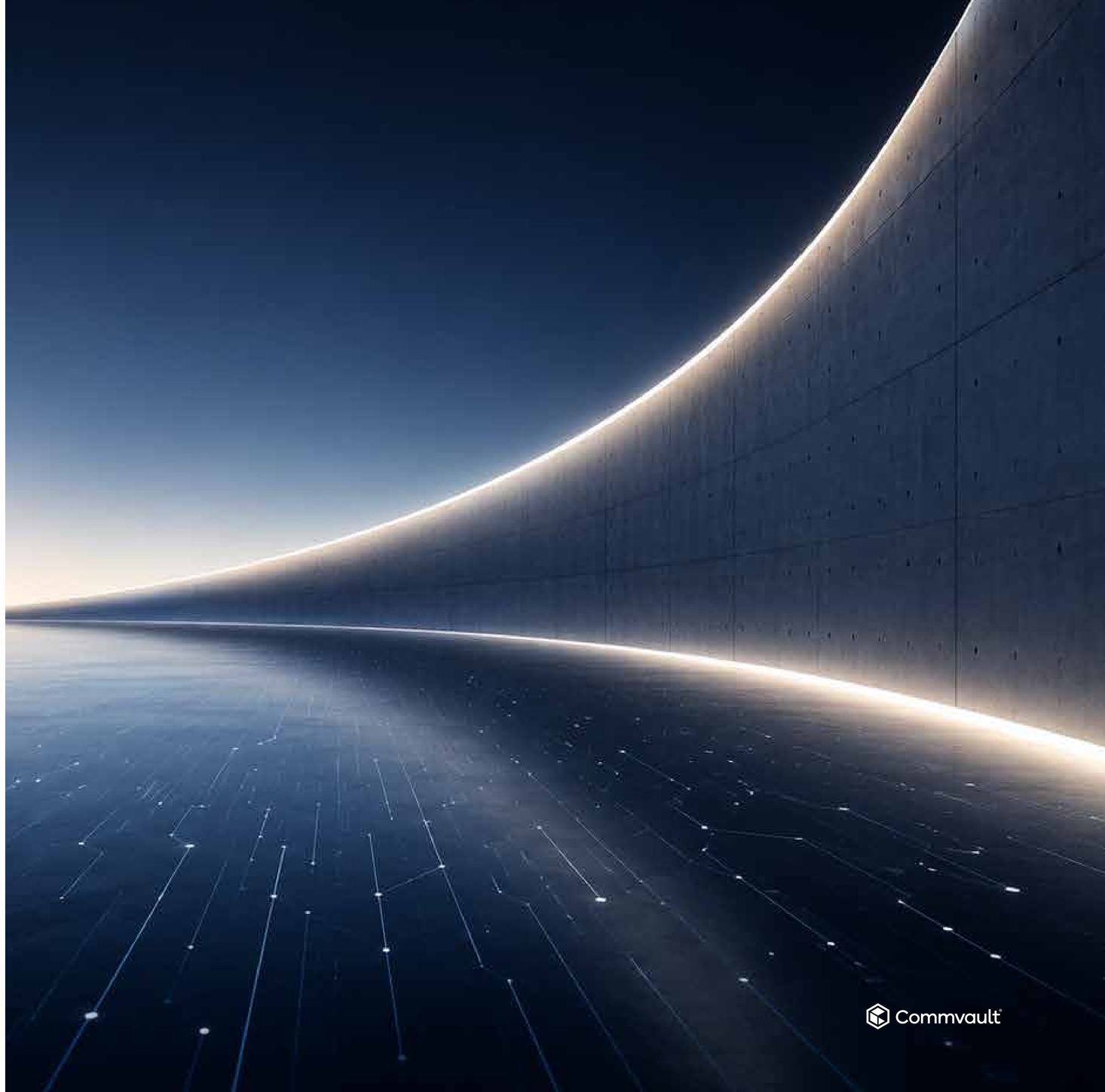


Executive Summary

The audit request arrives before the strategy does. A regulator asks your team to demonstrate that a specific dataset never left a defined geography, that no foreign-jurisdiction personnel accessed it, and that you can recover it within 24 hours under incident conditions.

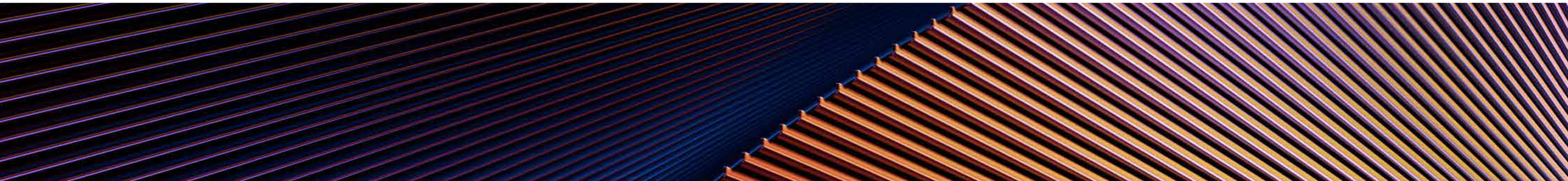
Most organizations, at that moment, discover that digital sovereignty deployment and a defensible sovereignty posture are not the same thing.

Most organizations find this gap not by design but under pressure. Not because they haven't invested, but because they've been answering the wrong question. The dominant response to sovereignty pressure – picking a sovereign cloud region, moving workloads on-premises – addresses where data lives. That is a starting condition, not a strategy.

The organizations that satisfy an auditor, survive a crisis, and maintain customer trust understand sovereignty as a multi-dimensional discipline involving who controls the data, who operates the environment, who holds the encryption keys, and what happens when recovery becomes necessary under legal constraint.

This report introduces a practical four-pillar framework for assessing that readiness, identifies where sovereign strategies most commonly break down, and gives CIOs and CISOs four direct questions to evaluate their current posture.

Sovereignty is not a binary state. It is a sliding scale of deliberate decisions. The organizations that get it right define their requirements before the auditor does.



Why This Moment Is Different

For most of the past decade, digital sovereignty was a concern reserved for government agencies and defense contractors. We are living in a different era now.

Regulatory frameworks are arriving faster than procurement cycles. The EU's GDPR enforcement has matured beyond mere guidance into substantial fines for operational failures. DORA and NIS2 impose binding requirements on operational resilience and incident reporting, both of which now carry sovereignty implications.

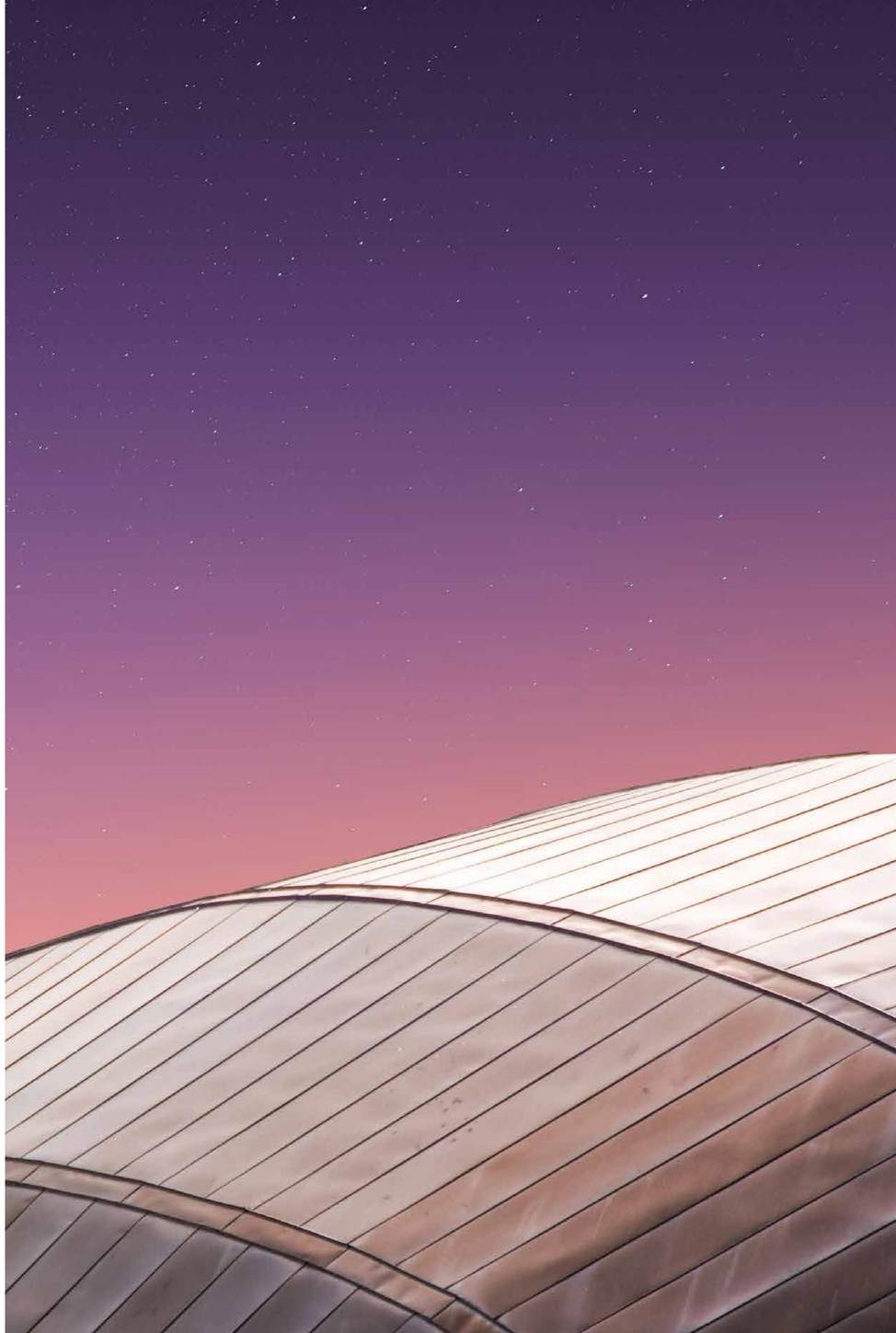
Germany's KRITIS framework, the EU Data Act, and a growing body of equivalent regulation across Asia-Pacific and the Middle East are establishing the same pattern: Regulators expect demonstrated control, not documented intent.

The extraterritorial access problem has sharpened in parallel. A foreign technology provider – whether a U.S. hyperscaler, a Chinese hardware vendor, or a telco with non-EU ownership – operating infrastructure in-country does not automatically remove the reach of their home jurisdiction's law over that provider's operations.

Organizations relying on infrastructure, software, or support personnel subject to foreign jurisdiction carry legal exposure that region selection alone cannot resolve – a distinction regulators and procurement committees understand with increasing precision.

Sovereignty is now showing up in RFPs, investor diligence questionnaires, and board risk discussions, not just compliance audits. European sovereign cloud infrastructure spending is forecast to more than triple between 2025 and 2027, reaching over $23 billion – driven by geopolitical pressures and tightening regulatory requirements.[1]

This is a structural shift in how regulated enterprises will be expected to operate. It requires a structural response, not a regional deployment decision.



[1] Gartner

The Core Misunderstanding: Sovereignty Is Not Data Residency

Here is the question most sovereignty strategies never actually answer: If your data lives in the right country, can you prove who can access it, under what legal authority, through which operational pathways – and whether you can recover it cleanly if something goes wrong?

Data residency answers the question of where. Sovereignty answers who, how, and under what conditions. Treating them as equivalent is the most common – and most consequential – mistake when creating a digital sovereignty strategy.

Think of it this way: Choosing a sovereign cloud region is like buying a safe. It tells you where the valuables are stored. It says nothing about who has a copy of the combination, who manufactured the safe, which country's laws govern the manufacturer, or whether you can actually open it under pressure.

Region selection answers one question. The questions that follow – who operates the environment and from where, whose legal regime governs access to the data, how encryption keys are controlled and by whom, whether recovery is possible within defined tolerances – remain entirely open.

Most sovereignty strategies stop at where data lives and ignore who, how, and under what conditions the data can be accessed.

There is also no single definition of “digital sovereignty.” The term covers meaningfully different delivery models, with different implications depending on an organization’s risk profile and regulatory obligations.

Deployment Model	What It Provides	What It Leaves Open
Public hyperscaler region	Data in-country; familiar APIs and scale	Operational control, jurisdiction, key custody
Hyperscaler sovereign partition	Enhanced controls within provider’s platform	Cross-platform governance, operational sovereignty
National sovereign cloud environment	In-country operations, citizen operators	Service breadth, recovery complexity, cross-environment governance
On-premises/private sovereign cloud	Full operational control, optional air gap	Governance at scale, recovery orchestration, cost

Understanding which model fits your regulatory obligations and risk posture, before committing to an architecture, is the first act of sovereign leadership.

The gap between where most sovereignty programs start and where they must end is exactly where programs fail, and why most organizations benefit from a **minimum viable sovereignty** approach. This approach deliberately distributes workloads across deployment models to optimize control, compliance, and cost, rather than treating sovereignty as all or nothing.

The Four Pillars

A complete sovereignty framework spans four interdependent pillars, unified by an overarching layer of compliance and certifications. No single pillar is sufficient. A strong data locality posture with weak operational controls is not sovereignty. It is residency with unexamined risk.

PILLAR 1: DATA LOCALITY

Data locality covers not just where data is stored, but where it travels, including control-plane artifacts, metadata, and telemetry that may cross geographic boundaries even when primary data stays in-region.

Most organizations have reasonable visibility into their primary data stores. Far fewer have mapped where metadata goes, how control-plane traffic is routed, or whether supporting systems – monitoring platforms, IT service management tools, security information and event management environments, and other infrastructure that handles metadata – introduce out-of-region dependencies.

What good looks like:
A complete data map covering primary data, metadata, and control-plane artifacts across every environment, with documented controls for each.

Where organizations fall short:
Assuming that choosing an in-region storage tier resolves the locality question for the full estate. It rarely does.

PILLAR 2: TECHNOLOGICAL SOVEREIGNTY

Technological sovereignty is about control over the mechanisms that protect data. It addresses how access is granted, how data is encrypted, and whether the organization retains custody of the keys under all conditions, including crisis conditions and legal compulsion.

Key management is one critical dimension; the distinction between Bring Your Own Key (BYOK) and Hold Your Own Key (HYOK) is not semantic. Technological sovereignty also encompasses architecture portability, supply chain visibility, and the ability to adapt the technology stack as regulatory requirements evolve.

PILLAR 3: OPERATIONAL SOVEREIGNTY

Operational sovereignty is the hardest pillar to audit and the most likely to be underestimated. It covers who operates the environment and from where, including whether support personnel are subject to foreign jurisdiction, whether third-party vendors can access systems across sovereignty boundaries, and whether telemetry or billing data exits the defined boundary.

To determine operational sovereignty, the question to ask is a simple one: **If your environment needed access for routine maintenance tonight, who would perform it, from which country, and under which legal jurisdiction?** Most organizations, when they audit this for the first time, find at least one support pathway that crosses a jurisdiction boundary they hadn't mapped.

PILLAR 4: JURISDICTIONAL SOVEREIGNTY

Jurisdictional sovereignty establishes the legal and regulatory context under which services are delivered, including the governing law, and explicit protections against extraterritorial access, including the risks raised by the U.S. CLOUD Act in cross-border data situations.

Certifications

C5 in Germany, SecNumCloud in France, and ISO 27001 provide auditable evidence that sovereignty requirements are consistently enforced. But certifications describe intent. They do not substitute for operational controls. The strongest sovereignty postures treat certifications as the floor, not the ceiling.

Sovereignty Without Resilience Is Incomplete

Picture the moment: The attack already has happened. The incident response team is assembling. Someone must decide which systems come back first, in what order, using the correct recovery points.

And then someone realizes: The incident response team – the people authorized to make recovery decisions, validate clean recovery points, and execute the restoration sequence – includes personnel based outside the jurisdiction.

Both the primary and secondary data environments fall under in-region sovereignty requirements. But the human layer of the response does not. The backup infrastructure wasn't subject to the same sovereignty controls as primary data. The regulator is asking for status. The clock is running.

This is a scenario most sovereign architectures were not designed for. Sovereignty programs are typically built around access control – who can reach the data, under what authority, through which pathway. That is necessary. But it leaves the harder question unanswered: What happens after an incident when the people authorized to execute recovery don't meet the same jurisdictional requirements as the data they're restoring?

A ransomware attack on a regulated European organization doesn't simply create a recovery problem. It creates a recovery problem that must be solved within the jurisdiction, using personnel with appropriate authorizations, against recovery points that can be demonstrated to be clean and uncompromised.

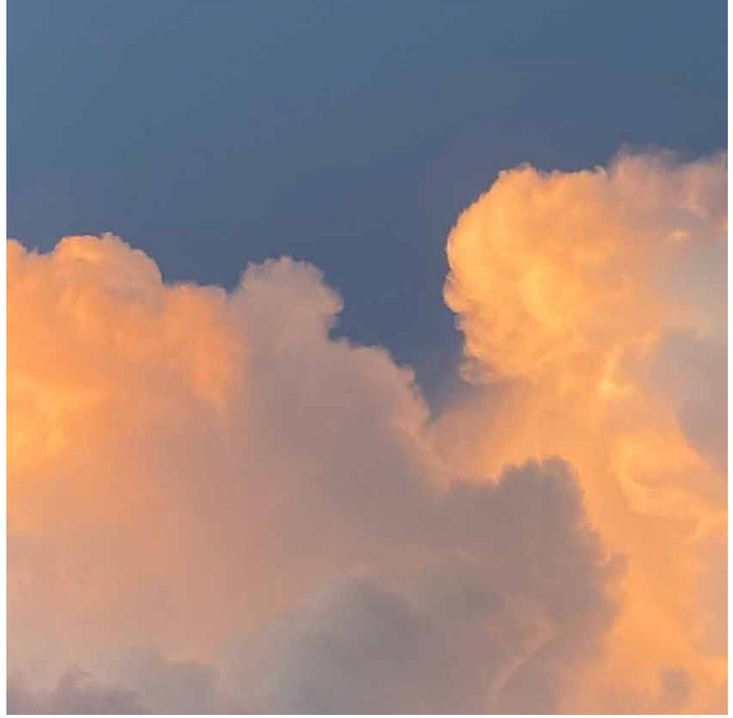
The sovereign architecture designed to protect the data can make recovery harder if resilience wasn't built into the original design.

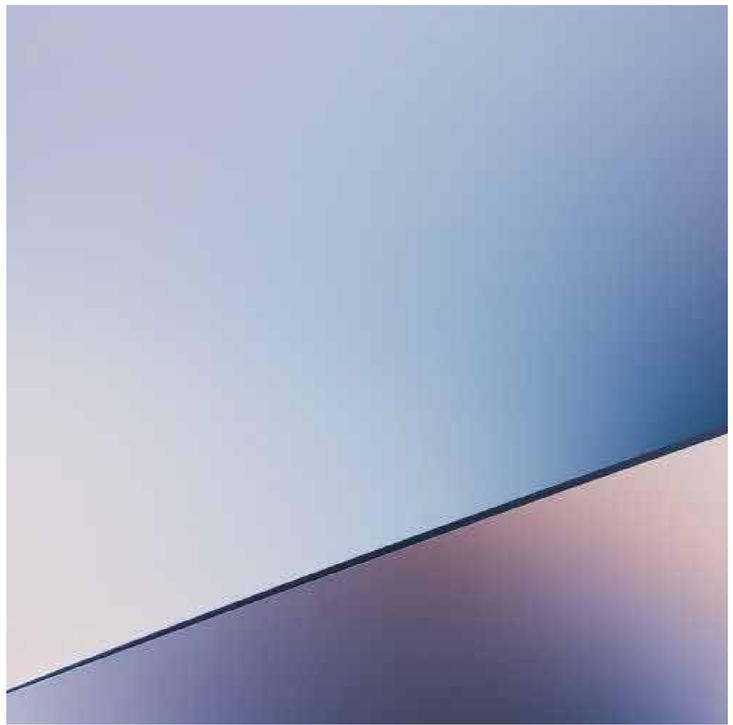
Most sovereign applications are designed for the audit, not the incident.

Digital sovereignty spans the full lifecycle of data – from procurement decisions and vendor contracts through operational controls and incident response. That cross-functional scope is where most frameworks fall short. Governance gets applied to primary environments. Recovery architecture – backup infrastructure, restoration sequencing, recovery point tolerances – is addressed separately, if at all, and often without the same sovereignty controls.

That gap is invisible until the incident arrives.

A sovereignty review should include recovery, not defer it. The question is direct: Does your recovery architecture meet the same sovereignty requirements as your primary data environment? For most organizations, the honest answer reveals it does not.





Four Questions to Assess Your Readiness

Sovereignty readiness is not a binary condition. It is a posture – and posture can be evaluated, improved, and demonstrated. These four questions are designed to surface where your current strategy holds and where it doesn't.

1. Have you defined sovereignty requirements by workload, not just by environment?

A sovereign cloud deployment is not the same as a sovereign workload strategy. A payroll system, a customer transaction database, and an internal HR tool carry different risk profiles, different regulatory obligations, and different sensitivity to extraterritorial access. Before deciding where to run workloads, define what each workload actually requires across all four pillars.

2. Can you demonstrate your posture with evidence, not just describe it with documentation?

Regulators are asking for proof of control. Not policy documents, but evidence that operational and technological controls are consistently enforced and tested. If your sovereignty posture lives primarily in documentation, the gap between policy intent and operational reality is exactly where audit risk concentrates.

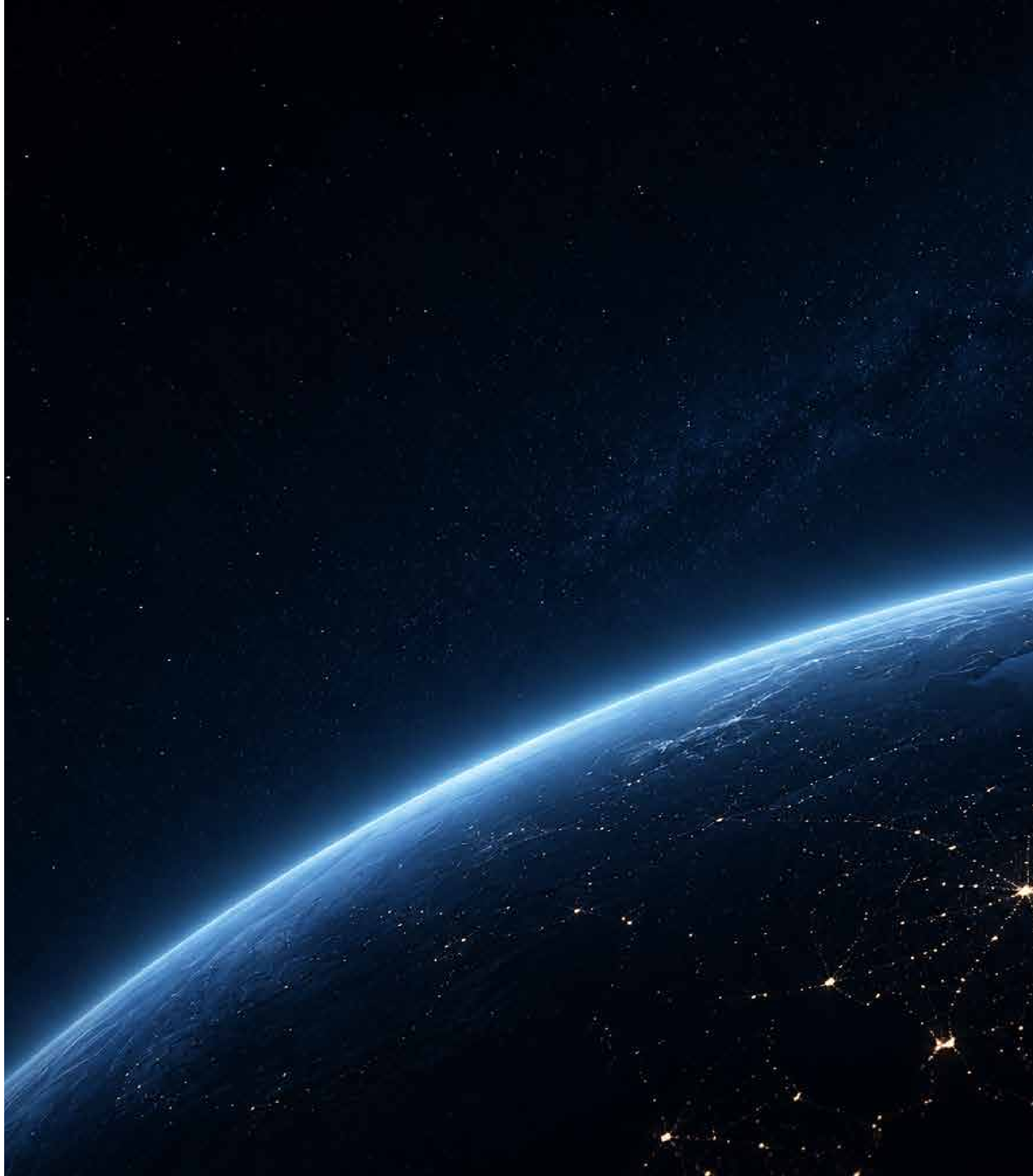
3. Does your sovereignty model account for recovery, or does it stop at storage?

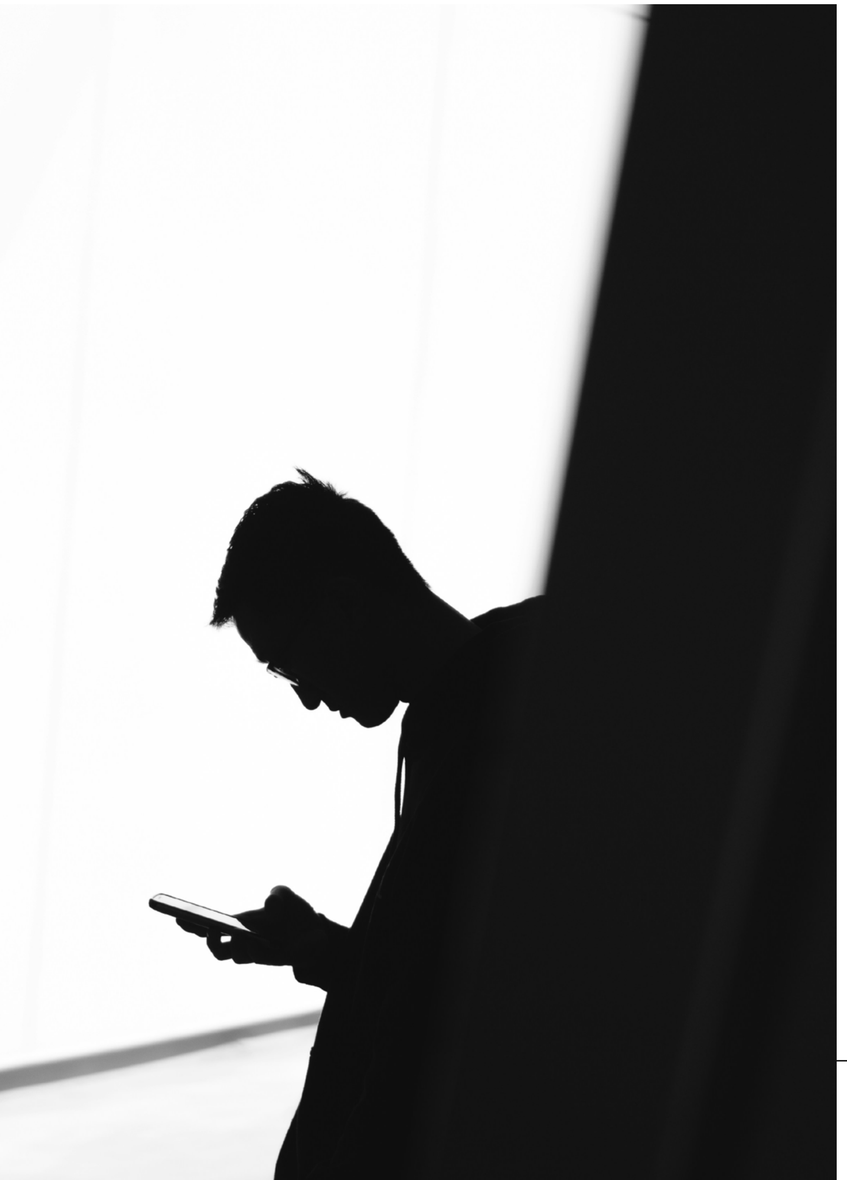
Most sovereignty programs protect data at rest and in transit. Far fewer account for recovery: whether critical services can be restored within defined tolerances, from clean recovery points, by authorized personnel, within the sovereignty boundary.

If your recovery architecture is separate from your sovereignty architecture, you have an unexamined risk – one that may surface at the worst possible moment.

4. Are your operational dependencies inside or outside your sovereignty boundary?

Audit your support contracts, vendor access agreements, and third-party dependencies. Identify every access pathway into your sovereign environment and the legal jurisdiction of everyone with that access. The sovereignty of your infrastructure is only as strong as the weakest link in your operational chain.





Conclusion

The goal is not maximum sovereignty. It is appropriate sovereignty or, in practical terms, **minimum viable sovereignty:** the right levels of control, consistently enforced, continuously demonstrated, and calibrated to what your organization owes regulators, customers, and the board.

Maximum sovereignty comes with the real tradeoffs of technological complexity, operational burden, service limitations, and cost. Organizations that treat sovereignty as binary – either sovereign or not – tend to either under-invest in controls that matter or over-invest in architecture that exceeds their actual obligations.

The organizations that get it right define their requirements first, map those requirements to the four pillars and the umbrella of compliance and certifications, and make deployment decisions with clear understanding of what each model provides and what it leaves open.

The regulators writing today's frameworks are already drafting the next ones. The audit your compliance team will eventually face, and the incident your recovery architecture will eventually confront, will ask the same question: Can you prove control over your data, your operations, and your recovery – right now, under real conditions?

The organizations building that capability now will have the evidence when it's required. The ones that don't will be building it under pressure, in front of the people they least want to disappoint.

Assess your sovereignty posture with our companion framework and maturity reference, and access additional resources at readiverse.com/digital-sovereignty.