TNP

DIGITAL SOVEREIGNTY

Technology Dependency Risk Framework

20 January 2026

WORLDWIDE DIGITAL REGULATIONS ARE CONFLICTING, ONLY ONE REALLY COUNTS: THE SUPPLIER, NOT THE USER

OFFENSIVE EXTRA-TERRITORIAL REGULATIONS ▶
on US vendors for free market access and national security compliance

FISA 702
AI Act
Cloud Act

DEFENSIVE EU REGULATIONS
for fair market access and users protection on technology usages

AI Act
DMA
DSA
DORA
EUCS
GDPR
NIS 2.0

THE IMPOSSIBLE REGULATORY RECONCILIATION?

Microsoft

Cloud Act	GDPR
Applies to U.S. technology vendors overseas	Applies on personal data of European Union users
5B+ users	500M users

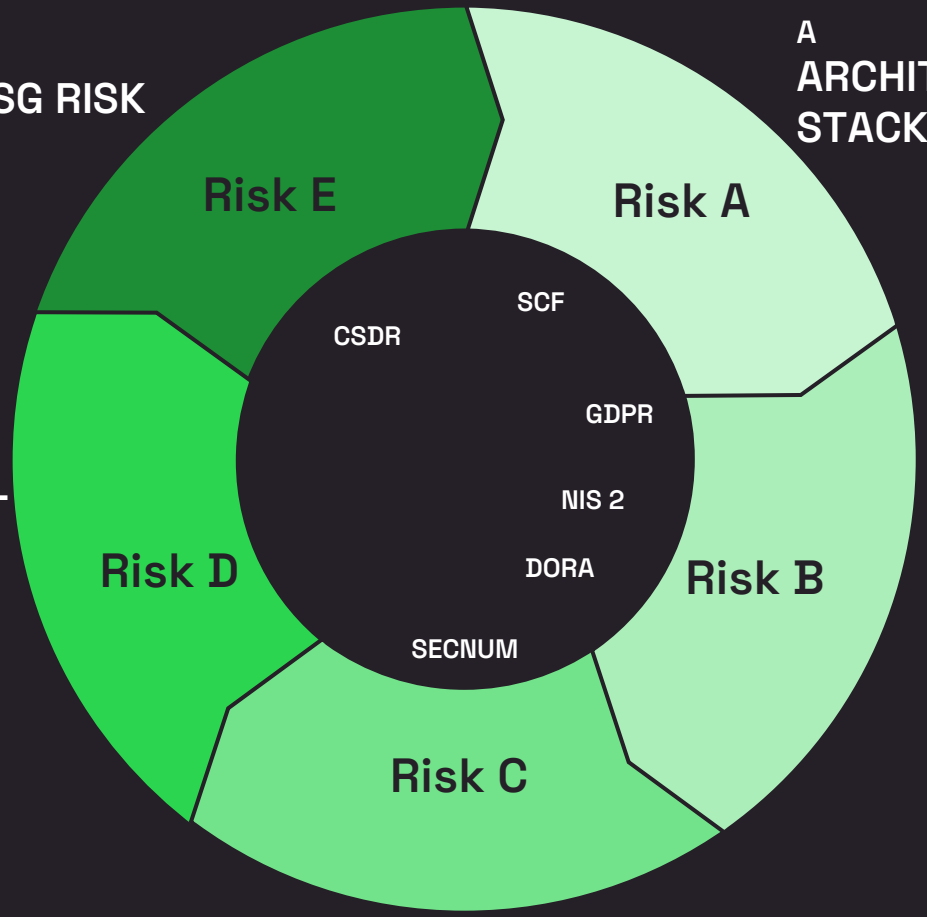
EUROPE SPENDS €264B ON U.S. CLOUD AND SOFTWARE (82% DEPENDENCY) ON A TOTAL OF €482B OF US IMPORTS IN IT SPENDING, REPRESENTING A MISSED OPPORTUNITY OF 5 MILLIONS JOBS OUTSIDE EUROPEAN BORDERS

	IT SPENDING 2025			IT SPEND DEPENDENCY	
IT SPEND CATEGORIES	WORLDWIDE (BILLION $)	EUROPE (BILLION $)	EUROPE (BILLION €)	US IMPORTS	NON US
IT SERVICES & COMMUNICATIONS	1 686	768,4	660.8	28%	72%
END USER DEVICES	780	143.7	123.6		
ENTERPRISE SOFTWARE	1 232	290	249,4	82%	18%
DATA CENTERS & CLOUD	475	83.6	71,9		
ANNUAL REVENUES	4 173	1 285.7	1 105,7	482	623,7
ANNUAL JOBS US (DIRECT + INDIRECT, Asteres MIA model)				5 000 000	
ANNUAL PIB US				1,6%	

Sources : Eurostat, Gartner, Asteres report 2025
TNP Analysis

MEASURING TECHNOLOGY DEPENDENCY RISK IS THE STARTING POINT FOR BUILDING RESILIENCE

THE TECHNOLOGY DEPENDENCY RISK FRAMEWORK (12 CRITERIA) HAS BEEN DEFINED BY TNP TO MEASURE THE IMPACT OF ICT "VENDOR DOMINANCE" ON CRITICAL COMPONENTS OF THE VALUE CHAIN (BUSINESS RESILIENCE)



A ARCHITECTURE STACK RISK

1. Interoperability risk (API)
2. Portability risk (Infrastructures, software, AI models)

IRN

- Layer Infrastructure & Networks
- Layer Business Software
- Layer Data & AI Systems
- Layer End User Services

B OPERATIONAL RISK

1. Operational discontinuity Risk (incl. Cyber)
2. Data Exposure & Leakage Risk
3. Loss of Intellectual Property
4. Loss of Internal Competences

C REGULATORY RISK

1. Extra-European Jurisdiction Risk (Cloud Act; FISA 702,..)
2. Non-National Compliance Risk

D FINANCIAL RISK

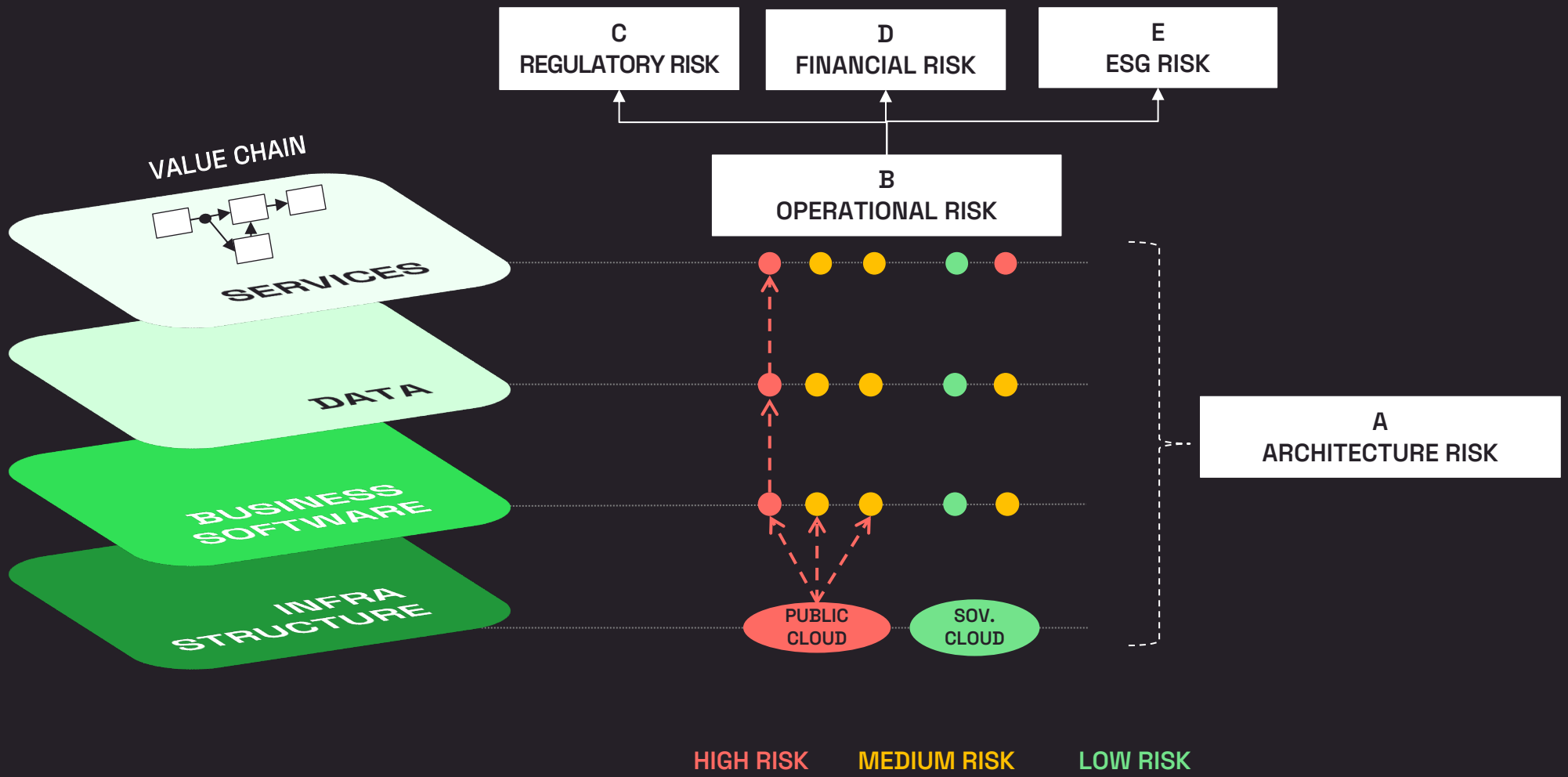
1. Loss of revenues, penalties
2. Economic Dependency Risk

E ESG RISK

1. Ethical & Trust Risk
2. Sustainability Risk

DEPENDENCY RISK PROPAGATES FROM ARCHITECTURAL CHOICES TO BUSINESS EXPOSURE

IT Architecture choices have lasting implications on operational, financial and ESG risks, rising regulation defaults (and exposure to penalties)

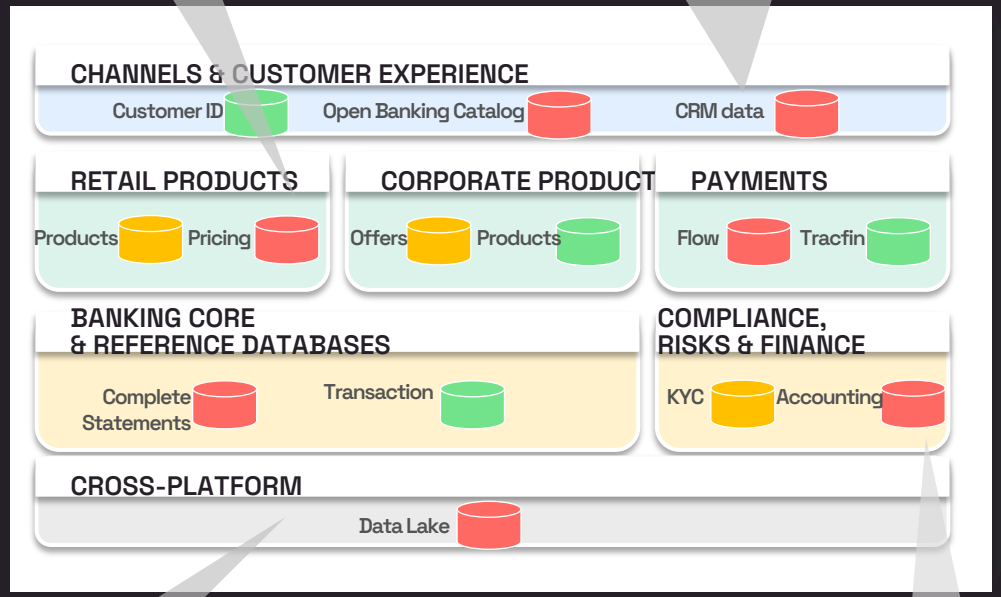


THE VALUE CHAIN DEPENDENCY MAP

IT LANDSCAPE DISCONTINUITY EXPOSURE

Don't answer to demands of support

The prohibition of use can be obtained through legal proceedings based on contractual clauses



Lock system and stop operations

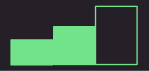
The Technology can be disconnected remotely

VALUE CHAIN DISCONTINUITY IMPACT

EXEMPLE "ORDER INTAKE"	A ARCHITECTURE RISK	B OPERATIONAL RISK	C REGULATORY RISK	D FINANCIAL RISK	E ESG RISK	TOTAL IMPACT Earning loss (in m€)
Comp. A (Sale Order, ERP)	☹	😐	😐	😐	🙂	😐
Compo B (Pricing, US package)	☹	☹	☹	😐	😐	☹☹
Comp C (Contract issual, ERP)	☹	😐	😐	😐	🙂	☹
Comp D (Legal archiving	😐	🙂	☹	🙂	🙂	🙂

🙂 LOW 😐 MEDIUM ☹ HIGH ☹☹ VERY HIGH

LEVERS OF SOVEREIGNTY ARE KNOWN BUT HAVE A COST : A BOARD ISSUE TO SCALE AI TRUST ACROSS THE ORGANISATION AND WITH CUSTOMERS

LEVERS	RISK COVERAGE A Arch	B Oper	C Reg	D Fin	F ESG	IMPROVEMENT ON RESILIENCE	COMMENTS
SKILL INTERNALIZATION	●	●	○	●	●		Full ownership of critical applications
SOVEREIGN CLOUDS (SECNUMCLOUD)	●	●	●	◑	●		Depending on XaaS stack coverage
ARCHITECTURE INTEROPERABILITY (API)	●	●	◑	●	◑		Interoperability standards enforced (API Catalog applied on +80% of applications)
VENDOR JURISDICTION (EUROPE)	○	●	●	○	●		Provides protection against FISA 702 and the CLOUD Act, but may hinder innovation capacity (e.g., AI models)
VENDOR SOFTWARE PORTABILITY	●	◑	●	◑	◑		Migration is subject to business readiness and IT budget constraints
FREE SOFTWARE / OPEN SOURCE	●	●	◑	●	◑		Requires intensive IT staff and third-party support (man-days vs. licenses), with associated intellectual property risks
DATA PROTECTION	●	●	●	◑	●		Requires strong encryption expertise, privacy-by-design architecture capabilities, and segregation of duties (SoD) across the organization
DATA GOVERNANCE	◑	●	●	◑	●		Requires clearing data quality debt and operating distributed data storage and recovery plans.
CYBERSECURITY	●	●	●	◑	◑		Running DORA or NIS resilience tests at a regular pace
TECH CARBON FOOTPRINT	◑	◑	●	◑	●		Small impact, brand recognition, and future carbon reporting regulations compliance

● FULLY COVERED ◑ PARTIALLY COVERED ○ NON-COVERED

TNP

HARNESS THE UNPREDICTABLE

OUR EXPERTS

Thierry Cartalas
Senior Partner & Managing Director
TNP Digital

Emmanuel Houzelle
Associate Partner
TNP Digital

Sylvain Collado
Partner
TNP Trust