

# atoro.io

## CYBER COMPLIANCE

Kimura Limited t/a Atoro. Company Reg: 621479, 25 The Drive, Graigavern Lodge, Ballybrittas, Co. Laois, R32P6P5, Ireland.

Date: March 18th 2026

To Whom It May Concern,

This letter serves as an attestation that Binarii Labs Limited, located at 3rd Floor, The Boathouse, Bishop Street, Dublin 8, D08 H01F, Ireland, is committed to complying with the Health Insurance Portability and Accountability Act (HIPAA) with respect to the processing of protected health information. Atoro consultants have been engaged to assess Binarii Labs Limited's HIPAA compliance level and provide recommendations. Based on our assessment services, we attest that Binarii Labs has implemented the following supporting measures:

- Risk Assessments: Conducted comprehensive risk analyses to identify and evaluate risks to Protected Health Information (PHI) and Electronic Protected Health Information (ePHI), implemented appropriate administrative, physical, and technical safeguards, and ensured compliance with HIPAA Security Rule requirements.
- Appointment of Security and Privacy Officers: Appointed a qualified Security Officer to oversee security governance and HIPAA compliance program implementation, and a Privacy Officer to manage privacy policies, procedures, and ensure compliance with HIPAA Privacy Rule requirements.
- Establishing Policies and Procedures: Developed and implemented comprehensive HIPAA policies, procedures, and governance controls to support compliant handling of health data across the organization.
- HIPAA-Focused Training: Implemented HIPAA training programs to educate personnel on regulatory requirements and assigned responsibilities related to Protected Health Information (PHI) and Electronic Protected Health Information (ePHI).
- HIPAA Business Associate Agreement (BAA): Based on the organization's data mapping findings and our independent assessment, Binarii Labs Limited does not currently engage in activities involving Protected Health Information (PHI) or Electronic Protected Health

Information (ePHI) as defined under HIPAA. Consequently, Business Associate Agreement obligations do not apply to the organization's present operational framework.

- Security Measures and Technical/Organizational Measures (TOMs): Implemented and validated security measures and Technical and Organizational Measures to support compliant handling of data subject requests and security incidents in accordance with HIPAA requirements.

During our engagement, we have observed and contributed to Binarii Labs's commitment to best-in-class security and privacy. Atoro is committed to continuing our work with Binarii Labs to refine and enhance their HIPAA program. We are confident in their ongoing dedication to HIPAA compliance and are pleased to be a part of their journey towards maintaining high standards in data protection and privacy.

Based on the measures implemented, I hereby attest that Binarii Labs' is in compliance with its obligations under HIPAA as of March 18th 2026. This statement is made based on the information available to us as described.

HIPAA compliance is a dynamic and ongoing process that requires continuous monitoring and adaptation to evolving business and legal requirements, best practices, and technological advancements. Therefore, Atoro does not provide any warranty or guarantee regarding the future compliance status of Binarii Labs.

If there is any further information needed in relation to Binarii Labs HIPAA Compliance or inquiries regarding this attestation, please feel free to contact me.

Sincerely,



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Tom McNamara (CIPP/E, CIPM)

CEO

Atoro

+353 (01) 575 9340

tom@atoro.io

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