

LUMI Export restrictions and sanctions

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Related documents	LUMI Terms of Use

The content of this document is a mandatory part of the LUMI General Terms of Use.

In these terms “LUMI” means the hosting entity, CSC – IT Center for Science Ltd (representing the LUMI consortium and LUMI partners as applicable).

Export restrictions apply to LUMI Services. For example, LUMI’s supercomputing hardware, the services produced by the hardware is considered so-called dual-use item. Also the results provided by the supercomputing services and expertise derived from them can be dual-use items. Dual-use items are regulated by a mandatory legislation. The users must obey Finnish and EU export restrictions and sanctions.

The services must not be used against US export restrictions or sanctions since these are included as contract terms in contracts with US vendors, other subcontractors and software providers and in that way they bind LUMI and also restrict service use.

The user guide of the LUMI supercomputer can be found from [LUMI Documentation pages](#). LUMI helpdesk will be happy to answer your questions.

When using LUMI Services, creating a LUMI Project, adding members to your LUMI Project or applying resources for a LUMI Project you affirm and confirm the following:

- Your use of LUMI’s Services or the results thereof do not violate export control regulations or sanctions.
- You are not on any sanctions list. The project manager of the LUMI Project must ensure that no project member is on a sanctions list.
- You do not have any commitments that would violate export control or sanctions legislation. You are not affiliated with organizations operating in countries subject to sanctions. You do not use LUMI Services in countries subject to sanctions.



EuroHPC
Joint Undertaking



The acquisition and operation of the EuroHPC supercomputer is funded jointly by the EuroHPC Joint Undertaking, through the European Union’s Connecting Europe Facility and the Horizon 2020 research and innovation programme, as well as the Participating States FI, BE, CH, CZ, DK, EE, IS, NL, NO, PL, SE.

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LUMI

- You do not transfer content, for example software, computing results and research data, or competences to countries under the export restrictions or sanctions.
- You follow the possible export restrictions by the software vendor of the software you are using.
- You do not circumvent the above-mentioned prohibitions by technical means.

If you are uncertain whether export restrictions or sanctions apply to your research project, we recommend to contact the Resource Allocator of your project or LUMI helpdesk.

LUMI is responsible for inspection, monitoring and security processes related to the use of services and export restrictions. Users, Resource Allocators and other gatekeepers are obliged to notify LUMI of any illegal research or other unwanted act that may breach the contract, export or sanctions regulations or other commitments.

If LUMI has reasons to suspect that the services are used partially or entirely against export restrictions or sanctions, LUMI is obliged to report the issue to the export control unit of the Ministry for Foreign Affairs according to the Finnish law on export control 500/2024. If a crime or violation is suspected, CSC is obliged to make a report of an offence to the police. In addition, LUMI may inform the Principal Investigator (PI) of the project and the relevant Resource Allocator about possible violations of these rules.

Information on export regulations and sanctions:

- [Finnish law on dual-use items export control \(Laki kaksikäyttötutotteiden vientivalvonnasta, in Finnish\)](#)
- [Regulation \(EU\) 2021/821 of the European Parliament and of the Council](#) for the control of exports, brokering, technical assistance, transit and transfer of dual-use items (recast), especially the Annex 1
- [Sanctions by countries \(Ministry for Foreign Affairs, in Finnish\)](#), [Export Control \(Ministry for Foreign Affairs, in English\)](#) In particular, sanctions against Russia (Ukraine) are the most important consolidated versions of Council Regulation (EU) 833/2014 and (EU) 269/2014.
- [EU sanctions map on dual-use items](#)
- [Information on US export regulations and sanctions](#)
- [US Resources on Export Controls Implemented in Response to Russia's Invasion of Ukraine](#)
- [US Commerce Control List](#)
- [US Commerce Country Chart](#)



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