

Comparing the previous and new DPA/NDA For Support & Consulting Services

Subject: We've updated our data protection agreements for SuperOffice CRM Online

SuperOffice is committed to protecting and safeguarding your personal data. As part of this commitment, we have updated our Data Processing Agreement to meet the high standards of the new European data protection law, known as the General Data Protection Regulation (GDPR). Effective from October 20, 2020, the updated agreements automatically replace the current versions that your company have.

The 2 new documents affected by changes are:

- **Data Processing Agreement / Non-disclosure agreement for Support & Consulting Services**
- **List of pre-approved Sub-processors for Services**

The main change is:

After the Schrems II EU-court ruling in July 2020, the use of EU-US Privacy Shield to protect data in third countries is no longer valid. We worked with our sub-processors and all our compliant according to standard contractual clauses (SCC). This is now reflected in the agreements as you can see in the below table. In addition we have provided a better description of the processing activities of our sub-processors.

Section	<u>New</u> DPA / NDA for Support & Consulting Services Effective from Oct 20, 2020	<u>Previous</u> DPA / NDA Effective from May 25 2018
3.8 Transfer of Personal Data to Third Countries	<p>If the Processor uses sub-contractors outside the EU/EEA area for Processing of Personal Data, such Processing must be in accordance with EU Privacy Shield Framework EU Standard Contractual Clauses for transfer to third countries, or another specifically stated lawful basis for the transfer of personal data to a third country. For the avoidance of doubt, the same applies if the data is stored in the EU/EEA but may be accessed from locations outside the EU/EEA. Should the Controller approve such transfer of Personal Data, the Processor is obligated to cooperate with the Controller in order to ensure compliant transfers. If the basis for the transfer is the EU Standard contractual clauses (“SCC”) for processors (2010/87/EU), the controller hereby authorizes the Data Processor to enter into Such SCCs with the sub-processor on behalf of the Controller.</p>	<p>If the Processor uses sub-contractors outside the EU/EEA area for Processing of Personal Data, such Processing must be in accordance with the EU Privacy Shield Framework, EU Standard Contractual Clauses for transfer to third countries, or another specifically stated lawful basis for the transfer of personal data to a third country. For the avoidance of doubt, the same applies if the data is stored in the EU/EEA but may be accessed from locations outside the EU/EEA. Should the Controller approve such transfer of Personal Data, the Processor is obligated to cooperate with the Controller in order to ensure compliant transfers.</p>
Section	<u>New</u> List of pre-approved sub-processors for services Effective from Oct 20, 2020	<u>Previous</u> List of pre-approved sub-processors Effective from May 25 2018
Additional information regarding Privacy and Security Governance.	<p>SendSafely is based on Amazon AWS which holds several ISO Certificate – incl. ISO27000 – Information Security. The Sendsafely statement regarding GDPR compliance: https://blog.sendsafely.com/sendsafely-gdpr</p>	<p>SendSafely is based on Amazon AWS which holds several ISO Certificate – incl. ISO27000 – Information Security.</p>