

Comparing the new and previous Data Processing Agreement and List of pre-approved sub-processors

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 April 1, 2022, the updated agreements automatically replace the current versions that your company have.

The 2 new documents affected by changes are:

Data Processing Agreement (DPA)

- The Standard Contractual Clause (SCC) standard have been upgraded and we have removed a reference to the outdated EU regulation.

List of pre-approved Sub-processors

- Link to Information Regarding Privacy and security governance is updated
- A new service entity is added: SuperOffice AI services

Section	Updated Data Processing Agreement Effective from April 1, 2022	Previous Data Processing Agreement Effective from Oct 20, 2020
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 the 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, 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 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”) (2010/87/EU) for processors, the controller hereby authorizes the Data Processor to enter into Such SCCs with the sub-processor on behalf of the Controller.</p>
Sub-processor	Updated List of pre-approved sub-processors Effective from April 1, 2022	Previous List of pre-approved sub-processors Effective from Oct 20, 2020
Microsoft Corporation	<p>Link to Additional Information regarding privacy and Security Governance is changed.</p> <p>Data Residency in Azure Microsoft https://azure.microsoft.com/en-us/global-infrastructure/data-residency/#overview</p>	https://www.microsoft.com/en-us/trustcenter/cloudservices/azure
Microsoft Corporation	New service entity added: SuperOffice AI Services	n/a

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