

Comparing the old and new 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 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 (DPA)**
- **List of pre-approved Sub-processors**

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the Schrems II EU-court ruling in July 2020, the use of EU-US Privacy Shield to protect data in third countries is no longer valid.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 Data Processing Agreement</u> Effective from Oct 20, 2020	<u>Old Data Processing Agreement</u> 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 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.</p> <p>Should the Controller approve such transfer of Personal Data, the Processor is obligated to cooperate with the Controller in order to ensure compliant transfers. <u>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.</u></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.</p> <p>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 List of pre-approved sub-processors</u> Effective from Oct 20, 2020	<u>Old List of pre-approved sub-processors</u> Effective from May 25 2018
A. SuperOffice AS is the provider of SuperOffice CRM Online cloud service	<p><u>Additional information regarding Privacy and Security Governance.</u></p> <p><u>Security audit Report ISAE3000 is available on request.</u></p>	New information
1. Visma IT & Communications AS	<p>The Personal Data will be subject to the following Processing activities.</p> <p><u>Storage of data in the CRM Database.</u></p> <p><u>Back up and restoring of data when requested.</u></p> <p><u>Monitoring and incident-related activities.</u></p> <p><u>Access control and logging.</u></p>	None

<p>2. Mailgun Technologies Inc.</p>	<p>The Personal Data to be Processed concerns the following categories of Data Subjects: Email recipients in e-marketing campaigns and customer service tickets. <u>Senders and recipients of email messages.</u></p>	<p>Email recipients in e-marketing campaigns and customer service tickets.</p>
	<p>Categories of Personal Data <u>The personal data processed includes name, email, IP address and personal data included in message content.</u> ..Email address and free text content of emails.</p>	<p>Email address and free-text content of emails.</p>
	<p>The Personal Data will be subject to the following Processing activities. <u>Receipt of email addresses from SuperOffice Mailservice.</u> <u>Sending email messages to the selected email addresses.</u> <u>Receiving and sending replies related to service-tickets in SuperOffice Service Storage in-max 72 hours for the purpose of resending mails in fault situations.</u></p>	<p>None</p>
<p>Additional information regarding Privacy and Security Governance.</p>	<p><u>Sub-processor agreement in place requiring adequate privacy and information security measures</u></p>	<p>Certified under the EU-U.S. Privacy Shield Framework, and the U.S. – Swiss Safe Harbor Framework.</p>
<p>3. InfoBridge B.V</p>	<p>Entity Company Name InfoBridge B.V., Europalaan 24F, 5232 BC 's-Hertogenbosch, NL <u>InfoBridge B.V. is a 100% owned subsidiary of SuperOffice AS from 1st of September 2020.</u></p>	<p>InfoBridge B.V., Europalaan 24F, 5232 BC 's-Hertogenbosch, Netherlands</p>
	<p>Entity Type and description of Service Calendar synchronization Service between SuperOffice CRM and <u>the</u> Calendaring Systems (Microsoft Office-365 <u>and</u> Google G-Suite).</p>	<p>Calendar synchronization Service between SuperOffice CRM and various Calendar ing Systems (Microsoft Office 365, Google G-Suite).</p>

	<u>No personal data is stored in the InfoBridge Service itself, only in SuperOffice CRM Online and Microsoft 365 / Google G-Suite.</u>	
	<p>The Personal Data will be subject to the following Processing activities.</p> <p><u>Calendar None entries in the SuperOffice Calendar will be synchronized (inserted/updated/deleted) in the Microsoft 365/Google calendar.</u></p> <p><u>Calendar entries in the Microsoft 365/Google calendar will be synchronized (inserted/updated/deleted) in the SuperOffice Calendar.</u></p> <p><u>Invitations coming via email in MS365/Google will be inserted into the SuperOffice Calendar if accepted.</u></p>	None
	<p>Additional information regarding Privacy and Security Governance.</p> <p><u>Sub-processor agreement in place requiring adequate privacy and security measures</u></p>	
4. Microsoft Corporation	<p>Entity Type and description of Service</p> <p>Document Storage Provider. All documents stored in SuperOffice CRM Online is stored in a Microsoft Azure service.</p> <p>Documents are stored as separate files. No Personal Data (or any other metadata) is stored in connection with the document. <u>The document itself may contain unstructured personal data.</u></p>	<p>Document Storage Provider. All documents stored in SuperOffice CRM Online is stored in a Microsoft Azure service.</p> <p>Documents are stored as separate files. No Personal Data (or any other metadata) is stored in connection with the document.</p>
	<p>The Personal Data will be subject to the following Processing activities.</p> <p><u>None Structured personal data is not stored in Azure, only the document itself. Documents may be containing unstructured personal data. Documents are stored, backed-up and restored when requested.</u></p>	None
<i>D. Integration to Identity Providers (NEW PARAGRAPH)</i>		<i>Did not exist</i>