

SUB-PROCESSORS

Updated 10 May 2023

List of sub-processors

Name	Address	Description of the processing	Location
Microsoft Ireland Operations Ltd (Microsoft Azure)	Microsoft Plc. Leopardstown South County Business Park Dublin 18 Ireland.	Operation of all system infrastructure including application servers, backup, databases and other data storage components.	Data is stored in European data centres in Western Europe.

Specifics regarding Microsoft:

Microsoft is the data exporter (not .legal), and as such, Microsoft's Standard Contractual Clauses ("SCC"), which form the basis for (potential) transfers to third countries, are entered into between the relevant Microsoft companies and not between .legal and Microsoft. Therefore, it is not part of .legal's contractual framework with Microsoft. Nonetheless, it is established that Microsoft has executed the SCC's internally, as indicated by (1) Microsoft's whitepaper regarding TIA and (2) the data processing agreement, which specifies that "all transfers of Customer Data, Professional Services Data, and Personal Data outside of the EU, EEA, UK, and Switzerland (...) shall be subject to the Standard Contractual Clauses".

Transfer Impact Assessment (TIA):

In the event of personal data being transferred outside the EU/EEA in connection with the use of sub-processors, .legal will, at the request of the controller, provide the relevant Transfer Impact Assessment (TIA) to the controller.