

## Summary of the updates in the Data Processing Agreement

### Version 2.6

The Data Processing Agreement has been updated to accommodate the initial phase of Continia's Geographical Location Segmentation project, focusing on complying with Australian data privacy requirements. This update applies to new customers running version 24 of the applicable Continia Services and supported Business Central version/s depending on whether the solution is Cloud or On-Premises based (for detailed information, refer to Annex II). Detailed information on each Continia service and relevant sub-processor can be found in section 2.2.4 - 2.2.6, section 2.2.9 - 2.2.10 and Annex IV.

### Version 2.5

The Data Processing Agreement has been updated to accommodate various data processing scenarios, mainly to the effect where Continia may act as the data processor or sub-processor within a given processing task.

In Annex II, two new services have been added:

- Support Services (refer to Annex II, 2.2.1 for detailed information)
- Professional Services (refer to Annex II, 2.2.2 for detailed information)

In Annex IV, Zendesk has been added as a sub-processor, providing platform and hosting for Support Services. Additionally, a processing location for Microsoft 365 within the EU has been incorporated.

These updates aim to ensure compliance with data protection regulations and enhance the clarity of roles and responsibilities within data processing arrangements.

### Version 2.4

The Data Processing Agreement has been updated to the effect that geographical hosting location has been added for one subprocessor, Tickstar.

### Version 2.3

The Data Processing Agreement clauses have been updated for minor corrections in wordings.

- Reference to Regulation (EU) 2018/1725 has been removed from the DPA since it is not applicable to Continia's processing.
- Reference to "Union or Member state law" has been amended to "applicable law".
- In Clause 2, additional information regarding the processor's option to notify end users of changes and updates in the DPA by in-solutions notification.

- In Clause 5, method of documenting additional contract participants via. Docking clause has been changed from having to sign a new DPA to providing a written consent from the controller.
- In Clause 7.4, clarification regarding security of processing and future technical and organizational measures to fulfill obligations.
- In Clause 7.7, clarification regarding change of sub-processor notification and that further use of the services is considered an active acceptance of the changes or updates.
- In Clause 7.8, wording regarding international transfer has been changed to that effect that Continia will only transfer data on the basis of documented instruction from the controller or if required to do so by applicable law, as well as what compliance requirements have to be in place.
- In Clause 8.d, wording has been changed to correctly reference further information on technical and organizational measure processes.

In Annex I: Additional information has been provided regarding digital acceptance, to that effect that the Controller does not have to physically sign the DPA to provide the necessary contact information.

In Annex II the Data Processing Agreement has been updated with a new format of information on Continia Services focusing on DPA relevance. Furthermore, the list of services has been revised, adding new services, and removing discontinued services.

In Annex IV KMD has been added as sub-processor providing Danish NemHandel transaction access point.

## **Version 2.2**

The Data Processing Agreement has been updated with a new description of how changes in the Data Processing Agreement will be announced. Continia will announce any changes on their website ([www.continia.com](http://www.continia.com)) and through a mailing list that customers can subscribe to.

Furthermore, the Data Processing Agreement has been updated regarding the accessibility of the Security Manual, which can be provided upon further agreement if deemed necessary.

Finally, the Data Processing Agreement has been updated for minor corrections as paragraph numbering and wordings.

- In Clause 2, Invariability of the Clauses, a description of how changes in the Data Processing Agreement will be announced has been added by section C.
- In Annex II, 2.4.1. Personal Data related to Continia Document Capture, the wording of paragraph 4. Sensitivity has been rephased.
- In Annex II, 2.4.3. Personal Data related to Continia Web Approval Portal, the wording of paragraph 4. Sensitivity has been rephased.
- In Annex III, 3.1. Measures regarding the security of processing, the accessibility of the Security Manual has been updated.

In Annex III, the paragraph numbering has been corrected, as paragraphs 3.4 and 3.5 had the same numbering in the previous Data Processing Agreement. These are the affected paragraphs: 3.4. Procedures for audits, including inspections, of the processing of personal data being performed by sub-processors,

and 3.5. Procedure for assessing and implementing measures derived from subsequent instructions from the controller to the processor.

### **Version 2.1**

The Data Processing Agreement has been updated with a new description in Annex II of the Expense Management data processing. Continia has introduced OCR processing for receipts, including adding the applied OCR service provider to the sub-processor list in Annex IV.

Finally, a data processing description of Continia Delivery Network has been added.

- In Annex II, under 2.4.2 Personal Data related to Continia Expense Management, the flow description has been updated with a description of the scan and extraction.
- In Annex IV, List of sub-processors, Klippa App B.V. has been added.
- In Annex II, 2.4.9. Personal Data related to Continia Delivery Network has been added, containing a processing description of Continia Delivery Network.