

Release Management Documentation of Personal Data Processor Agreement



Date: 2022-02-10

TellusTalk AB, corp. ID no. 556429-8213

2022-02-10

Version 2022-02-10 is established with below changes and published at www.tellustalk.com

6.1

Second paragraph, added. Description of the routine for changes of the sub processors list is moved here from Appendix 1, Instructions.

Appendix 1 - Instructions

Paragraph regarding the routine for changes of the sub processors list is moved to 6.1, see above.

New paragraph for custom Personal Data Processor Agreements: Other Instructions for data deletion and routing other than standard.

Appendix 2 - Security Measures

Reinstated to comply with the industry association standard.

2021-02-08

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7.1

Added the following clarification:

“Transfer of personal data to telecom operators is necessary to fulfil the Agreement. Telecom operators are not considered data processors or sub-processors and consequently no sub-processor agreements will apply. Telecom operators are separate data controllers, cf. section 6.4 above.”

2021-02-02

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6.4

Changed the sentence “Telecoms operators have proclaimed that they are not sub-processors” to “Telecom operators are not sub-processors”

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Added information about when transfer of data might occur along with a recommendation to take care when sending personal data.

Also a clarification that sub-processors in third country will only be used after a written consent with the Data Controller.

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2018-07-20

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5.2

Clarification that, at minimum, security measures are met by those stated by the GDPR.

6.1

1:st passage, (i): the wording for information about new sub-processors has been corrected so that it does not contradict the text of "Sub-processors" in Appendix 1.

2:nd passage: termination period is corrected från 3 to 1 month

Added 3:rd passage: clarification about excluding sub-processors

Appendix 1

Sub-processors: clarification about communication regarding new sub-processors

Appendix 2

Is removed as it does not contribute, minimum security is set by GDPR. See also 5.2.

2018-04-11

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