

# Release Management Documentation of Personal Data Processor Agreement



Date: 2023-05-15

TellusTalk AB, corp. ID no. 556429-8213

## 2023-05-15

Version 2023-05-15 is established with below changes and published at [www.tellustalk.com](http://www.tellustalk.com)

The entire DPA has been replaced with the standard contractual clauses issued by the European Commission: [COMMISSION IMPLEMENTING DECISION \(EU\) 2021/915 of 4 June 2021 on standard contractual clauses between controllers and processors under Article 28\(7\) of Regulation \(EU\) 2016/679 of the European Parliament and of the Council and Article 29\(7\) of Regulation \(EU\) 2018/1725 of the European Parliament and of the Council](#)

### Annex II Instructions

Updated to adhere to Annex II in the standard contractual clauses.

### Annex III Security measures

No change.

## 2022-02-10

Version 2022-02-10 is established with below changes and published at [www.tellustalk.com](http://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

Version 2021-02-08 is established with below changes and published at [www.tellustalk.com](http://www.tellustalk.com)

### 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.”

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## 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.

## 2018-07-20

Version 2018-07-20 is established with below changes and published at [www.tellustalk.com](http://www.tellustalk.com)

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

Version 2018-04-11 is established and published at [www.tellustalk.com](http://www.tellustalk.com)