DPA Residency Annex — EU/EEA

Just Software ApS · Approved

Version	v1.8	**Approved on**	8 November 2026
Approval authority	CISO or CTO	**Next review due**	—
Last reviewed	—	**Review interval**	365 days
Relevant frameworks	GDPR		

Residency Annex — EU/EEA

Annex to the Data Processing Agreement — Core (Appendix D.9)

Applies to	Tenants whose primary region, or whose secondary region, is in the EU/EEA data residency boundary, as selected in the Customer Schedule

This annex states the locations, the sub-processors used for tenants whose primary region is in this boundary, and the transfer tools for data held in or leaving this boundary. Sub-processors used in every boundary, and the optional AI providers for AI-assisted diagnostics, are in Appendix B.1 of the Core DPA and are not repeated here.

R.1 Regions. Tenants whose primary region is in this boundary are hosted in Microsoft Azure regions within the EU/EEA. Their secondary region is either another Azure region within the EU/EEA or, where the data controller selects it in the Customer Schedule, a region in another boundary, whose Residency Annex then also applies to the data held there (Core Appendix D.9). Product data, including backups, is held in both regions. The customer and administration portal and operational telemetry are hosted within the EU/EEA. The Azure regions currently in use are published at https://just-software.com/trust.

R.2 Sub-processors for tenants whose primary region is in this boundary.

Name	Registration no.	Address	Processing location	Description of processing	Retention
Scaleway SAS (Scaleway Transactional Email)	R.C.S. Paris 433 115 904	8 rue de la Ville-l'Évêque, 75008 Paris, France	EU (France)	Transactional e-mail delivery: recipient e-mail addresses, message content and delivery metadata	Up to 7 days

R.3 Transfers. Data held in this boundary is not transferred outside the EU/EEA, except that:

- where the data controller selects a secondary region in another boundary, personal data replicated to that region, including backups, is transferred on the terms of the Residency Annex for that boundary. The data controller's selection is its documented instruction for that transfer (Core Appendix C.6);
- where the data controller enables AI-assisted diagnostics and selects an AI provider located outside the EU/EEA, the diagnostic data it submits is transferred to that provider on the transfer tool stated in Core Appendix B.1(b). The data controller's selection is its documented instruction for that transfer (Core Appendix C.6). Selecting the EU-located provider keeps diagnostic data within the EU/EEA; and
- the data controller authorises incidental remote access to the underlying cloud infrastructure by Microsoft support personnel located outside the EU/EEA, where strictly necessary to resolve an infrastructure fault. Such access is governed by the EU Standard Contractual Clauses (Commission Implementing Decision (EU) 2021/914) and the EU-U.S. Data Privacy Framework in the Microsoft Products and Services Data Protection Addendum.

Transactional e-mail for tenants whose primary region is in this boundary is delivered by Scaleway SAS and processed within the EU. It is not routed through the transactional e-mail provider of the North America Residency Annex.