

Standard Contractual Clauses (EU 2021/914) — Module Two

Populated Annexes I, II, III

These annexes form an integral part of the Standard Contractual Clauses (Module Two — Controller-to-Processor) adopted by Commission Implementing Decision (EU) 2021/914 of 4 June 2021, as incorporated by reference into the Data Processing Agreement (DPA) between the Customer (data exporter / Controller) and Black Cat Security SAS (data importer / Processor).

The full SCC text is available at ``/legal/scc-module-2-2021-914.pdf``.

ANNEX I

A. List of Parties

Data exporter (Controller): [Customer organisation as identified in the Service order or subscription record]

- Address: [as per Customer record]
- Contact: [Customer's data-protection contact]
- Activities relevant to the data transferred: use of the Black Cat SSPM Service to monitor security posture of the Customer's SaaS estate.
- Role: Controller.

Data importer (Processor): Black Cat Security SAS

- Address: as published in the Legal Notice at ``/legal``
- Contact: privacy@blackcatsecurity.fr
- Activities relevant to the data transferred: provision of the Black Cat SSPM Service.
- Role: Processor.

B. Description of Transfer

C. Competent Supervisory Authority

Commission Nationale de l'Informatique et des Libertés (CNIL), 3 Place de Fontenoy, 75007 Paris, France. Website: <https://www.cnil.fr>.

ANNEX II — Technical and Organisational Measures

Mirrors DPA §6:

- **Encryption at rest:** AES-256.
 - **Encryption in transit:** TLS 1.2 or higher; HSTS enabled.
 - **Access control:** role-based access control (RBAC) for all internal systems; multi-factor authentication mandatory for all personnel with access to personal data; least-privilege provisioning, reviewed quarterly.
 - **Audit logging:** comprehensive logs of all access to and modifications of customer data, retained per DPA §11.
 - **Vulnerability management:** regular security assessments and vulnerability testing.
 - **Incident response:** documented procedures with defined escalation and notification processes; controller breach notification within 72 hours per DPA §7.
 - **Personnel:** annual + onboarding security training; written confidentiality undertakings.
 - **Data minimisation:** only configuration metadata and identity attributes necessary for posture assessment are processed.
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ANNEX III — Sub-Processors

The current list of sub-processors is published at ``/sub-processors``. As at the date of this annex:

Item	Value
Categories of data subjects	End users of Customer's connected SaaS applications; platform administrators.
Categories of personal data	SaaS configuration data; identity data (names, emails, roles); security findings; audit logs. (Mirrors DPA §4.)
Sensitive data	None intentionally processed.
Frequency of transfer	Continuous, on-demand.
Nature of processing	Collection, organisation, storage, retrieval, analysis, deletion.
Purpose	Security posture assessment, identity risk analysis, compliance monitoring.

Retention	As per DPA §11 (return or deletion at termination, customer election; 30-day export window).		
Sub-processors	As listed in Annex III below.		
Name	Purpose	Location	Transfer mechanism
Cloudflare, Inc.	Hosting, CDN, edge compute, DDoS protection	USA (DPF certified) + EU edge	EU-US Data Privacy Framework + SCCs (fallback)
Paddle.com Market Ltd	Merchant of Record — billing, VAT, payments, invoicing	United Kingdom	UK adequacy (Decision (EU) 2021/1772)
Functional Software, Inc. (Sentry)	Error monitoring and performance telemetry	USA (DPF certified)	EU-US Data Privacy Framework + SCCs (fallback)
Ory Corp	Identity and authentication (Kratos) — email, MFA, sessions	Germany (EEA)	EEA — no third-country transfer

The Processor will notify the Controller of any addition or change with at least 30 days advance notice (DPA §5).

Document control

- Annex version: 1.0
- Date: 2026-04-18
- Source DPA: `/dpa` (EN) / `/fr/dpa` (FR)
- Source SCC text: `/legal/scc-module-2-2021-914.pdf`
- Public sub-processor list: `/sub-processors`