

Chapter 8 Table for HDS

Business name of the actor	Role in the hosting service (Host/processor of the Host)	HDS certified (yes / no / exempted)	SecNumCloud 3.2 qualified	Hosting activities in which the player is involved	Access to personal health data from countries outside the European Economic Area, by the Host or one of its processors (Requirement No 29 of the HDS framework)	Host or processor subject to a risk of access to personal health data from countries outside the European Economic Area, imposed by the legislation of a third country in breach of EU law (Requirement no 30 of the HDS framework)
Varonis Systems, Inc.	Processor (engaging party)	Yes	No	3, 4	► Not covered by an adequacy decision within the meaning of Article 45 of the GDPR: USA, but subject to EU-US the Data Privacy Framework (DPF).	Yes: USA
Varonis Systems Ltd.	Sub Processor	Yes	No	3, 4	Yes ► Covered by an adequacy decision within the meaning of Article 45 of the GDPR: Israel	No

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Varonis Systems (Ireland) Limited	Sub Processor	Yes	No	3, 4	No, no access to data from a country outside the European Economic Area.	No
Microsoft (Azure)	Sub Processor	Yes	No	1-4 and 6	No, no access to data from a country outside the European Economic Area.	No
Amazon (AWS)	Sub Processor	Yes	No	1-4 and 6	No, no access to data from a country outside the European Economic Area.	No
DataDog (only for DatAdvantage Cloud)	Sub Processor	No	No	3, 4	No, no access to data from a country outside the European Economic Area.	No
Imperva	Sub Processor	No	No	3, 4	No, no access to data from a country outside the European Economic Area.	No
Box	Sub Processor	Yes	No	3. 4	No, no access to data from a country outside the European Economic Area.	No

Cloudflare (only for Atlas AI)	Sub Processor	No	No	3, 4	Access is based on location of the customer's user connecting to Varonis. So if user located in EEA, no access to data from outside the EEA.	No
Torq.IO SOAR (only for MDDR Services)	Sub Processor	No	No	3, 4	No, no access to data from a country outside the European Economic Area.	No