



MediumAxis SCCs Annex Template

File: mediumaxis-sccs-annex.pdf

Purpose: Modular annex to attach EU/UK Standard Contractual
Clauses to the main DPA

Version: 1.0 | **Last Updated:** March 2026

⚠ Important: This document is an *Annex* to the EU Standard Contractual Clauses (Commission Implementing Decision 2021/914) and/or the UK International Data Transfer Addendum. It does **not** replace the official SCC text. The full, unmodified SCCs must be attached to this Annex when executed.

ANNEX TO STANDARD CONTRACTUAL CLAUSES

For International Transfers of Personal Data

Between:

DATA EXPORTER (Controller):

[Customer Legal Name]

[Address]

[Contact: privacy@customer.com]

DATA IMPORTER (Processor):

MediumAxis Ltd.

Thailand, Chaing Mai, 50210, Mu Ban Siriporn 2, 199/61

Email: privacy@mediumaxis.com

Website: <https://mediumaxis.com>

Reference: [MediumAxis DPA v2.1](#)

Effective Date: [Date]

This Annex completes the Modular Standard Contractual Clauses approved by the European Commission (Implementing Decision 2021/914) and/or the UK International Data Transfer Addendum.

1. HOW TO USE THIS ANNEX

✓ **Step 1:** Download the official EU SCCs:

 [EU Commission SCCs 2021 \(PDF\)](#)

✓ **Step 2:** Select **Module Two: Controller → Processor** (most common for SaaS/B2B services).

✓ **Step 3:** Complete the variable fields in this Annex (Sections 2–4 below).

✓ **Step 4:** Attach this completed Annex + the unmodified official SCC text to your signed DPA.

✓ **Step 5 (UK only):** If transferring from the UK, also attach the [UK IDTA Addendum](#) and complete the UK-specific fields marked GB.

 **Note:** MediumAxis recommends customers consult legal counsel to confirm the correct Module and jurisdictional applicability.

2. ANNEX I: DETAILS OF THE TRANSFER

(Complete per Clause 7 of the SCCs)

A. List of Parties

Role	Entity	Contact for Data Protection Queries
Data Exporter (Controller)	[Customer Name & Address]	[Customer DPO/Privacy Contact]

Role	Entity	Contact for Data Protection Queries
Data Importer (Processor)	MediumAxis Ltd. Thailand, Chiang Mai, 50210, Mu Ban Siriporn 2, 199/61	privacy@mediumaxis.com

B. Description of Transfer

Field	Details
Duration of Processing	Co-terminous with the Main Agreement/DPA
Nature & Purpose	Provision of B2B intelligence, lead management, SaaS platform services, data enrichment, verification, and analytics
Categories of Data Subjects	Business contacts: employees, contractors, or representatives of corporate entities (e.g., name, business email, job title, company)
Categories of Personal Data	Name, business email address, business phone number, job title, company name, professional social profile URLs, firmographic data
Sensitive Data?	 No special category data (GDPR Art. 9) is processed under this Agreement
Frequency of Transfer	Continuous / as needed per Service usage
Destination Country(ies)	United States, Germany, France, Canada, Singapore, New Zealand (see Subprocessor List)

C. Competent Supervisory Authority (EU) EU

Complete if Exporter is in the EU:

The supervisory authority of the Data Exporter's main establishment:

[Insert Authority, e.g., "CNIL – France" or "ICO – UK (for UK GDPR)"]

D. Competent Supervisory Authority (UK) GB

Complete if Exporter is in the UK:

Information Commissioner's Office (ICO)

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, United Kingdom

<https://ico.org.uk>

3. ANNEX II: TECHNICAL AND ORGANIZATIONAL MEASURES

(Complete per Clause 8 & 9 of the SCCs)

MediumAxis implements the security measures described in **Annex B of the main DPA**, summarized below:

Measure Category	Implementation
Encryption	TLS 1.3 in transit; AES-256 at rest for stored data
Access Control	Role-based access (RBAC), MFA for staff, least-privilege principle
Infrastructure Security	ISO 27001-certified providers (Hetzner, OVH, Cloudflare); firewalls, IDS/IPS
Physical Security	Secured data centers with biometric access, 24/7 monitoring
Incident Response	Documented playbook; notification to Customer within 72 hours of confirmed breach
Data Minimization	Processing limited to data necessary for Service delivery
Employee Training	Annual privacy/security training; confidentiality agreements
Testing & Evaluation	Quarterly vulnerability scans; annual penetration testing

 **Full TOMs:** Available upon request for enterprise customers or supervisory authorities.

 **Live Subprocessor List:** <https://mediumaxis.com/data-processing-agreement/#subprocessors>

4. ANNEX III: LIST OF SUB-PROCESSORS

(Complete per Clause 9 of the SCCs)

 **Dynamic Reference Approach:** To avoid re-executing this Annex for every vendor change, the Parties agree that the authoritative, up-to-date list of authorized Sub-processors is maintained at: <https://mediumaxis.com/data-processing-agreement/#subprocessors>

Current Key Sub-processors (as of [Date]):

Subprocessor	Location	Service Provided
Hetzner Online GmbH	DE Germany	Data processing & verification
OVHcloud SAS	FR France, DE Germany, CA Canada, SG Singapore	Email dispatch, backup processing
Mega Ltd.	NZ New Zealand	Encrypted backup storage
Cloudflare, Inc.	Global (275+ cities)	CDN, DDoS protection, DNS
Microsoft Corporation	us United States (with EU safeguards)	Website analytics (Clarity)
JivoChat (JivoSite)	RU Russia / BR Brazil / EU EU options	Customer support communications
NameCheap, Inc.	us United States	Transactional email delivery

 **Updates:** MediumAxis provides 14 days' prior notice of material changes via email to active Customers. All Sub-processors are bound by written agreements with data protection obligations no less protective than these SCCs.

5. UK INTERNATIONAL DATA TRANSFER ADDENDUM GB

(Complete only if UK GDPR applies)

Attach the official [UK IDTA Addendum](#) and complete the following tables:

Table 1: The Parties

Role	Entity
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Exporter	[Customer Name]
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Importer	MediumAxis Ltd.
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Table 2: Key Details of Transfer

(Reference Annex I, Section B above)

Table 3: Security Measures

(Reference Annex II above)

Table 4: Overseas Regulator

Not applicable (MediumAxis is not subject to direct regulation by a non-UK overseas regulator for this processing).

6. SIGNATURE BLOCKS

EXECUTED by the Parties as a deed on the date first written above.

SIGNED for and on behalf of DATA EXPORTER (Controller):

Signature: _____

Name: _____

Title: _____

Date: _____

SIGNED for and on behalf of DATA IMPORTER (Processor):

MediumAxis LLC.

Signature: _____

Name: _____

Title: _____

Date: _____



APPENDIX: OFFICIAL SCC TEXT

(Do not modify – attach as separate pages – to be attached by parties)

 **Attach here:** The full, unmodified text of:

- **EU SCCs (Module Two: Controller → Processor)** – Commission Implementing Decision (EU) 2021/914
- **AND/OR** UK International Data Transfer Addendum (if applicable)

 Official EU SCCs source: https://commission.europa.eu/document/download/9c5e0c6e-8e6a-4c3e-9c3e-3c3e3c3e3c3e_en

 Official UK Addendum source: <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/international-data-transfer-agreement-and-guidance/>