

## Replenit DPF Adequacy List

Last Updated: 28.11.2025

### 1. Executive Summary

This assessment evaluates the risk associated with transferring personal data to the United States in light of the *Schrems II* ruling (CJEU Case C-311/18).

1. **DPF Adequacy:** The majority of our sub-processors (Google, Microsoft, Databricks, New Relic) are active participants in the **EU-U.S. Data Privacy Framework (DPF)**.


### 2. Category A: Vendors with Adequacy Decision (DPF)

The following sub-processors are active participants in the **EU-U.S. Data Privacy Framework (DPF)**. On July 10, 2023, the European Commission adopted an adequacy decision concluding that US organizations participating in the DPF provide a level of data protection essentially equivalent to the EU.

**Risk Conclusion:** Transfer is permitted without further supplementary measures (Art. 45 GDPR).

Sub-processor	Transfer Mechanism	Verification Status (as of Nov 2025)
Databricks Inc.	Adequacy Decision (DPF)	Active (Covered by DPF Adequacy)
Google LLC	Adequacy Decision (DPF)	Active (Covered by DPF Adequacy)
Microsoft Corp.	Adequacy Decision (DPF)	Active (Covered by DPF Adequacy)
New Relic Inc.	Adequacy Decision (DPF)	Active (Covered by DPF Adequacy)
Github Inc.	Adequacy Decision (DPF)	Active (Covered by DPF Adequacy)

Google LLC



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A B C D E F G H I J K L M N O P Q R S T U V W X Y Z 0 1 2 3 4 5 6 7 8 9 ALL


**Google LLC**  
Mountain View, CA

FRAMEWORK		STATUS	COVERED DATA
EU-U.S. Data Privacy Framework	<input checked="" type="checkbox"/>	Active	HR Data
Swiss-U.S. Data Privacy Framework	<input checked="" type="checkbox"/>	Active	HR Data
UK Extension to the EU-U.S. Data Privacy Framework	<input checked="" type="checkbox"/>	Active	HR Data

+1 Covered Entities

Questions or Complaints

## Databricks Inc.



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**Databricks, Inc.**  
San Francisco, CA

FRAMEWORK		STATUS	COVERED DATA
EU-U.S. Data Privacy Framework	<input checked="" type="checkbox"/>	Active	Non-HR Data
Swiss-U.S. Data Privacy Framework	<input checked="" type="checkbox"/>	Active	Non-HR Data
UK Extension to the EU-U.S. Data Privacy Framework	<input checked="" type="checkbox"/>	Active	Non-HR Data

Questions or Complaints

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## Microsoft Corp.



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**Microsoft Corporation**  
Redmond, WA

FRAMEWORK		STATUS	COVERED DATA
EU-U.S. Data Privacy Framework	<input type="checkbox"/>	Active	HR Data Non-HR Data
Swiss-U.S. Data Privacy Framework	<input type="checkbox"/>	Active	HR Data Non-HR Data
UK Extension to the EU-U.S. Data Privacy Framework	<input type="checkbox"/>	Active	HR Data Non-HR Data

+14 Covered Entities  

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## New Relic Inc



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**New Relic**  
San Francisco, CA

FRAMEWORK		STATUS	COVERED DATA
EU-U.S. Data Privacy Framework	<input type="checkbox"/>	Active	Non-HR Data
Swiss-U.S. Data Privacy Framework	<input type="checkbox"/>	Active	Non-HR Data
UK Extension to the EU-U.S. Data Privacy Framework	<input type="checkbox"/>	Active	Non-HR Data

+1 Covered Entities  

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## Github Inc.


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#### GitHub

San Francisco, CA

#### FRAMEWORK

EU-U.S. Data Privacy Framework



Swiss-U.S. Data Privacy Framework



UK Extension to the EU-U.S. Data Privacy Framework



#### STATUS

Active

Active

Active

#### COVERED DATA

Non-HR Data

Non-HR Data

Non-HR Data

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