

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)

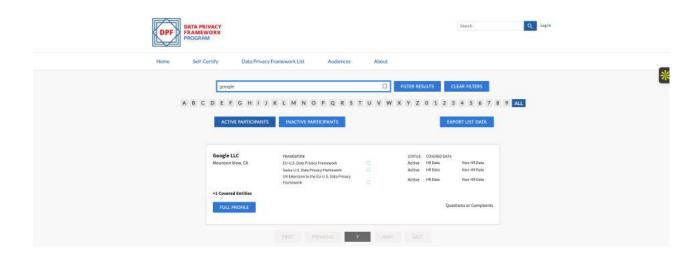
The following sub-processors are active participants in the **EU-U.S. Data Privacy Framework (DPF)**. On July 10, 2023, the European Commission adopted an adequacy decision concluding that US organizations participating in the DPF provide a level of data protection essentially equivalent to the EU.

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

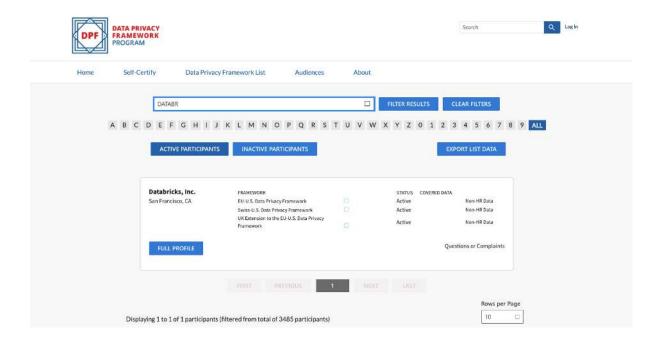
Sub-processor	Transfer Mechanism	Verification Status (as of Nov 2025)
Databricks Inc.	Adequacy Decision (DPF)	Active (Covered by DPF Adequacy)
Google LLC	Adequacy Decision (DPF)	Active (Covered by DPF Adequacy)
Microsoft Corp.	Adequacy Decision (DPF)	Active (Covered by DPF Adequacy)
New Relic Inc.	Adequacy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

Google LLC



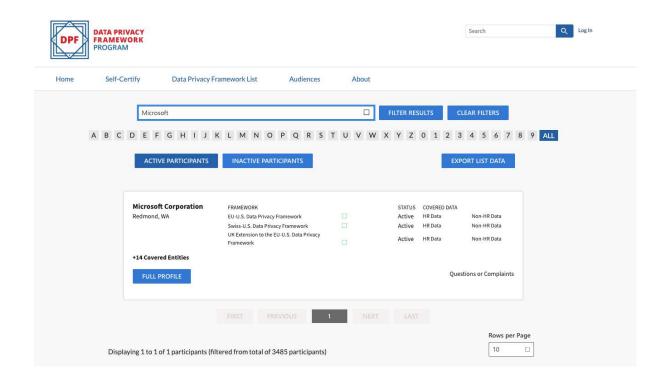


Databricks Inc.

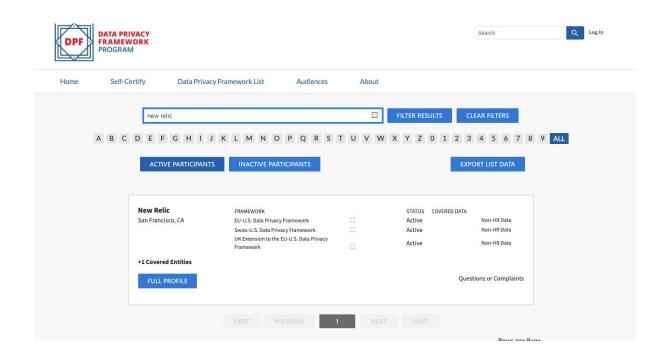


Microsoft Corp.





New Relic Inc



Github Inc.



