

# Data Transfer Impact Assessment

This document is designed to provide information to assist Jamf customers with conducting data transfer impact assessments in connection with their use of Jamf's Product Offerings, as defined in our [SLASA](#), considering the Schrems II ruling of the Court of Justice of the European Union and the European Data Protection Board's related recommendations.

This document describes the legal regimes applicable to Jamf in the United States ("US"), the safeguards Jamf puts in place in connection with transfers of customer personal data from the European Economic Area ("EEA"), United Kingdom ("UK") or Switzerland, and Jamf's ability to comply with its obligations as "data importer" under the relevant personal data transfer mechanisms – the EEA Standard Contractual Clauses ("EEA SCCs"), UK Addendum, or the EEA SCCs subject to modifications and amendments prescribed by the Swiss Federal Data Protection and Information Commissioner ("FDPIC") ("Swiss SCCs").

Jamf safeguards the personal data our customers entrust us to process, particularly when circumstances require that we transfer that personal data to a third country lacking an adequacy decision — whether for the purposes of support, Hosted Services, or security review.

Where the customer is the controller of the data, Jamf may transfer customer's personal data outside of the customer's primary region to provide our services. For example, Jamf provides support and hosted services with staff from various countries around the world. Jamf employees may need to access personal data to provide these services. In a few circumstances, we may utilize vendors (as sub-processors to Jamf) outside our customers' primary regions.

The transfer impact assessment information below identifies and describes the risks associated with data transfers of personal data to third countries lacking an adequacy decision, as well as any supplementary measures we have taken — or have required our vendors to take — to safeguard personal data. Please see our [Data Processing Agreement for Jamf Customers](#) ("DPA") for additional details, such as the nature of the processing or the retention period of the data. In all cases, the categories of data subjects are the employees of Jamf customers (or students of Jamf customers if the customer is an education customer). For additional resources about Jamf's Software License and Service Agreement, DPA, and Privacy program, please visit [Jamf's Trust Center](#). Our list of [sub-processors](#) is also available in the Trust Center.

## Transfer Impact Assessment

Jamf's DPA incorporates the [EEA SCCs, UK Addendum, and Swiss SCCs](#). In response to the heightened requirements created by the [Schrems II](#) decision, the European Commission adopted the EEA SCCs, which require a data importer (Jamf in this case) to provide specific information about personal data transfers it undertakes, and requires the parties to conduct a

transfer impact assessment to evaluate risks involved with the transfer of personal data to countries outside the EEA. The EEA SCCs also require the parties to consider any relevant contractual, technical, and organizational safeguards to supplement the safeguards set forth in the EEA SCCs.

Please refer to Schedule 1 of the DPA for a description of personal data transfers, including the nature of Jamf's processing activities in connection with the provision of the services, the types of customer personal data transferred, and the categories of data subjects.

Please refer to Schedule 3 of the DPA to review the security measures Jamf has implemented to protect the personal data of our customers' data subjects.

## **Transfer of data to the US**

In response to Schrems II, the [European Data Protection Board \(EDPB\)](#) has made clear that approved standard contractual clauses remain valid data transfer mechanisms. As the EDPB states in its guidance, however, transfer mechanisms do not operate in a vacuum and may need to be paired with supplementary measures that enhance protection of personal data.

Jamf relies on its DPA as the transfer mechanism used to transfer personal data outside the EEA, UK and/or Switzerland. Jamf's DPA incorporates the EEA SCCs, UK Addendum, and Swiss SCCs. In addition, Jamf is certified as a participant in the EU-U.S. and Swiss-U.S. Data Privacy Frameworks, as well as the UK Extension to the EU-U.S. Data Privacy Framework. You can confirm Jamf's participation here: [Data Privacy Framework Participant Search](#).

## **EU data storage**

Most Jamf products have the option for customers to choose where their data is stored, including an option in the EEA. However, Jamf may need to process this data in other countries to support our customers, to provide our hosted services, and conduct security incident reviews.

Certain Jamf products do not allow for regional data hosting. For Jamf Manager for Android and Jamf Now, all data is hosted in the United States. Jamf Pro, Jamf Safe Internet, Jamf School, RapidID, PhishID, SafeID, Security Manager, and ShieldID allow for regional data hosting. In the case of Jamf Data Policy, Jamf Mobile Forensics, Jamf Private Access, and Jamf Threat Defense, data is only hosted in Ireland. Jamf Protect and Jamf Connect allow for regional data hosted except for certain functionality, in which case data is hosted in Ireland.

Please refer to Jamf's [Sub-processors documentation](#) to better understand where your data may be stored for each product or service you subscribe to.

## US Surveillance Laws

### Is Jamf subject to FISA 702, EO 12333 or the CLOUD Act?

Jamf, like most US-based SaaS companies, could technically be subject to [FISA 702](#) where it is deemed to be a remote computing service provider (“RCSP”). However, Jamf does not process personal data that is likely to be of interest to US intelligence agencies.

Furthermore, Jamf is not likely to be subject to upstream surveillance orders under FISA 702, the type of order principally addressed in, and deemed problematic by, the Schrems II decision. Jamf does not provide internet backbone services, but instead only carries traffic involving its own customers. To date, the US Government has interpreted and applied FISA 702 upstream orders to only target market providers that have traffic flowing through their internet backbone and that carry traffic for third parties (i.e., telecommunications carriers).

[EO 12333](#) contains no authorization to compel private companies (such as Jamf) to disclose personal data to US authorities and FISA 702 requires an independent court to authorize a specific type of foreign intelligence data acquisition which is generally unrelated to commercial information. If US intelligence agencies were interested in the type of data that Jamf processes, safeguards such as the requirement for authorization by an independent court and the necessity and proportionality requirements would protect data from excessive surveillance.

Where Jamf is deemed to be a RCSP, the CLOUD Act could apply to Jamf. However, we don’t believe the type of data processed on behalf of Jamf customers would be of interest to the U.S. Government or law enforcement authorities. The CLOUD Act does not make data easily accessible to the U.S. Government. It operates, in part to amend the Electronic Communications Privacy Act, which is a law that prescribes how law enforcement agencies may obtain information from technology companies. These laws address access to electronic data in relation to government efforts to protect public safety and combat serious crime, as well as to address conflicting laws between the U.S. and other countries by creating a framework for the U.S. Government to resolve conflicts and mutually agree to respect law and privacy.

Under the CLOUD Act, electronic content can only be requested from providers with a warrant that must identify the data being sought. The warrant must be approved by a court, and if approved, the CLOUD Act allows providers, like Jamf, to challenge the court order, particularly if there are conflicts with a foreign country’s laws. Jamf will take reasonably necessary actions if served with a warrant related to a CLOUD Act data request to protect data in its possession, including ensuring compliance with Section 4 g) of Jamf’s DPA. The CLOUD

Act does not allow the U.S. Government to collect bulk data – the data requested must be specific and the warrant needs to be based on probable cause for a crime.

### What is Jamf's experience dealing with government access requests?

To date, Jamf has never received a US National Security Request (including requests for access under FISA 702 or the CLOUD Act or direct access under EO 12333) in connection with customer personal data.

Therefore, while Jamf may technically be subject to the surveillance laws identified in Schrems II we have not been subject to these types of requests in our day-to-day business operations.

### Jamf Services' Processing Locations

Jamf provides hosting locations that may differ between products and features within certain products. Please review the locations of data hosting for the products and services you subscribe to in Jamf's [Sub-processors documentation](#).

## Onward transfers

### Australia

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| Purpose for transfer and any further processing | <p><b>Internal transfer:</b> Jamf has an office in Australia, and employees there may need to process the customer's personal data for the purposes of support or hosting services.</p> <p><b>Transfer to sub-processor:</b> Many of Jamf's Product Offerings use AWS to host services in Australia. Please <a href="#">see Jamf Cloud Hosting Locations</a> for more information.</p> <p>Jamf uses AWS for our edge services to process data in Australia as part of Jamf Security Cloud offerings, which have features included in Jamf Connect, Protect, Now, and Safe Internet. Data related to these products and features is then transferred to Ireland or the United States</p> |
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|                                                                                                               | <p>(hosting option for Jamf Safe Internet only) for storage and further processing.</p> <p>Please see our list of <a href="#">sub-processors</a> for specific information.</p>                                                                                                                                                                                                                                                                                                                        |
| The frequency of the transfer                                                                                 | <p><b>Internal transfer:</b> Data is transferred as needed to provide support and hosting services.</p> <p><b>Transfer to sub-processor:</b> Data is transferred continuously to AWS for customers in this region for hosting and edge services.</p>                                                                                                                                                                                                                                                  |
| Categories of personal data transferred                                                                       | <p>See Section B of Schedule 1 in Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a>.</p>                                                                                                                                                                                                                                                                                                                                                                                       |
| Sensitive data transferred                                                                                    | <p>Sensitive or Special Category data categories may be processed here depending on a customer's use of Jamf's Product Offerings and enabled features. Please refer to <a href="#">Jamf's Customer DPA</a> for more information on specific Sensitive data categories.</p>                                                                                                                                                                                                                            |
| Applied restrictions or safeguards that take into consideration the nature of the data and the risks involved | <p><b>Internal transfer:</b> Jamf's security measures for internal transfers are set forth in Schedule 3 of Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> and on Jamf's <a href="#">Security Portal</a>.</p> <p><b>Transfer to sub-processor:</b> Jamf enters into appropriate data processing agreements with all sub-processors that include data protection obligations that offer at least the same protection of personal data that Jamf offers to its customers.</p> |
| Supplemental Organizational, Technical, and Contractual Security Measures                                     | <p><b>Internal transfer:</b> Jamf's security measures for internal transfers are set forth in</p>                                                                                                                                                                                                                                                                                                                                                                                                     |

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|                                                         | <p>Schedule 3 of Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> and on Jamf's <a href="#">Security Portal</a>.</p> <p><b>Transfer to sub-processor:</b> Jamf enters into appropriate data processing agreements with all sub-processors that include data protection obligations that offer at least the same protection of personal data that Jamf offers to its customers. Sub-processors have been verified by Jamf's Information Security team to have sufficient technical and organizational security measures.</p>                                                                                                   |
| Jamf Policy for Law Enforcement Requests to Client Data | <p><b>Internal Transfer:</b> Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> compels us to notify our customer of requests unless explicitly prohibited from doing so by law. Please note that Jamf does not and cannot conduct real-time surveillance of customers. To date, Jamf has not received a request from law enforcement for client data.</p> <p><b>Transfer to sub-processor:</b> Jamf ensures that the data processing agreements with its sub-processors have appropriate obligations with respect to law enforcement requests to enable Jamf to comply with Jamf's obligations to customers under our DPA.</p> |
| Length of processing chain                              | <p><b>Internal transfer:</b> Data is transferred internally within Jamf.</p> <p><b>Transfer to sub-processor:</b> Data is transferred externally to our sub-processors.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Applicable transfer mechanism                           | <p><b>Internal transfer:</b> EEA SCCs, UK Addendum, and/or Swiss SCCs (as applicable), which are incorporated into</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

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|  | <p>Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a>.</p> <p><b>Transfer to sub-processor:</b> EEA SCCs, UK Addendum, and/or Swiss SCCs (as applicable) for onward transfers to our sub-processors.</p> |
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## Belgium

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| Purpose for transfer and any further processing                                                               | <p><b>Transfer to sub-processor:</b> Jamf Manager for Android uses Google Cloud Platform for cloud hosting in Belgium.</p> <p>Please see our list of <a href="#">sub-processors</a> for specific information.</p>                                                          |
| The frequency of the transfer                                                                                 | <p><b>Transfer to sub-processor:</b> Data is transferred continuously to Google Cloud Platform for cloud hosting.</p>                                                                                                                                                      |
| Categories of personal data transferred                                                                       | <p>See Section B of Schedule 1 in Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a>.</p>                                                                                                                                                            |
| Sensitive data transferred                                                                                    | <p>Sensitive or Special Category data categories may be processed here depending on a customer's use of Jamf's Product Offerings and enabled features. Please refer to <a href="#">Jamf's Customer DPA</a> for more information on specific Sensitive data categories.</p> |
| Applied restrictions or safeguards that take into consideration the nature of the data and the risks involved | <p><b>Transfer to sub-processor:</b> Jamf enters into appropriate data processing agreements with all sub-processors that include data protection obligations that offer at least the same protection of personal data that Jamf offers to its customers.</p>              |

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| Supplemental Organizational, Technical, and Contractual Security Measures | <b>Transfer to sub-processor:</b> Jamf enters into appropriate data processing agreements with all sub-processors that include data protection obligations that offer at least the same protection of personal data that Jamf offers to its customers. Sub-processors have been verified by Jamf's Information Security team to have sufficient technical and organizational security measures. |
| Jamf Policy for Law Enforcement Requests to Client Data                   | <b>Transfer to sub-processor:</b> Jamf ensures that the data processing agreements with its sub-processors have appropriate obligations with respect to law enforcement requests to enable Jamf to comply with Jamf's obligations to customers under our DPA.                                                                                                                                   |
| Length of processing chain                                                | <b>Transfer to sub-processor:</b> Data is transferred externally to our sub-processors.                                                                                                                                                                                                                                                                                                         |
| Applicable transfer mechanism                                             | <b>Transfer to sub-processor:</b> EEA SCCs, UK Addendum, and/or Swiss SCCs (as applicable) for onward transfers to our sub-processors.                                                                                                                                                                                                                                                          |

## Brazil

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| Purpose for transfer and any further processing | <b>Transfer to sub-processor:</b> Jamf uses AWS for our edge services to process data in Brazil as part of Jamf Security Cloud offerings, which have features included in Jamf Connect, Protect, Now, and Safe Internet. Data related to these products and features is then transferred to Ireland or the United States (hosting option for Jamf Safe Internet only) for storage and further processing. |
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|                                                                                                               | Please see our list of <a href="#">sub-processors</a> for specific information.                                                                                                                                                                                                                                                                                                                 |
| The frequency of the transfer                                                                                 | <b>Transfer to sub-processor:</b> Data is transferred continuously to AWS for customers in this region for their edge services.                                                                                                                                                                                                                                                                 |
| Categories of personal data transferred                                                                       | See Section B of Schedule 1 in Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> .                                                                                                                                                                                                                                                                                       |
| Sensitive data transferred                                                                                    | Sensitive or Special Category data categories may be processed here depending on a customer's use of Jamf's Product Offerings and enabled features. Please refer to <a href="#">Jamf's Customer DPA</a> for more information on specific Sensitive data categories.                                                                                                                             |
| Applied restrictions or safeguards that take into consideration the nature of the data and the risks involved | <b>Transfer to sub-processor:</b> Jamf enters into appropriate data processing agreements with all sub-processors that include data protection obligations that offer at least the same protection of personal data that Jamf offers to its customers.                                                                                                                                          |
| Supplemental Organizational, Technical, and Contractual Security Measures                                     | <b>Transfer to sub-processor:</b> Jamf enters into appropriate data processing agreements with all sub-processors that include data protection obligations that offer at least the same protection of personal data that Jamf offers to its customers. Sub-processors have been verified by Jamf's Information Security team to have sufficient technical and organizational security measures. |
| Jamf Policy for Law Enforcement Requests to Client Data                                                       | <b>Transfer to sub-processor:</b> Jamf ensures that the data processing agreements with its sub-processors have appropriate obligations with respect to law enforcement requests to                                                                                                                                                                                                             |

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|                               | enable Jamf to comply with Jamf's obligations to customers under our DPA.                                                              |
| Length of processing chain    | <b>Transfer to sub-processor:</b> Data is transferred externally to our sub-processors.                                                |
| Applicable transfer mechanism | <b>Transfer to sub-processor:</b> EEA SCCs, UK Addendum, and/or Swiss SCCs (as applicable) for onward transfers to our sub-processors. |

## Canada

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| Purpose for transfer and any further processing | <p><b>Transfer to sub-processor:</b> Jamf uses AWS for our edge services to process data in Canada as part of Jamf Security Cloud offerings, which have features included in Jamf Connect, Protect, Now, and Safe Internet. Data related to these products and features is then transferred to Ireland or the United States (hosting option for Jamf Safe Internet only) for storage and further processing.</p> <p>Please see our list of <a href="#">sub-processors</a> for specific information.</p> |
| The frequency of the transfer                   | <b>Transfer to sub-processor:</b> Data is transferred continuously to AWS for customers in this region for their edge services.                                                                                                                                                                                                                                                                                                                                                                         |
| Categories of personal data transferred         | See Section B of Schedule 1 in Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> .                                                                                                                                                                                                                                                                                                                                                                                               |
| Sensitive data transferred                      | Sensitive or Special Category data categories may be processed here depending on a customer's use of Jamf's Product Offerings and enabled features. Please refer to <a href="#">Jamf's</a>                                                                                                                                                                                                                                                                                                              |

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|                                                                                                               | <a href="#">Customer DPA</a> for more information on specific Sensitive data categories.                                                                                                                                                                                                                                                                                                        |
| Applied restrictions or safeguards that take into consideration the nature of the data and the risks involved | <b>Transfer to sub-processor:</b> Jamf enters into appropriate data processing agreements with all sub-processors that include data protection obligations that offer at least the same protection of personal data that Jamf offers to its customers.                                                                                                                                          |
| Supplemental Organizational, Technical, and Contractual Security Measures                                     | <b>Transfer to sub-processor:</b> Jamf enters into appropriate data processing agreements with all sub-processors that include data protection obligations that offer at least the same protection of personal data that Jamf offers to its customers. Sub-processors have been verified by Jamf's Information Security team to have sufficient technical and organizational security measures. |
| Jamf Policy for Law Enforcement Requests to Client Data                                                       | <b>Transfer to sub-processor:</b> Jamf ensures that the data processing agreements with its sub-processors have appropriate obligations with respect to law enforcement requests to enable Jamf to comply with Jamf's obligations to customers under our DPA.                                                                                                                                   |
| Length of processing chain                                                                                    | <b>Transfer to sub-processor:</b> Data is transferred externally to our sub-processors.                                                                                                                                                                                                                                                                                                         |
| Applicable transfer mechanism                                                                                 | <b>Transfer to sub-processor:</b> EEA SCCs, UK Addendum, and/or Swiss SCCs (as applicable) for onward transfers to our sub-processors.                                                                                                                                                                                                                                                          |

## Czechia

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| Purpose for transfer and any further processing | <b>Internal transfer:</b> Jamf has an office in Czechia, and employees there may need to |
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|                                                                                                               | process the customer's personal data for the purposes of security operations.                                                                                                                                                                                                                                |
| The frequency of the transfer                                                                                 | <b>Internal transfer:</b> Data is transferred as needed for security operations.                                                                                                                                                                                                                             |
| Categories of personal data transferred                                                                       | See Section B of Schedule 1 in Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> .                                                                                                                                                                                                    |
| Sensitive data transferred                                                                                    | Sensitive or Special Category data categories may be processed here depending on a customer's use of Jamf's Product Offerings and enabled features. Please refer to <a href="#">Jamf's Customer DPA</a> for more information on specific Sensitive data categories.                                          |
| Applied restrictions or safeguards that take into consideration the nature of the data and the risks involved | <b>Internal transfer:</b> Jamf's security measures for internal transfers are set forth in Schedule 3 of Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> and on Jamf's <a href="#">Security Portal</a> .                                                                            |
| Supplemental Organizational, Technical, and Contractual Security Measures                                     | <b>Internal transfer:</b> Jamf's security measures for internal transfers are set forth in Schedule 3 of Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> and on Jamf's <a href="#">Security Portal</a> .                                                                            |
| Jamf Policy for Law Enforcement Requests to Client Data                                                       | <b>Internal Transfer:</b> Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> compels us to notify our customer of requests unless explicitly prohibited from doing so by law. Please note that Jamf does not and cannot conduct real-time surveillance of customers. To date, Jamf has |

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|                               | not received a request from law enforcement for client data.                                                                                                                               |
| Length of processing chain    | <b>Internal transfer:</b> Data is transferred internally within Jamf.                                                                                                                      |
| Applicable transfer mechanism | <b>Internal transfer:</b> EEA SCCs, UK Addendum, and/or Swiss SCCs (as applicable), which are incorporated into Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> . |

## France

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| Purpose for transfer and any further processing                                                               | <b>Internal transfer:</b> Jamf has an office in France, and employees there may need to process the customer's personal data for the purposes of support.                                                                                                           |
| The frequency of the transfer                                                                                 | <b>Internal transfer:</b> Data is transferred as needed to provide support.                                                                                                                                                                                         |
| Categories of personal data transferred                                                                       | See Section B of Schedule 1 in Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> .                                                                                                                                                           |
| Sensitive data transferred                                                                                    | Sensitive or Special Category data categories may be processed here depending on a customer's use of Jamf's Product Offerings and enabled features. Please refer to <a href="#">Jamf's Customer DPA</a> for more information on specific Sensitive data categories. |
| Applied restrictions or safeguards that take into consideration the nature of the data and the risks involved | <b>Internal transfer:</b> Jamf's security measures for internal transfers are set forth in Schedule 3 of Jamf's <a href="#">Customer DPA located</a>                                                                                                                |

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|                                                                           | <p><a href="#">on Jamf's Legal Trust Center</a> and on Jamf's <a href="#">Security Portal</a>.</p> <p><b>Transfer to sub-processor:</b> Jamf enters into appropriate data processing agreements with all sub-processors that include data protection obligations that offer at least the same protection of personal data that Jamf offers to its customers.</p>                                                                                                                                                                                                                                                                               |
| Supplemental Organizational, Technical, and Contractual Security Measures | <p><b>Internal transfer:</b> Jamf's security measures for internal transfers are set forth in Schedule 3 of Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> and on Jamf's <a href="#">Security Portal</a>.</p> <p><b>Transfer to sub-processor:</b> Jamf enters into appropriate data processing agreements with all sub-processors that include data protection obligations that offer at least the same protection of personal data that Jamf offers to its customers. Sub-processors have been verified by Jamf's Information Security team to have sufficient technical and organizational security measures.</p> |
| Jamf Policy for Law Enforcement Requests to Client Data                   | <p><b>Internal Transfer:</b> Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> compels us to notify our customer of requests unless explicitly prohibited from doing so by law. Please note that Jamf does not and cannot conduct real-time surveillance of customers. To date, Jamf has not received a request from law enforcement for client data.</p> <p><b>Transfer to sub-processor:</b> Jamf ensures that the data processing agreements with its sub-processors have appropriate obligations with respect to law enforcement requests to</p>                                                                    |

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|                               | enable Jamf to comply with Jamf's obligations to customers under our DPA.                                                                                                                                                                                                                                                                      |
| Length of processing chain    | <b>Internal transfer:</b> Data is transferred internally within Jamf.                                                                                                                                                                                                                                                                          |
| Applicable transfer mechanism | <p><b>Internal transfer:</b> EEA SCCs, UK Addendum, and/or Swiss SCCs (as applicable), which are incorporated into Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a>.</p> <p><b>Transfer to sub-processor:</b> EEA SCCs, UK Addendum, and/or Swiss SCCs (as applicable) for onward transfers to our sub-processors.</p> |

## Germany

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| Purpose for transfer and any further processing | <p><b>Internal transfer:</b> Jamf has an office in Germany, and employees there may need to process the customer's personal data for the purposes of support or hosting services.</p> <p><b>Transfer to sub-processor:</b> Many of Jamf's Product Offerings use AWS to host services in Germany. Please see <a href="#">Jamf Cloud Hosting Locations</a> for more information. Customers may choose to have Jamf Pro hosted using Microsoft Azure in Germany when purchasing through the MS Azure Marketplace.</p> <p>Jamf uses AWS for our edge services to process data in Germany as part of Jamf Security Cloud offerings, which have features included in Jamf Connect, Protect, Now, and Safe Internet. Data related to these products and features is then transferred to Ireland or the United States</p> |
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|                                                                                                               | <p>(hosting option for Jamf Safe Internet only) for storage and further processing.</p> <p>Please see our list of <a href="#">sub-processors</a> for specific information.</p>                                                                                                                                                                                                                                                    |
| The frequency of the transfer                                                                                 | <p><b>Internal transfer:</b> Data is transferred as needed to provide support or hosting services.</p> <p><b>Transfer to sub-processor:</b> Data is transferred continuously to AWS for customers in this region for hosting and edge services.</p> <p>Data is transferred continuously to Microsoft Corporation for customers in this region for hosting.</p>                                                                    |
| Categories of personal data transferred                                                                       | <p>See Section B of Schedule 1 in Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a>.</p>                                                                                                                                                                                                                                                                                                                   |
| Sensitive data transferred                                                                                    | <p>Sensitive or Special Category data categories may be processed here depending on a customer's use of Jamf's Product Offerings and enabled features. Please refer to <a href="#">Jamf's Customer DPA</a> for more information on specific Sensitive data categories.</p>                                                                                                                                                        |
| Applied restrictions or safeguards that take into consideration the nature of the data and the risks involved | <p><b>Internal transfer:</b> Jamf's security measures for internal transfers are set forth in Schedule 3 of Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> and on Jamf's <a href="#">Security Portal</a>.</p> <p><b>Transfer to sub-processor:</b> Jamf enters into appropriate data processing agreements with all sub-processors that include data protection obligations that offer at least the</p> |

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|                                                                                  | <p>same protection of personal data that Jamf offers to its customers.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <p>Supplemental Organizational, Technical, and Contractual Security Measures</p> | <p><b>Internal transfer:</b> Jamf's security measures for internal transfers are set forth in Schedule 3 of Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> and on Jamf's <a href="#">Security Portal</a>.</p> <p><b>Transfer to sub-processor:</b> Jamf enters into appropriate data processing agreements with all sub-processors that include data protection obligations that offer at least the same protection of personal data that Jamf offers to its customers. Sub-processors have been verified by Jamf's Information Security team to have sufficient technical and organizational security measures.</p>        |
| <p>Jamf Policy for Law Enforcement Requests to Client Data</p>                   | <p><b>Internal Transfer:</b> Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> compels us to notify our customer of requests unless explicitly prohibited from doing so by law. Please note that Jamf does not and cannot conduct real-time surveillance of customers. To date, Jamf has not received a request from law enforcement for client data.</p> <p><b>Transfer to sub-processor:</b> Jamf ensures that the data processing agreements with its sub-processors have appropriate obligations with respect to law enforcement requests to enable Jamf to comply with Jamf's obligations to customers under our DPA.</p> |
| <p>Length of processing chain</p>                                                | <p><b>Internal transfer:</b> Data is transferred internally within Jamf.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |

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|                               | <b>Transfer to sub-processor:</b> Data is transferred externally to our sub-processors.                                                                                                                                                                                                                                                        |
| Applicable transfer mechanism | <p><b>Internal transfer:</b> EEA SCCs, UK Addendum, and/or Swiss SCCs (as applicable), which are incorporated into Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a>.</p> <p><b>Transfer to sub-processor:</b> EEA SCCs, UK Addendum, and/or Swiss SCCs (as applicable) for onward transfers to our sub-processors.</p> |

## Hong Kong

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| Purpose for transfer and any further processing | <p><b>Transfer to sub-processor:</b> Jamf uses AWS for our edge services to process data in Hong Kong as part of Jamf Security Cloud offerings, which have features included in Jamf Connect, Protect, Now, and Safe Internet. Data related to these products and features is then transferred to Ireland or the United States (hosting option for Jamf Safe Internet only) for storage and further processing.</p> <p>Please see our list of <a href="#">sub-processors</a> for specific information.</p> |
| The frequency of the transfer                   | <b>Transfer to sub-processor:</b> Data is transferred continuously to AWS for customers in this region for their edge service.                                                                                                                                                                                                                                                                                                                                                                             |
| Categories of personal data transferred         | See Section B of Schedule 1 in Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> .                                                                                                                                                                                                                                                                                                                                                                                                  |

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| Sensitive data transferred                                                                                    | Sensitive or Special Category data categories may be processed here depending on a customer's use of Jamf's Product Offerings and enabled features. Please refer to <a href="#">Jamf's Customer DPA</a> for more information on specific Sensitive data categories.                                                                                                                             |
| Applied restrictions or safeguards that take into consideration the nature of the data and the risks involved | <b>Transfer to sub-processor:</b> Jamf enters into appropriate data processing agreements with all sub-processors that include data protection obligations that offer at least the same protection of personal data that Jamf offers to its customers.                                                                                                                                          |
| Supplemental Organizational, Technical, and Contractual Security Measures                                     | <b>Transfer to sub-processor:</b> Jamf enters into appropriate data processing agreements with all sub-processors that include data protection obligations that offer at least the same protection of personal data that Jamf offers to its customers. Sub-processors have been verified by Jamf's Information Security team to have sufficient technical and organizational security measures. |
| Jamf Policy for Law Enforcement Requests to Client Data                                                       | <b>Transfer to sub-processor:</b> Jamf ensures that the data processing agreements with its sub-processors have appropriate obligations with respect to law enforcement requests to enable Jamf to comply with Jamf's obligations to customers under our DPA.                                                                                                                                   |
| Length of processing chain                                                                                    | <b>Transfer to sub-processor:</b> Data is transferred externally to our sub-processors.                                                                                                                                                                                                                                                                                                         |
| Applicable transfer mechanism                                                                                 | <b>Transfer to sub-processor:</b> EEA SCCs, UK Addendum, and/or Swiss SCCs (as applicable) for onward transfers to our sub-processors.                                                                                                                                                                                                                                                          |

## India

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| Purpose for transfer and any further processing | <p><b>Internal transfer:</b> Jamf has an office in India, and employees there may need to process the customer's personal data for the purpose of support.</p> <p><b>Transfer to sub-processor:</b> Jamf uses AWS for our edge services to process data in India as part of Jamf Security Cloud offerings, which have features included in Jamf Connect, Protect, Now, and Safe Internet. Data related to these products and features is then transferred to Ireland or the United States (hosting option for Jamf Safe Internet only) for storage and further processing.</p> <p>Please see our list of <a href="#">sub-processors</a> for specific information.</p> |
| The frequency of the transfer                   | <p><b>Internal transfer:</b> Data is transferred as needed to provide support.</p> <p><b>Transfer to sub-processor:</b> Data is transferred continuously to AWS for customers in this region for their edge service.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| Categories of personal data transferred         | <p>See Section B of Schedule 1 in Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a>.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Sensitive data transferred                      | <p>Sensitive or Special Category data categories may be processed here depending on a customer's use of Jamf's Product Offerings and enabled features. Please refer to <a href="#">Jamf's Customer DPA</a> for more information on specific Sensitive data categories.</p>                                                                                                                                                                                                                                                                                                                                                                                            |

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| <p>Applied restrictions or safeguards that take into consideration the nature of the data and the risks involved</p> | <p><b>Internal transfer:</b> Jamf's security measures for internal transfers are set forth in Schedule 3 of Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> and on Jamf's <a href="#">Security Portal</a>.</p> <p><b>Transfer to sub-processor:</b> Jamf enters into appropriate data processing agreements with all sub-processors that include data protection obligations that offer at least the same protection of personal data that Jamf offers to its customers.</p>                                                                                                                                          |
| <p>Supplemental Organizational, Technical, and Contractual Security Measures</p>                                     | <p><b>Internal transfer:</b> Jamf's security measures for internal transfers are set forth in Schedule 3 of Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> and on Jamf's <a href="#">Security Portal</a>.</p> <p><b>Transfer to sub-processor:</b> Jamf enters into appropriate data processing agreements with all sub-processors that include data protection obligations that offer at least the same protection of personal data that Jamf offers to its customers. Sub-processors have been verified by Jamf's Information Security team to have sufficient technical and organizational security measures.</p> |
| <p>Jamf Policy for Law Enforcement Requests to Client Data</p>                                                       | <p><b>Internal Transfer:</b> Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> compels us to notify our customer of requests unless explicitly prohibited from doing so by law. Please note that Jamf does not and cannot conduct real-time surveillance of customers. To date, Jamf has not received a request from law enforcement for client data.</p> <p><b>Transfer to sub-processor:</b> Jamf ensures that the data processing agreements with its sub-</p>                                                                                                                                                       |

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|                               | processors have appropriate obligations with respect to law enforcement requests to enable Jamf to comply with Jamf's obligations to customers under our DPA.                                                                                                                                                                                  |
| Length of processing chain    | <p><b>Internal transfer:</b> Data is transferred internally within Jamf.</p> <p><b>Transfer to sub-processor:</b> Data is transferred externally to our sub-processors.</p>                                                                                                                                                                    |
| Applicable transfer mechanism | <p><b>Internal transfer:</b> EEA SCCs, UK Addendum, and/or Swiss SCCs (as applicable), which are incorporated into Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a>.</p> <p><b>Transfer to sub-processor:</b> EEA SCCs, UK Addendum, and/or Swiss SCCs (as applicable) for onward transfers to our sub-processors.</p> |

## Ireland

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| Purpose for transfer and any further processing | <p><b>Transfer to sub-processor:</b> Many of Jamf's Product Offerings use AWS to host services in Ireland. Please see <a href="#">Jamf Cloud Hosting Locations</a> for more information.</p> <p>Jamf uses AWS for our edge services to process data in Ireland as part of Jamf Security Cloud offerings, which have features included in Jamf Connect, Protect, Now, and Safe Internet. Data related to these products and features is then transferred to Ireland or the United States (hosting option for Jamf Safe Internet only) for storage and further processing.</p> |
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|                                                                                                               | Please see our list of <a href="#">sub-processors</a> for specific information.                                                                                                                                                                                                                                                                                                                 |
| The frequency of the transfer                                                                                 | <b>Transfer to sub-processor:</b> Data is transferred continuously to AWS for customers in this region for hosting and edge services.                                                                                                                                                                                                                                                           |
| Categories of personal data transferred                                                                       | See Section B of Schedule 1 in Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> .                                                                                                                                                                                                                                                                                       |
| Sensitive data transferred                                                                                    | Sensitive or Special Category data categories may be processed here depending on a customer's use of Jamf's Product Offerings and enabled features. Please refer to <a href="#">Jamf's Customer DPA</a> for more information on specific Sensitive data categories.                                                                                                                             |
| Applied restrictions or safeguards that take into consideration the nature of the data and the risks involved | <b>Transfer to sub-processor:</b> Jamf enters into appropriate data processing agreements with all sub-processors that include data protection obligations that offer at least the same protection of personal data that Jamf offers to its customers.                                                                                                                                          |
| Supplemental Organizational, Technical, and Contractual Security Measures                                     | <b>Transfer to sub-processor:</b> Jamf enters into appropriate data processing agreements with all sub-processors that include data protection obligations that offer at least the same protection of personal data that Jamf offers to its customers. Sub-processors have been verified by Jamf's Information Security team to have sufficient technical and organizational security measures. |
| Jamf Policy for Law Enforcement Requests to Client Data                                                       | <b>Transfer to sub-processor:</b> Jamf ensures that the data processing agreements with its sub-                                                                                                                                                                                                                                                                                                |

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|                               | processors have appropriate obligations with respect to law enforcement requests to enable Jamf to comply with Jamf's obligations to customers under our DPA.                              |
| Length of processing chain    | <b>Transfer to sub-processor:</b> Data is transferred externally to our sub-processors.                                                                                                    |
| Applicable transfer mechanism | <b>Internal transfer:</b> EEA SCCs, UK Addendum, and/or Swiss SCCs (as applicable), which are incorporated into Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> . |

## Israel

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| Purpose for transfer and any further processing | <b>Internal transfer:</b> Jamf has an office in Israel, and employees there may need to process customer's personal data for the purposes of support.                                                                                                               |
| The frequency of the transfer                   | <b>Internal transfer:</b> Data is transferred as needed for support.                                                                                                                                                                                                |
| Categories of personal data transferred         | See Section B of Schedule 1 in Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> .                                                                                                                                                           |
| Sensitive data transferred                      | Sensitive or Special Category data categories may be processed here depending on a customer's use of Jamf's Product Offerings and enabled features. Please refer to <a href="#">Jamf's Customer DPA</a> for more information on specific Sensitive data categories. |

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| Applied restrictions or safeguards that take into consideration the nature of the data and the risks involved | <b>Internal transfer:</b> Jamf's security measures for internal transfers are set forth in Schedule 3 of Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> and on Jamf's <a href="#">Security Portal</a> .                                                                                                                                         |
| Supplemental Organizational, Technical, and Contractual Security Measures                                     | <b>Internal transfer:</b> Jamf's security measures for internal transfers are set forth in Schedule 3 of Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> and on Jamf's <a href="#">Security Portal</a> .                                                                                                                                         |
| Jamf Policy for Law Enforcement Requests to Client Data                                                       | <b>Internal Transfer:</b> Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> compels us to notify our customer of requests unless explicitly prohibited from doing so by law. Please note that Jamf does not and cannot conduct real-time surveillance of customers. To date, Jamf has not received a request from law enforcement for client data. |
| Length of processing chain                                                                                    | <b>Internal transfer:</b> Data is transferred internally within Jamf.                                                                                                                                                                                                                                                                                                     |
| Applicable transfer mechanism                                                                                 | <b>Internal transfer:</b> EEA SCCs, UK Addendum, and/or Swiss SCCs (as applicable), which are incorporated into Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> .                                                                                                                                                                                |

## Japan

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| Purpose for transfer and any further processing | <p><b>Internal transfer:</b> Jamf has an office in Japan, and employees there may need to process customer personal data for the purposes of support or cloud hosting.</p> <p><b>Transfer to sub-processor:</b> Many of Jamf's Product Offerings use AWS to host services in Japan. Please see <a href="#">Jamf Cloud Hosting Locations</a> for more information.</p> <p>Jamf uses AWS for our edge services to process data in Japan as part of Jamf Security Cloud offerings, which have features included in Jamf Connect, Protect, Now, and Safe Internet. Data related to these products and features is then transferred to Ireland or the United States (hosting option for Jamf Safe Internet only) for storage and further processing.</p> <p>Please see our list of <a href="#">sub-processors</a> for specific information.</p> |
| The frequency of the transfer                   | <p><b>Internal transfer:</b> Data is transferred as needed to provide support and hosting services.</p> <p><b>Transfer to sub-processor:</b> Data is transferred continuously to AWS for customers in this region for hosting and edge services.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Categories of personal data transferred         | See Section B of Schedule 1 of Jamf's <a href="#">DPA</a> .                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Sensitive data transferred                      | Sensitive or Special Category data categories may be processed here depending on a customer's use of Jamf's Product Offerings and enabled features. Please refer to <a href="#">Jamf's</a>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

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|                                                                                                                      | <p><a href="#">Customer DPA</a> for more information on specific Sensitive data categories.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <p>Applied restrictions or safeguards that take into consideration the nature of the data and the risks involved</p> | <p><b>Internal transfer:</b> Jamf's security measures for internal transfers are set forth in Schedule 3 of Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> and on Jamf's <a href="#">Security Portal</a>.</p> <p><b>Transfer to sub-processor:</b> Jamf enters into appropriate data processing agreements with all sub-processors that include data protection obligations that offer at least the same protection of personal data that Jamf offers to its customers.</p>                                                                                                                                          |
| <p>Supplemental Organizational, Technical, and Contractual Security Measures</p>                                     | <p><b>Internal transfer:</b> Jamf's security measures for internal transfers are set forth in Schedule 3 of Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> and on Jamf's <a href="#">Security Portal</a>.</p> <p><b>Transfer to sub-processor:</b> Jamf enters into appropriate data processing agreements with all sub-processors that include data protection obligations that offer at least the same protection of personal data that Jamf offers to its customers. Sub-processors have been verified by Jamf's Information Security team to have sufficient technical and organizational security measures.</p> |
| <p>Jamf Policy for Law Enforcement Requests to Client Data</p>                                                       | <p><b>Internal Transfer:</b> Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> compels us to notify our customer of requests unless explicitly prohibited from doing so by law. Please note that Jamf does not and cannot conduct real-time surveillance of customers. To date, Jamf has</p>                                                                                                                                                                                                                                                                                                                            |

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|                               | <p>not received a request from law enforcement for client data.</p> <p><b>Transfer to sub-processor:</b> Jamf ensures that the data processing agreements with its sub-processors have appropriate obligations with respect to law enforcement requests to enable Jamf to comply with Jamf's obligations to customers under our DPA.</p>       |
| Length of processing chain    | <p><b>Internal transfer:</b> Data is transferred internally within Jamf.</p> <p><b>Transfer to sub-processor:</b> Data is transferred externally to our sub-processor.</p>                                                                                                                                                                     |
| Applicable transfer mechanism | <p><b>Internal transfer:</b> EEA SCCs, UK Addendum, and/or Swiss SCCs (as applicable), which are incorporated into Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a>.</p> <p><b>Transfer to sub-processor:</b> EEA SCCs, UK Addendum, and/or Swiss SCCs (as applicable) for onward transfers to our sub-processors.</p> |

## Netherlands

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| Purpose for transfer and any further processing | <p><b>Internal transfer:</b> Jamf has an office in the Netherlands, and employees there may need to process customer personal data for the purposes of support.</p> |
| The frequency of the transfer                   | <p><b>Internal transfer:</b> Data is transferred as needed to provide support.</p>                                                                                  |
| Categories of personal data transferred         | <p>See Section B of Schedule 1 in Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust</a></p>                                                             |

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|                                                                                                               | <a href="#">Center</a> .                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Sensitive data transferred                                                                                    | Sensitive or Special Category data categories may be processed here depending on a customer's use of Jamf's Product Offerings and enabled features. Please refer to <a href="#">Jamf's Customer DPA</a> for more information on specific Sensitive data categories.                                                                                                                                                                                                                                                                                                                                                                            |
| Applied restrictions or safeguards that take into consideration the nature of the data and the risks involved | <p><b>Internal transfer:</b> Jamf's security measures for internal transfers are set forth in Schedule 3 of Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> and on Jamf's <a href="#">Security Portal</a>.</p> <p><b>Transfer to sub-processor:</b> Jamf enters into appropriate data processing agreements with all sub-processors that include data protection obligations that offer at least the same protection of personal data that Jamf offers to its customers.</p>                                                                                                                                          |
| Supplemental Organizational, Technical, and Contractual Security Measures                                     | <p><b>Internal transfer:</b> Jamf's security measures for internal transfers are set forth in Schedule 3 of Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> and on Jamf's <a href="#">Security Portal</a>.</p> <p><b>Transfer to sub-processor:</b> Jamf enters into appropriate data processing agreements with all sub-processors that include data protection obligations that offer at least the same protection of personal data that Jamf offers to its customers. Sub-processors have been verified by Jamf's Information Security team to have sufficient technical and organizational security measures.</p> |

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| Jamf Policy for Law Enforcement Requests to Client Data | <p><b>Internal Transfer:</b> Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> compels us to notify our customer of requests unless explicitly prohibited from doing so by law. Please note that Jamf does not and cannot conduct real-time surveillance of customers. To date, Jamf has not received a request from law enforcement for client data.</p> <p><b>Transfer to sub-processor:</b> Jamf ensures that the data processing agreements with its sub-processors have appropriate obligations with respect to law enforcement requests to enable Jamf to comply with Jamf's obligations to customers under our DPA.</p> |
| Length of processing chain                              | <p><b>Internal transfer:</b> Data is transferred internally within Jamf.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Applicable transfer mechanism                           | <p><b>Internal transfer:</b> EEA SCCs, UK Addendum, and/or Swiss SCCs (as applicable), which are incorporated into Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a>.</p> <p><b>Transfer to sub-processor:</b> EEA SCCs, UK Addendum, and/or Swiss SCCs (as applicable) for onward transfers to our sub-processors.</p>                                                                                                                                                                                                                                                                                                        |

## Poland

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| Purpose for transfer and any further processing | <p><b>Internal transfer:</b> Jamf has an office in Poland, and employees there may need to process the customer's personal data for the purposes of support, security operations, or hosting services.</p> |
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| The frequency of the transfer                                                                                 | <b>Internal transfer:</b> Data is transferred as needed for security support, security operations, or hosting services.                                                                                                                                                                                                                                                   |
| Categories of personal data transferred                                                                       | See Section B of Schedule 1 in Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> .                                                                                                                                                                                                                                                                 |
| Sensitive data transferred                                                                                    | Sensitive or Special Category data categories may be processed here depending on a customer's use of Jamf's Product Offerings and enabled features. Please refer to <a href="#">Jamf's Customer DPA</a> for more information on specific Sensitive data categories.                                                                                                       |
| Applied restrictions or safeguards that take into consideration the nature of the data and the risks involved | <b>Internal transfer:</b> Jamf's security measures for internal transfers are set forth in Schedule 3 of Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> and on Jamf's <a href="#">Security Portal</a> .                                                                                                                                         |
| Supplemental Organizational, Technical, and Contractual Security Measures                                     | <b>Internal transfer:</b> Jamf's security measures for internal transfers are set forth in Schedule 3 of Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> and on Jamf's <a href="#">Security Portal</a> .                                                                                                                                         |
| Jamf Policy for Law Enforcement Requests to Client Data                                                       | <b>Internal Transfer:</b> Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> compels us to notify our customer of requests unless explicitly prohibited from doing so by law. Please note that Jamf does not and cannot conduct real-time surveillance of customers. To date, Jamf has not received a request from law enforcement for client data. |

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| Length of processing chain    | <b>Internal transfer:</b> Data is transferred internally within Jamf.                                                                                                                      |
| Applicable transfer mechanism | <b>Internal transfer:</b> EEA SCCs, UK Addendum, and/or Swiss SCCs (as applicable), which are incorporated into Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> . |

## Singapore

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| Purpose for transfer and any further processing | <p><b>Transfer to sub-processor:</b> Jamf uses AWS for our edge services to process data in Singapore as part of Jamf Security Cloud offerings, which have features included in Jamf Connect, Protect, Now, and Safe Internet. Data related to these products and features is then transferred to Ireland or the United States (hosting option for Jamf Safe Internet only) for storage and further processing.</p> <p>Please see our list of <a href="#">sub-processors</a> for specific information.</p> |
| The frequency of the transfer                   | <b>Transfer to sub-processor:</b> Data is transferred continuously to AWS for customers in this region for their edge services.                                                                                                                                                                                                                                                                                                                                                                            |
| Categories of personal data transferred         | See Section B of Schedule 1 in Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> .                                                                                                                                                                                                                                                                                                                                                                                                  |
| Sensitive data transferred                      | Sensitive or Special Category data categories may be processed here depending on a customer's use of Jamf's Product Offerings                                                                                                                                                                                                                                                                                                                                                                              |

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|                                                                                                               | and enabled features. Please refer to <a href="#">Jamf's Customer DPA</a> for more information on specific Sensitive data categories.                                                                                                                                                                                                                                                           |
| Applied restrictions or safeguards that take into consideration the nature of the data and the risks involved | <b>Transfer to sub-processor:</b> Jamf enters into appropriate data processing agreements with all sub-processors that include data protection obligations that offer at least the same protection of personal data that Jamf offers to its customers.                                                                                                                                          |
| Supplemental Organizational, Technical, and Contractual Security Measures                                     | <b>Transfer to sub-processor:</b> Jamf enters into appropriate data processing agreements with all sub-processors that include data protection obligations that offer at least the same protection of personal data that Jamf offers to its customers. Sub-processors have been verified by Jamf's Information Security team to have sufficient technical and organizational security measures. |
| Jamf Policy for Law Enforcement Requests to Client Data                                                       | <b>Transfer to sub-processor:</b> Jamf ensures that the data processing agreements with its sub-processors have appropriate obligations with respect to law enforcement requests to enable Jamf to comply with Jamf's obligations to customers under our DPA.                                                                                                                                   |
| Length of processing chain                                                                                    | <b>Transfer to sub-processor:</b> Data is transferred externally to our sub-processors.                                                                                                                                                                                                                                                                                                         |
| Applicable transfer mechanism                                                                                 | <b>Transfer to sub-processor:</b> EEA SCCs, UK Addendum, and/or Swiss SCCs (as applicable) for onward transfers to our sub-processors.                                                                                                                                                                                                                                                          |

## South Africa

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| Purpose for transfer and any further processing                                                               | <p><b>Transfer to sub-processor:</b> Jamf uses AWS for our edge services to process data in South Africa as part of Jamf Security Cloud offerings, which have features included in Jamf Connect, Protect, Now, and Safe Internet. Data related to these products and features is then transferred to Ireland or the United States (hosting option for Jamf Safe Internet only) for storage and further processing.</p> <p>Please see our list of <a href="#">sub-processors</a> for specific information.</p> |
| The frequency of the transfer                                                                                 | <p><b>Transfer to sub-processor:</b> Data is transferred continuously to AWS for customers in this region for their edge services.</p>                                                                                                                                                                                                                                                                                                                                                                        |
| Categories of personal data transferred                                                                       | <p>See Section B of Schedule 1 in Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a>.</p>                                                                                                                                                                                                                                                                                                                                                                                               |
| Sensitive data transferred                                                                                    | <p>Sensitive or Special Category data categories may be processed here depending on a customer's use of Jamf's Product Offerings and enabled features. Please refer to <a href="#">Jamf's Customer DPA</a> for more information on specific Sensitive data categories.</p>                                                                                                                                                                                                                                    |
| Applied restrictions or safeguards that take into consideration the nature of the data and the risks involved | <p><b>Transfer to sub-processor:</b> Jamf enters into appropriate data processing agreements with all sub-processors that include data protection obligations that offer at least the same protection of personal data that Jamf offers to its customers.</p>                                                                                                                                                                                                                                                 |

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| Supplemental Organizational, Technical, and Contractual Security Measures | <b>Transfer to sub-processor:</b> Jamf enters into appropriate data processing agreements with all sub-processors that include data protection obligations that offer at least the same protection of personal data that Jamf offers to its customers. Sub-processors have been verified by Jamf's Information Security team to have sufficient technical and organizational security measures. |
| Jamf Policy for Law Enforcement Requests to Client Data                   | <b>Transfer to sub-processor:</b> Jamf ensures that the data processing agreements with its sub-processors have appropriate obligations with respect to law enforcement requests to enable Jamf to comply with Jamf's obligations to customers under our DPA.                                                                                                                                   |
| Length of processing chain                                                | <b>Transfer to sub-processor:</b> Data is transferred externally to our sub-processors.                                                                                                                                                                                                                                                                                                         |
| Applicable transfer mechanism                                             | <b>Transfer to sub-processor:</b> EEA SCCs, UK Addendum, and/or Swiss SCCs (as applicable) for onward transfers to our sub-processors.                                                                                                                                                                                                                                                          |

## Sweden

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| Purpose for transfer and any further processing | <p><b>Internal transfer:</b> Jamf has an office in Sweden, and employees there may need to process customer's personal data for the purposes of support.</p> <p><b>Transfer to sub-processor:</b> Many of Jamf's Product Offerings use AWS to host services in Sweden. Please <a href="#">see Jamf Cloud Hosting Locations</a> for more information.</p> <p>Please see our list of <a href="#">sub-processors</a> for specific information.</p> |
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| The frequency of the transfer                                                                                 | <p><b>Internal transfer:</b> Data is transferred as needed to provide support.</p> <p><b>Transfer to sub-processor:</b> Data is transferred continuously to AWS for customers in this region for hosting.</p>                                                                                                                                                                                                                                                                                         |
| Categories of personal data transferred                                                                       | See Section B of Schedule 1 in Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> .                                                                                                                                                                                                                                                                                                                                                                                             |
| Sensitive data transferred                                                                                    | Sensitive or Special Category data categories may be processed here depending on a customer's use of Jamf's Product Offerings and enabled features. Please refer to <a href="#">Jamf's Customer DPA</a> for more information on specific Sensitive data categories.                                                                                                                                                                                                                                   |
| Applied restrictions or safeguards that take into consideration the nature of the data and the risks involved | <p><b>Internal transfer:</b> Jamf's security measures for internal transfers are set forth in Schedule 3 of Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> and on Jamf's <a href="#">Security Portal</a>.</p> <p><b>Transfer to sub-processor:</b> Jamf enters into appropriate data processing agreements with all sub-processors that include data protection obligations that offer at least the same protection of personal data that Jamf offers to its customers.</p> |
| Supplemental Organizational, Technical, and Contractual Security Measures                                     | <p><b>Internal transfer:</b> Jamf's security measures for internal transfers are set forth in Schedule 3 of Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> and on Jamf's <a href="#">Security Portal</a>.</p> <p><b>Transfer to sub-processor:</b> Jamf enters into appropriate data processing agreements with all sub-processors that include data</p>                                                                                                                    |

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|                                                         | <p>protection obligations that offer at least the same protection of personal data that Jamf offers to its customers. Sub-processors have been verified by Jamf's Information Security team to have sufficient technical and organizational security measures.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Jamf Policy for Law Enforcement Requests to Client Data | <p><b>Internal Transfer:</b> Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> compels us to notify our customer of requests unless explicitly prohibited from doing so by law. Please note that Jamf does not and cannot conduct real-time surveillance of customers. To date, Jamf has not received a request from law enforcement for client data.</p> <p><b>Transfer to sub-processor:</b> Jamf ensures that the data processing agreements with its sub-processors have appropriate obligations with respect to law enforcement requests to enable Jamf to comply with Jamf's obligations to customers under our <a href="#">Customer DPA located on Jamf's Legal Trust Center</a>.</p> |
| Length of processing chain                              | <p><b>Internal transfer:</b> Data is transferred internally within Jamf.</p> <p><b>Transfer to sub-processor:</b> Data is transferred externally to our sub-processor.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Applicable transfer mechanism                           | <p><b>Internal transfer:</b> EEA SCCs, UK Addendum and/or Swiss SCCs, which are incorporated into Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a>.</p> <p><b>Transfer to sub-processor:</b> EEA SCCs, UK Addendum, and/or Swiss SCCs (as applicable) for onward transfers to our sub-</p>                                                                                                                                                                                                                                                                                                                                                                                                  |

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## Taiwan

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| Purpose for transfer and any further processing                                                               | <b>Internal transfer:</b> Jamf has an office in Taiwan, and employees there may need to process the customer's personal data for the purposes of support.                                                                                                           |
| The frequency of the transfer                                                                                 | <b>Internal transfer:</b> Data is transferred as needed to provide support.                                                                                                                                                                                         |
| Categories of personal data transferred                                                                       | See Section B of Schedule 1 in Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> .                                                                                                                                                           |
| Sensitive data transferred                                                                                    | Sensitive or Special Category data categories may be processed here depending on a customer's use of Jamf's Product Offerings and enabled features. Please refer to <a href="#">Jamf's Customer DPA</a> for more information on specific Sensitive data categories. |
| Applied restrictions or safeguards that take into consideration the nature of the data and the risks involved | <b>Internal transfer:</b> Jamf's security measures for internal transfers are set forth in Schedule 3 of Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> and on Jamf's <a href="#">Security Portal</a> .                                   |
| Supplemental Organizational, Technical, and Contractual Security Measures                                     | <b>Internal transfer:</b> Jamf's security measures for internal transfers are set forth in Schedule 3 of Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> and on Jamf's <a href="#">Security Portal</a> .                                   |

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| Jamf Policy for Law Enforcement Requests to Client Data | <b>Internal Transfer:</b> Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> compels us to notify our customer of requests unless explicitly prohibited from doing so by law. Please note that Jamf does not and cannot conduct real-time surveillance of customers. To date, Jamf has not received a request from law enforcement for client data. |
| Length of processing chain                              | <b>Internal transfer:</b> Data is transferred internally within Jamf.                                                                                                                                                                                                                                                                                                     |
| Applicable transfer mechanism                           | <b>Internal transfer:</b> EEA SCCs, UK Addendum, and/or Swiss SCCs (as applicable), which are incorporated into Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> .                                                                                                                                                                                |

## United Kingdom

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| Purpose for transfer and any further processing | <p><b>Internal transfer:</b> Jamf has an office in the United Kingdom, and employees there may need to process customer's personal data for the purposes of support or hosting services.</p> <p><b>Transfer to sub-processor:</b> Many of Jamf's Product Offerings use AWS to host services in the United Kingdom. Please <a href="#">see Jamf Cloud Hosting Locations</a> for more information.</p> <p>Jamf uses AWS for our edge services to process data in the United Kingdom as part of Jamf Security Cloud offerings, which have features included in Jamf Connect, Protect, Now, and Safe Internet. Data</p> |
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|                                                                                                               | <p>related to these products and features is then transferred to Ireland or the United States (hosting option for Jamf Safe Internet only) for storage and further processing.</p> <p>Please see our list of <a href="#">sub-processors</a> for specific information.</p>                                                                                                                                                                                                    |
| The frequency of the transfer                                                                                 | <p><b>Internal transfer:</b> Data is transferred as needed to provide support or hosting services.</p> <p><b>Transfer to sub-processor:</b> Data is transferred continuously to AWS for customers in this region for hosting or edge services.</p>                                                                                                                                                                                                                           |
| Categories of personal data transferred                                                                       | <p>See Section B of Schedule 1 in Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a>.</p>                                                                                                                                                                                                                                                                                                                                                              |
| Sensitive data transferred                                                                                    | <p>Sensitive or Special Category data categories may be processed here depending on a customer's use of Jamf's Product Offerings and enabled features. Please refer to <a href="#">Jamf's Customer DPA</a> for more information on specific Sensitive data categories.</p>                                                                                                                                                                                                   |
| Applied restrictions or safeguards that take into consideration the nature of the data and the risks involved | <p><b>Internal transfer:</b> Jamf's security measures for internal transfers are set forth in Schedule 3 of Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> and on Jamf's <a href="#">Security Portal</a>.</p> <p><b>Transfer to sub-processor:</b> Jamf enters into appropriate data processing agreements with all sub-processors that include data protection obligations that offer at least the same protection of personal data that Jamf</p> |

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|                                                                           | offers to its customers.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| Supplemental Organizational, Technical, and Contractual Security Measures | <p><b>Internal transfer:</b> Jamf's security measures for internal transfers are set forth in Schedule 3 of Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> and on Jamf's <a href="#">Security Portal</a>.</p> <p><b>Transfer to sub-processor:</b> Jamf enters into appropriate data processing agreements with all sub-processors that include data protection obligations that offer at least the same protection of personal data that Jamf offers to its customers. Sub-processors have been verified by Jamf's Information Security team to have sufficient technical and organizational security measures.</p>        |
| Jamf Policy for Law Enforcement Requests to Client Data                   | <p><b>Internal Transfer:</b> Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> compels us to notify our customer of requests unless explicitly prohibited from doing so by law. Please note that Jamf does not and cannot conduct real-time surveillance of customers. To date, Jamf has not received a request from law enforcement for client data.</p> <p><b>Transfer to sub-processor:</b> Jamf ensures that the data processing agreements with its sub-processors have appropriate obligations with respect to law enforcement requests to enable Jamf to comply with Jamf's obligations to customers under our DPA.</p> |
| Length of processing chain                                                | <p><b>Internal transfer:</b> Data is transferred internally within Jamf.</p> <p><b>Transfer to sub-processor:</b> Data is transferred externally to our sub-processor.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

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| Applicable transfer mechanism | <p><b>Internal transfer:</b> EEA SCCs, UK Addendum and/or Swiss SCCs, which are incorporated into Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a>.</p> <p><b>Transfer to sub-processor:</b> EEA SCCs, UK Addendum and/or Swiss SCCs for onward transfer to our sub-processor.</p> |
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## United States

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| Purpose for transfer and any further processing | <p><b>Internal transfer:</b> Jamf's headquarters and many offices are located in the United States, and employees there may need to process customer personal data for the purposes of support, security operations, or hosting services.</p> <p><b>Transfer to sub-processor:</b> Many of Jamf's Product Offerings use AWS to host services in the United States. Please <a href="#">see Jamf Cloud Hosting Locations</a> for more information.</p> <p>Jamf Pro may use Microsoft Corporation to host data in the United States for customers purchasing through the MS Azure Marketplace.</p> <p>Jamf Manager for Android and Mobile Forensics use Google Cloud Platform to host the service in the United States.</p> <p>Jamf uses AWS for our edge services to process data in the United States as part of Jamf Security Cloud offerings, which have features included in Jamf Connect, Protect, Now, and Safe Internet. Data related to these products and features is then transferred to Ireland or the United States</p> |
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|                                                                                                               | <p>(hosting option for Jamf Safe Internet only) for storage and further processing.</p> <p>Please see our list of <a href="#">sub-processors</a> for specific information.</p>                                                                                                                                                                                                                                                                                               |
| The frequency of the transfer                                                                                 | <p><b>Internal transfer:</b> Data is transferred as needed to provide support, security operations, or hosting services.</p> <p><b>Transfer to sub-processor:</b> Data is transferred continuously to AWS, Google Cloud Platform, and Microsoft Azure for customers in this region for hosting or edge services.</p>                                                                                                                                                         |
| Categories of personal data transferred                                                                       | <p>See Section B of Schedule 1 in Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a>.</p>                                                                                                                                                                                                                                                                                                                                                              |
| Sensitive data transferred                                                                                    | <p>Sensitive or Special Category data categories may be processed here depending on a customer's use of Jamf's Product Offerings and enabled features. Please refer to <a href="#">Jamf's Customer DPA</a> for more information on specific Sensitive data categories.</p>                                                                                                                                                                                                   |
| Applied restrictions or safeguards that take into consideration the nature of the data and the risks involved | <p><b>Internal transfer:</b> Jamf's security measures for internal transfers are set forth in Schedule 3 of Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> and on Jamf's <a href="#">Security Portal</a>.</p> <p><b>Transfer to sub-processor:</b> Jamf enters into appropriate data processing agreements with all sub-processors that include data protection obligations that offer at least the same protection of personal data that Jamf</p> |

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| Supplemental Organizational, Technical, and Contractual Security Measures | <p><b>Internal transfer:</b> Jamf's security measures for internal transfers are set forth in Schedule 3 of Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> and on Jamf's <a href="#">Security Portal</a>.</p> <p><b>Transfer to sub-processor:</b> Jamf enters into appropriate data processing agreements with all sub-processors that include data protection obligations that offer at least the same protection of personal data that Jamf offers to its customers. Sub-processors have been verified by Jamf's Information Security team to have sufficient technical and organizational security measures.</p>        |
| Jamf Policy for Law Enforcement Requests to Client Data                   | <p><b>Internal Transfer:</b> Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a> compels us to notify our customer of requests unless explicitly prohibited from doing so by law. Please note that Jamf does not and cannot conduct real-time surveillance of customers. To date, Jamf has not received a request from law enforcement for client data.</p> <p><b>Transfer to sub-processor:</b> Jamf ensures that the data processing agreements with its sub-processors have appropriate obligations with respect to law enforcement requests to enable Jamf to comply with Jamf's obligations to customers under our DPA.</p> |

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| Length of processing chain    | <p><b>Internal transfer:</b> Data is transferred internally within Jamf.</p> <p><b>Transfer to sub-processor:</b> Data is transferred externally to our sub-processor.</p>                                                                                                                                                                                                |
| Applicable transfer mechanism | <p><b>Internal transfer:</b> To the extent applicable, the EEA SCCs, UK Addendum and/or Swiss SCCs, which are incorporated into Jamf's <a href="#">Customer DPA located on Jamf's Legal Trust Center</a>.</p> <p><b>Transfer to sub-processor:</b> To the extent applicable, the EEA SCCs, UK Addendum, and/or Swiss SCCs for onward transfers to our sub-processors.</p> |