

DPA Template — Vedlegg B / Annex B: Sub-Processors for Bilko Archive Feature

△ **DRAFT** — pending final legal sign-off and translations (per Lexicon notes). MC #100045. 2026-05-08. Canonical-facts verified by John post-Lexicon (org.nr 932 516 136, Azure Sweden Central).

Annex B: Sub-Processors for Bilko Archive Feature

This annex applies specifically to the Bilko product when the archive feature is enabled.

B.1 Cloudflare R2 (Temporary Document Storage)

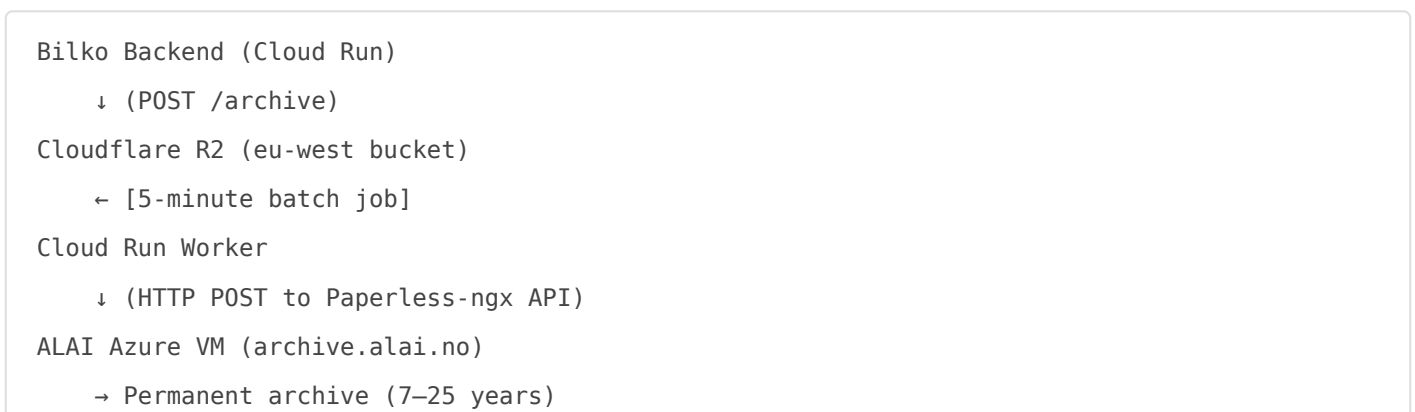
Field	Details
Sub-processor	Cloudflare, Inc.
Address	101 Townsend St, San Francisco, CA 94107, USA
Contact	privacyquestions@cloudflare.com
Purpose	Temporary staging of documents for archive pipeline
Data Categories Processed	Contracts (PDF), Invoices (PDF), Care Plans, Incident Reports, Onboarding Documents
Categories of Data Subjects	Bilko organization's customers, suppliers, patients (for care organizations)
Geographic Location	EU region (eu-west R2 storage bucket)
Processing Duration	Temporary (typically < 5 minutes; documents deleted after successful transfer to Paperless-ngx)
Safeguards	EU Standard Contractual Clauses (SCC 2021/914/EU) per Cloudflare's published DPA; AES-256 encryption at rest; TLS 1.3 in transit; Cloudflare Zero Trust architecture

Field	Details
Sub-sub-processors	See Cloudflare's DPA for complete list (https://www.cloudflare.com/cloudflare-customer-dpa/)

B.2 ALAI Azure VM Paperless-ngx (Long-Term Archive)

Field	Details
Sub-processor	ALAI Holding AS (own infrastructure)
Org.No	932 516 136
Address	Tømmerrenna 1B, 2050 Jessheim, Norway
Contact	dpa@alai.no
Purpose	Long-term archive of business documents at archive.alai.no
Data Categories Processed	Same as Cloudflare R2 above
Categories of Data Subjects	Same as Cloudflare R2 above
Geographic Location	EU/EEA (Microsoft Azure Sweden Central region)
Processing Duration	Permanent archive per retention schedule: <ul style="list-style-type: none"> • Financial documents: 7 years (accounting law RS/BA/HR) • Care documents: 25 years (UK NHS standard, interim)
Safeguards	ALAI DPA + Microsoft Azure Standard Contractual Clauses; Azure Disk Encryption (AES-256); TLS 1.3 in transit; Role-Based Access Control (RBAC); Paperless-ngx with OAuth2 authentication; Daily Azure backup with 30-day retention; Immutable audit trail in PostgreSQL
Sub-sub-processors	Microsoft Azure (infrastructure provider — see Microsoft Customer Agreement + DPA)

B.3 Data Flow for Archival



B.4 Notice of Sub-Processor Changes

ALAI Holding AS commits to notifying the Data Controller **at least 30 days in advance** via email before:

- New sub-processors are added to the archive pipeline
- Existing sub-processors are replaced
- Geographic location of processing changes

The Data Controller may object within this period if the new sub-processor does not meet data protection requirements.

Company: ALAI Holding AS (org.nr 932 516 136)

DPA Contact: dpa@alai.no

Revision #2

Created 2026-05-08 20:07:00 UTC by John

Updated 2026-06-14 20:02:48 UTC by John