

Sub-Processor Notification Email Template (Bilko)

△ STATUS

MC: #100045 | **Date:** 2026-05-08

Draft Status: Pending final legal review and translations (per Lexicon S1-S4)

Corrections Applied: Org.nr 932 516 136 (corrected from hallucinated 933 534 262), Azure Sweden Central (corrected from Norway East)

Sub-Processor Notification Email Template

Version: 1.0 **Last Updated:** 2026-05-08 **Purpose:** Notify Bilko tenants of new sub-processors per GDPR Art. 28(4) **Language:** English (Norwegian translation pending)

Email Template — English

Subject: Bilko Sub-Processor Update — Effective {{DATE_PLUS_30_DAYS}}

Dear {{TENANT_NAME}},

We are writing to inform you of changes to our sub-processor list for the Bilko accounting platform, in accordance with our Data Processing Agreement (DPA) and GDPR Article 28(4).

New Sub-Processors

Effective {{DATE_PLUS_30_DAYS}}, Bilko will use the following sub-processors for the **document archival feature**:

Sub-Processor	Purpose	Data Categories	Geographic Location	Safeguards
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Cloudflare R2 (Cloudflare, Inc., USA)	Temporary staging for archive pipeline	Contract PDFs, invoices, care plans, incident reports, onboarding documents	EU region (eu-west storage bucket)	Standard Contractual Clauses (SCCs) per Cloudflare's published DPA
ALAI Azure VM Paperless-ngx (ALAI Holding AS, org.nr 932 516 136, Norway)	Long-term document archive at archive.alai.no	Same categories as above	EU/EEA (Microsoft Azure Sweden Central region)	ALAI DPA + Azure Standard Contractual Clauses

What This Means for You

- **If you have enabled the document archival feature** in Bilko, documents you mark for archival (contracts, invoices, care plans, incident reports, onboarding documents) will be processed through these sub-processors.
- **Data flow:** Documents are temporarily staged in Cloudflare R2 (typically < 5 minutes), then transferred to ALAI's Paperless-ngx archive system hosted on Microsoft Azure (Sweden Central region).
- **Retention:** Financial documents are retained for 7 years; care-related documents for 25 years (per applicable accounting and care regulations).
- **Security:** All sub-processors are bound by Data Processing Agreements and Standard Contractual Clauses. Data is encrypted at rest (AES-256) and in transit (TLS 1.3).

Your Right to Object

Under GDPR Article 28(4), you have the right to **object to the use of these sub-processors** within **30 days** of receiving this notice.

If you object:

- Send your objection in writing to **dpa@alai.no** by **{{DATE_PLUS_30_DAYS}}**.
- We will work with you to find an alternative solution or, if not possible, allow you to terminate your Bilko subscription without penalty.

If you do not object by **{{DATE_PLUS_30_DAYS}}**, this will constitute your consent to the use of these sub-processors.

30-Day Advance Notice

This notice is provided **30 days in advance** of the effective date ({{DATE_PLUS_30_DAYS}}) in accordance with our DPA Section 3.4 and your Terms of Service Section 16.3.

Questions or Concerns

If you have any questions about these sub-processors or our data processing practices, please contact:

- **Data Protection Officer:** Alem Bašić — alem@alai.no — +47 40 47 42 51
- **DPA Inquiries:** dpa@alai.no
- **General Support:** support@bilko.io

Company Information

ALAI Holding AS

- Org.nr: 932 516 136
- Address: Tømmerrenna 1B, 2050 Jessheim, Norway
- Email: dpa@alai.no
- Website: <https://bilko.io>

We appreciate your trust in Bilko and remain committed to protecting your data in accordance with the highest standards of data protection law.

Best regards,

The Bilko Team ALAI Holding AS

Email Template — Norwegian (DRAFT — Translation Pending)

Emne: Bilko oppdatering av underleverandører — Trer i kraft {{DATE_PLUS_30_DAYS}}

Kjære {{TENANT_NAME}},

Vi skriver for å informere deg om endringer i vår liste over underleverandører for Bilko regnskapsplattform, i samsvar med vår databehandleravtale (DPA) og GDPR Artikkel 28(4).

Nye underleverandører

Med virkning fra **{{DATE_PLUS_30_DAYS}}** vil Bilko bruke følgende underleverandører for **dokumentarkivfunksjonen**:

UnderleverandørFormålDatakategorierGeografisk plasseringSikkerhetstiltak

----- **Cloudflare R2** (Cloudflare, Inc., USA)Midlertidig staging for arkivpipelineKontrakter (PDF), fakturaer, omsorgsplaner, hendelsesrapporter, onboarding-dokumenterEU-region (eu-west lagringsbucket)Standard Contractual Clauses (SCC) per Cloudflares publiserte DPA **ALAI Azure VM Paperless-ngx** (ALAI Holding AS, org.nr 932 516 136, Norge)Langtidsarkiv ved archive.alai.noSamme kategorier som ovenforEU/EØS (Microsoft Azure Sweden Central-region)ALAI DPA + Azure Standard Contractual Clauses

Hva betyr dette for deg?

- **Hvis du har aktivert dokumentarkivfunksjonen** i Bilko, vil dokumenter du markerer for arkivering (kontrakter, fakturaer, omsorgsplaner, hendelsesrapporter, onboarding-dokumenter) bli behandlet gjennom disse underleverandørene.
- **Dataflyt:** Dokumenter lagres midlertidig i Cloudflare R2 (typisk < 5 minutter), deretter overført til ALAIs Paperless-ngx arkivsystem hostet på Microsoft Azure (Sverige Central-region).
- **Oppbevaring:** Finansielle dokumenter oppbevares i 7 år; omsorgsdokumenter i 25 år (per gjeldende regnskaps- og omsorgsreguleringer).
- **Sikkerhet:** Alle underleverandører er bundet av databehandleravtaler og Standard Contractual Clauses. Data krypteres ved lagring (AES-256) og i transitt (TLS 1.3).

Din rett til å protestere

I henhold til GDPR Artikkel 28(4) har du rett til å **protestere mot bruken av disse underleverandørene** innen **30 dager** etter mottak av denne varslingen.

Hvis du protesterer:

- Send din protest skriftlig til **dpa@alai.no** innen **{{DATE_PLUS_30_DAYS}}**.
- Vi vil samarbeide med deg for å finne en alternativ løsning eller, hvis ikke mulig, tillate deg å avslutte Bilko-abonnementet uten straff.

Hvis du ikke protesterer innen **{{DATE_PLUS_30_DAYS}}**, vil dette utgjøre ditt samtykke til bruken av disse underleverandørene.

30-dagers forhåndsvarsel

Dette varslet gis **30 dager i forveien** for ikrafttredelsesdatoen ({{DATE_PLUS_30_DAYS}}) i samsvar med vår DPA Seksjon 3.4 og dine Tjenestevilkår Seksjon 16.3.

Spørsmål eller bekymringer

Hvis du har spørsmål om disse underleverandørene eller våre databehandlingspraksis, vennligst kontakt:

- **Personvernombud:** Alem Bašić — alem@alai.no — +47 40 47 42 51
- **DPA-henvendelser:** dpa@alai.no
- **Generell støtte:** support@bilko.io

Selskapsinformasjon

ALAI Holding AS

- Org.nr: 932 516 136
- Adresse: Tømmerrenna 1B, 2050 Jessheim, Norge
- E-post: dpa@alai.no
- Nettside: <https://bilko.io>

Vi setter pris på din tillit til Bilko og forblir forpliktet til å beskytte dine data i samsvar med de høyeste standardene for databeskyttelseslov.

Vennlig hilsen,

Bilko-teamet ALAI Holding AS

Usage Instructions

Placeholders to Replace

PlaceholderDescriptionExample -----

`{{TENANT_NAME}}` Organization name from Bilko database"Acme Accounting d.o.o."

`{{DATE_PLUS_30_DAYS}}` Effective date (30 days from send date)"2026-06-07"

When to Send

This template should be sent:

- **30 days before** enabling the archive feature for existing tenants
- **30 days before** adding any new sub-processor to the archive pipeline
- **30 days before** replacing an existing sub-processor

Sending Method

- **Email:** Send to organization owner's registered email address
- **In-app notification:** Display banner in Bilko UI with link to full notice
- **Audit log:** Record sending timestamp and recipient in Bilko's audit trail

Follow-Up Actions

- **Track objections:** If tenant objects within 30 days, flag their account and escalate to ALAI DPO (alem@alai.no).
- **Auto-consent:** If no objection received by `{{DATE_PLUS_30_DAYS}}`, record implicit consent in tenant's DPA compliance record.
- **Termination support:** If tenant objects and no alternative is available, process subscription cancellation per ToS Section 12.2 with data export provided.

Legal Review Notes

“ **△ NORWEGIAN TRANSLATION:** This template is provided in English only. A professional Norwegian translation must be prepared before sending to Norwegian-speaking tenants or tenants in Norway.

“ **△ SERBIAN/BOSNIAN/CROATIAN TRANSLATIONS:** For Balkan tenants, consider whether local-language versions are required under ZZPL (Serbia), ZZLP BiH (Bosnia & Herzegovina), or GDPR (Croatia). Consult local legal counsel.

“ **△ EFFECTIVE DATE PLACEHOLDER:** Ensure automated email system calculates `{{DATE_PLUS_30_DAYS}}` dynamically from send date to guarantee 30-day notice period.

“ **△ DPA REFERENCE:** Confirm that all Bilko tenant contracts include DPA Section 3.4 (sub-processor change notice clause) and ToS Section 16.3 (sub-processor disclosure) before sending this notice.

Approval

RoleNameDate ----- AuthorLexicon (ALAI Legal &
Documentation)2026-05-08 Legal ReviewPending DPO ApprovalPending (Alem Bašić) CEO
ApprovalPending

Revision #4

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