

# GDPR Subprocessor Change Notice

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## GDPR Subprocessor Change Notice Template

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### Subprocessor Change Notice

SUBPROCESSOR CHANGE NOTICE — {{notice\_reference}}

From: {{processor\_name}} To: {{controller\_name}} Date: {{notice\_date}} Legal basis: Article 28(2) GDPR — notice of intended change under general written authorisation, per the Data Processing Agreement between the parties.

Intended change: {{processor\_name}} intends to engage the following subprocessor ({{change\_type}} — if a replacement, replacing {{replaced\_subprocessor}}).

### 1. Details of the intended change

Complete every row. EDPB Opinion 22/2024 treats name-only notices as inadequate for non-trivial processing. If the processing location is outside the EEA, the transfer mechanism row is mandatory (Standard Contractual Clauses per Decision (EU) 2021/914, or an adequacy decision).

Field	Details
Subprocessor (legal entity)	{{subprocessor_name}}
Registered address	{{subprocessor_address}}
Contact person	{{subprocessor_contact}}
Service / processing description	{{service_description}}
Categories of personal data	{{data_categories}}
Categories of data subjects	{{data_subjects}}
Processing location (country)	{{processing_location}}
Transfer mechanism (SCCs / adequacy / n-a EEA-only)	{{transfer_mechanism}}
Security guarantees (certifications / measures)	{{security_guarantees}}

Field	Details
Effective date	{{effective_date}}
Objection deadline and method	{{objection_deadline}} — {{objection_method}}

## 2. Your right to object

You may object to this change until {{objection\_deadline}} ({{objection\_window\_days}} days from the date of this notice), by {{objection\_method}}. If you object, we will make reasonable efforts to accommodate the objection — for example by not routing your data to the new subprocessor — and if no workaround is feasible, you may terminate the affected services as provided in the DPA. If we receive no objection by the deadline, the change will take effect on {{effective\_date}} in accordance with the DPA.

Further information: our complete, current subprocessor list is available at {{subprocessor\_list\_url}}. The same data-protection obligations as in our DPA with you will be imposed on {{subprocessor\_name}} by written contract (Article 28(4) GDPR), and {{processor\_name}} remains fully liable to you for its performance. Questions: {{dpo\_contact}}.

## 3. Email variant

Subject: Subprocessor change notice — {{subprocessor\_name}} ({{change\_type}}) — objection deadline {{objection\_deadline}}

Dear {{controller\_name}},

Under Article 28(2) GDPR and our Data Processing Agreement, we are informing you of an intended subprocessor {{change\_type}}:

- Subprocessor: {{subprocessor\_name}}, {{subprocessor\_address}} (contact: {{subprocessor\_contact}})
- Service / processing: {{service\_description}}
- Personal data: {{data\_categories}} relating to {{data\_subjects}}
- Processing location: {{processing\_location}} — transfer mechanism: {{transfer\_mechanism}}
- Security guarantees: {{security\_guarantees}}
- Effective date: {{effective\_date}}

You may object until {{objection\_deadline}} by {{objection\_method}}. If you object, we will seek a workaround; if none is feasible, you may terminate the affected services as provided in the DPA. Absent an objection by the deadline, the change takes effect as stated above.

Our current subprocessor list: {{subprocessor\_list\_url}}

Kind regards, {{processor\_name}} — Privacy Team ({{dpo\_contact}})

## 4. Objection-handling copy

Send within the acknowledgement time your DPA states (or 5 business days if unstated):

Dear {{controller\_name}},

Thank you for your objection of {{objection\_received\_date}} to our notice {{notice\_reference}} regarding {{subprocessor\_name}}. We confirm that your data will not be processed by {{subprocessor\_name}} while we assess your objection.

We will revert by {{response\_due\_date}} with either (a) a workaround under which your data is not routed to {{subprocessor\_name}}, or (b) confirmation that no workaround is feasible, in which case you may terminate the affected services without penalty as provided in the DPA, with the agreed wind-down period.

Your objection and its resolution will be recorded in our processing audit trail.

## 5. Approval workflow (internal — remove before sending)

Run all four gates, in order, before the notice leaves the building. GDPR sets no statutory notice window: the objection period comes from the applicable DPA (European practice: ~15 days typical, 30–60 days negotiated by enterprise and

regulated controllers, 90 days rare).

Gate	Owner	What it checks
1. Legal review	Legal	DPA-defined notice window, objection method and consequence per customer segment; longest applicable window applied (or notices segmented); Article 28(4) flow-down contract signed or scheduled before the effective date
2. DPO sign-off	DPO / privacy lead	Due diligence on the subprocessor completed; transfer analysis valid for the processing location; all notice fields complete — name-only drafts rejected
3. Publish	Trust / web owner	Public subprocessor register updated before or simultaneously with the notice, so list and notice are consistent (EDPB Opinion 22/2024: current at all times)
4. Notify & log	Privacy ops	Push notification sent to every affected controller; recipients, timestamp and content logged; objection clock started; go-live held until <code>{{objection_deadline}}</code> passes

# FILLED EXAMPLE (fictional — replace with your own data)

## Subprocessor Change Notice

SUBPROCESSOR CHANGE NOTICE — SUBPROC-2026-014

From: Aventura Software GmbH To: All subscribed customers (controllers) Date: 2026-07-03 Legal basis: Article 28(2) GDPR — notice of intended change under general written authorisation, per the Data Processing Agreement between the parties.

Intended change: Aventura Software GmbH intends to engage the following subprocessor (addition).

### 1. Details of the intended change

Field	Details
Subprocessor (legal entity)	Northmail ApS
Registered address	Njalsgade 21, 2300 Copenhagen, Denmark
Contact person	Mette Sørensen, Data Protection Lead, <a href="mailto:privacy@northmail.example">privacy@northmail.example</a>
Service / processing description	Transactional email delivery for in-app notifications; Northmail processes recipient addresses and message metadata only — content templates remain with Aventura
Categories of personal data	Contact data (name, email address); message metadata. No special categories
Categories of data subjects	Customer staff and end users receiving notifications
Processing location (country)	Denmark (EEA)
Transfer mechanism (SCCs / adequacy / n-a EEA-only)	n/a — processing remains within the EEA
Security guarantees (certifications / measures)	ISO 27001:2022 certified; TLS in transit, AES-256 at rest; annual third-party penetration test
Effective date	2026-08-03
Objection deadline and method	2026-07-24 — email to <a href="mailto:privacy@aventra.example">privacy@aventra.example</a> quoting reference SUBPROC-2026-014

### 2. Your right to object

You may object to this change until 2026-07-24 (21 days from the date of this notice, per clause 6.3 of our DPA), by email to [privacy@aventra.example](mailto:privacy@aventra.example) quoting reference SUBPROC-2026-014. If you object, we will make reasonable efforts to accommodate the objection — for example by not routing your data to Northmail ApS — and if no workaround is feasible, you may terminate the affected services as provided in the DPA. If we receive no objection by the deadline, the change will take effect on 2026-08-03 in accordance with the DPA.

Further information: our complete, current subprocessor list is available at <https://trust.aventra.example/subprocessors>. The same data-protection obligations as in our DPA with you will be imposed on Northmail ApS by written contract (Article 28(4) GDPR), and Aventura Software GmbH remains fully liable to you for its performance. Questions: [dpo@aventra.example](mailto:dpo@aventra.example).

### 3. Email variant

Subject: Subprocessor change notice — Northmail ApS (addition) — objection deadline 2026-07-24

Dear customer,

Under Article 28(2) GDPR and our Data Processing Agreement, we are informing you of an intended subprocessor addition:

- Subprocessor: Northmail ApS, Njalsgade 21, 2300 Copenhagen, Denmark (contact: Mette Sørensen, Data Protection Lead, [privacy@northmail.example](mailto:privacy@northmail.example))
- Service / processing: Transactional email delivery for in-app notifications; recipient addresses and message metadata only
- Personal data: Contact data (name, email address); message metadata — relating to customer staff and end users receiving notifications
- Processing location: Denmark (EEA) — transfer mechanism: n/a, processing remains within the EEA
- Security guarantees: ISO 27001:2022 certified; TLS in transit, AES-256 at rest; annual third-party penetration test
- Effective date: 2026-08-03

You may object until 2026-07-24 by email to [privacy@aventra.example](mailto:privacy@aventra.example) quoting reference SUBPROC-2026-014. If you object, we will seek a workaround; if none is feasible, you may terminate the affected services as provided in the DPA. Absent an objection by the deadline, the change takes effect as stated above.

Our current subprocessor list: <https://trust.aventra.example/subprocessors>

Kind regards, Aventura Software GmbH — Privacy Team ([dpo@aventra.example](mailto:dpo@aventra.example))

## 4. Objection-handling copy

Dear customer,

Thank you for your objection of 2026-07-15 to our notice SUBPROC-2026-014 regarding Northmail ApS. We confirm that your data will not be processed by Northmail ApS while we assess your objection.

We will revert by 2026-07-22 with either (a) a workaround under which your data is not routed to Northmail ApS, or (b) confirmation that no workaround is feasible, in which case you may terminate the affected services without penalty as provided in the DPA, with the agreed wind-down period.

Your objection and its resolution will be recorded in our processing audit trail.

## 5. Approval workflow (internal — remove before sending)

Gate	Owner	What it checks
1. Legal review	Legal	21-day window per clause 6.3 confirmed as the longest applicable across all customer segments; Northmail flow-down DPA signed 2026-06-28
2. DPO sign-off	DPO	Vendor due-diligence file NM-2026-03 complete; EEA-only processing confirmed, no transfer mechanism required; all notice fields complete
3. Publish	Trust page owner	<a href="https://trust.aventra.example/subprocessors">trust.aventra.example/subprocessors</a> updated 2026-07-03, consistent with the notice
4. Notify & log	Privacy ops	Notice emailed to 412 subscribed controller contacts 2026-07-03 09:00 CET; send log archived; objection deadline 2026-07-24 diarised; Northmail go-live held until then