

Annex 2: who processes Suite data on our behalf.

This is Annex 2 to the [data-processing schedule](#), published at its own permanent URL under its own version identifier. It is the same list for every TIF Suite customer, whichever of our companies is the contracting entity. Changing an entry moves this list to a new version without moving the terms of use.

Not yet superseded. This archived copy of version 2026-08-31 is currently also the current version. Check the [current page](#) to confirm whether a newer version now applies.

VERSION

Effective date and version identifier.

STATUS	In force. This version of the list applies from 31 August 2026. It is permanent: once published, a version is never edited or removed, and a change mints a new identifier.
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CURRENT VERSION	/legal/sub-processors/ — check here for whether a newer version has since superseded this one.

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WHO PUBLISHES THIS LIST

The publishers.

This list is published by TIF Synergy Ireland Limited (registered in Ireland, company registration number 821025, registered office 77 Camden Street Lower, D02 XE80, Dublin, Ireland) and by Blauw Belastingen B.V. (KVK 58905375, Oudezijds Achterburgwal 173, 1012 DJ Amsterdam, the Netherlands). It is Annex 2 to both entities' data-processing schedules and is identical for both.

This annex has its own version identifier: SUBPROCESSOR_LIST_VERSION = 2026-08-31. It changes under clause DP6 and a change to it is not a change to the terms of use.

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This list is the same list for every TIF Suite customer, whichever of our companies is your contracting entity. The "engaged by" column says who engaged each entry. **The data-processing schedule that applies to you says which of the entities named here is your processor and which are sub-processors**, and in this annex "we" means whichever of our companies is your contracting entity under that schedule.

Column key. "Whose data" says which of the two roles the entry sits in. **Your content** means data you put into a tool, for which you are the controller and we are the processor: **these are the entries your authorisation under clause DP6.1 covers. Account data** means data about the people who use a tool, for which we are the controller: listed for transparency, not for your authorisation.

#	Sub-processor	Legal entity	Engaged by	What it does	Whose data	Tools	Location and transfer basis
1	Microsoft Azure, compute and storage	Microsoft B.V. , Evert van de Beekstraat 354, 1118 CZ Amsterdam, Netherlands. KvK 34061536	Blauw Belastingen B.V.	Hosting: Container Apps, Blob, Files, Cosmos DB, PostgreSQL, Key Vault	Your content and account data	All four	West Europe, Netherlands. Microsoft personnel and Microsoft companies outside the EEA can reach this data, by the four routes at clause DP7.2: engineering remote access, security processing transferred to any Azure region worldwide, network transit and directory replication. Those transfers are made by Microsoft under the standard contractual clauses annexed to the Microsoft Products and Services Data Protection Addendum. Microsoft's EU Data Boundary commitments limit where processing is performed and are not themselves a transfer mechanism
2	Microsoft Entra	Microsoft B.V.	Blauw Bel	Identity and sign-in	Account data	All four	Netherlands tenant. Microsoft's own access as row 1 and two of those routes are specific to this service: Microsoft processes sign-in data centrally across geographies for security purposes such as detecting an impossible journey

#	Sub-processor	Legal entity	Engaged by	What it does	Whose data	Tools	Location and transfer basis
	External ID		asting en B.V.				between two sign-ins. It may also replicate limited directory data, including a username and an email address, outside the EU Data Boundary to provide the service
3	Azure Open AI Service	Microsoft B.V.	Blauw Belasting en B.V.	Answer composition, embeddings, tag suggestion	Your content	TaxLex, TaxTag	TaxTag: West Europe, on a deployment confined to Microsoft's EU data zone. TaxLex: the accounts are in Sweden Central and West Europe, both in the EEA and answer composition runs on a deployment inside Microsoft's EU data zone by default. Two models a user can select in TaxLex, gpt-5.4-nano and gpt-5.4-pro, exist only as globally routed deployments, so Microsoft may process a request sent to either in any region in which the model is deployed, including outside the EEA. Content from documents in your library is never sent to either: where library content is in the material assembled to answer a question, TaxLex uses the EU deployment. Your question is also turned into a search vector by this same service before any model sees it. That step runs on the West Europe account, on a deployment confined to Microsoft's EU data zone, so it is the model you choose that decides whether a request leaves the EEA rather than this step. Where a TaxLex request is served from is not fixed in advance. Data stored at rest stays in the geography the resource is in whichever deployment type serves the request; only the place of processing changes. Transfers on this route are made by Microsoft under the standard contractual clauses annexed to the Microsoft Products and Services Data Protection Addendum. See clause DP7.3 and section 5A of our transfer impact assessment. Microsoft's acceptable use policy and its Enterprise AI Services Code of Conduct, which clause 6.5 of the terms requires you to keep to, are published at https://aka.ms/AI-CoC
4	Azure AI Document Intelligence	Microsoft B.V.	Blauw Belasting en B.V.	Reading uploaded documents	Your content	TaxLex, TaxTracker	West Europe. Microsoft's own access as row 1
5	Azure AI Search	Microsoft B.V.	Blauw Belasting en B.V.	Search index behind TaxLex	Your content	TaxLex	West Europe. Microsoft's own access as row 1
6	Azure Monitor, Application Insights and Log Analytics	Microsoft B.V.	Blauw Belasting en B.V.	Telemetry and a copy of the audit log	Account data	TaxLex, TaxTag, TaxTracker	West Europe. Microsoft's own access as row 1
7	Azure Communication Services Email	Microsoft B.V.	Blauw Belasting en B.V.	Notification and questionaire-invitation emails	Account data and the recipient's details	TaxTracker	Europe data location. Microsoft's own access as row 1
8	Microsoft 365, being the email and productivity system our group uses to	Microsoft B.V.	Blauw Belasting en B.V.	Correspondence with you about the tools, including support, data-subject requests we pass on to you and the notices	Your content and account data , both, because support correspondence about your problem routinely	All four	We do not state a data location for this service. That is a disclosure rather than an omission. A Microsoft 365 tenant's data location is a per-service setting that can differ between Exchange, SharePoint and Teams, so one country in this cell would flatten several answers into one. We tell you the current per-service locations on request. That is a commitment we give here rather than an invitation to ask. We do not print a location we have not read off the tenant. What is stated, because it is the part of this row a reader needs: Microsoft personnel and Microsoft companies outside the European Economic Area can reach data held in this service, as they can for the Microsoft services at rows 1 to 7, under the same Microsoft Products and Services Data Protection Addendum. A transfer out of the EEA on that route is made by Microsoft under the standard contractual clauses annexed to that addendum. The four routes set out at row 1 are written from Microsoft's Azure material, so they are not restated here as though they had been read for this service. This is the mailbox through which every human interaction

#	Sub-processor	Legal entity	Engaged by	What it does	Whose data	Tools	Location and transfer basis
	correspond with you			we send you under clause DP6.4	carries extracts of your content		about your content passes, so the access position is stated in its own right rather than left to be inferred from another row.
9	Send Grid	Twilio Inc. or SendGrid, Inc. , both Delaware corporations. Twilio's data protection addendum names both as possible contracting parties. We do not state which of them holds the account, because the answer changes nothing you would rely on: Twilio Inc. is the organisation self-certified under the framework and the named data importer under the clauses on either footing.	Blauw Belastingen B.V.	Password-reset email and the Pillar Two alert digest	Account data only. No content you put into a tool ever passes through this route	TaxL ex	United States. Twilio's addendum ranks two mechanisms rather than naming one. First the EU-US Data Privacy Framework, Twilio Inc. being the organisation self-certified under it. Second the standard contractual clauses, designated to apply automatically if that self-certification falls away. Twilio Inc. is the named data importer under those clauses whichever company holds the account, so the ranking is the same either way. The module of those clauses is stated in the data-processing schedule that applies to you
10	Blauw Belastingen B.V., trading as TIF Synergy	Blauw Belastingen B.V. , a private limited company incorporated in the Netherlands, KvK 58905375, registered office in Amsterdam, Netherlands	TIF Synergy Ireland Limited	Development, hosting, operation and support of the tools. It engages the providers at rows 1 to 9	Your content and account data, both	All four	Netherlands. Inside the European Economic Area, so not a transfer within Chapter V and no transfer mechanism is needed. See clause DP7.3

Changes to this list

Version	Date it applies from	What changed
2026-08-28	28 August 2026	First published version
2026-08-31	31 August 2026	Anthropic Ireland, Limited removed. It is no longer engaged, so under clause DP6.2 it is no longer on the current list. No entry was added, no other entry changed and the entries below it were renumbered to close the gap

QUESTIONS?

Write to info@tifsynergy.com with any sub-processor question.