

Data Processing Agreement for Oracle EU Sovereign Cloud Statement of Changes

Effective date: June 2nd, 2025

OVERVIEW

This statement of changes describes the changes made to the Data Processing Agreement for Oracle EU Sovereign Cloud dated June 2nd, 2025 (“DPA”).

KEY CHANGES

Section 1—Scope and Applicability

- Section 1 has been updated to add an order of precedence clause.

Section 5 — Oracle Affiliates and Third Party Subprocessors

- A specific reference was introduced to the List of Oracle Affiliates for EU Sovereign Cloud.

Section 6 —Cross-border Personal Information Transfers

- Section 6.1., the order of precedence clause has been rewritten for more clarity around EU hosting and processing.
- Section 6.2. has been updated to clarify the limited exceptions to Section 6.1 when the customer instructs Oracle to share Personal Information outside the EU data center region, such as when the Customer enables a third party service or connects with an Oracle Cloud service hosted outside the EU data center region.
- Section 6.3 has been updated to reference Module 3 (Processor to Processor) of the EU Standard Contractual Clauses in addition to Module 2 (Controller to Processor), which apply as appropriate to the limited data transfers described under Section 6.2.

Section 11 – Legal Requirements

Data minimization requirement introduced for responding to a request for access to Personal Information

Section 13 — Definitions

- The reference to the Swiss Data Protection Law has been updated.
- The definitions of Applicable (global) Data Protection Laws, UK Data Protection Law and CCPA-related terms have been removed. Throughout the entire document, reference is made only to Applicable European Data Protection Law.
- The definition of Information Breach was updated to cover a breach of security resulting in the actual or potential loss of confidentiality, integrity or availability of Customer Content.