

ACCENTURE INCIDENT RESPONSE SERVICES DATA SAFEGUARDS AND SUBPROCESSORS

Revision Date: October 2025

Data Safeguards Procedures for the Protection of Client Personal Data

These data safeguards (“**Data Safeguards**”) set forth the security framework that Client and Accenture will follow with respect to protecting Client Data in connection with the Agreement. In the event of a conflict between these Data Safeguards and any terms and conditions set forth in the Agreement, the terms and conditions of these Data Safeguards shall prevail.

Security Standards.

1. General Obligations. Each Party will:
 - maintain and comply with globally applicable standards, policies and procedures intended to protect data within their own respective environments (e.g., systems, networks, facilities) and such standards will govern and control in their respective environments;
 - comply with the other Party’s standards when accessing or operating within the other Party’s environments; and
 - provide timely notice of any changes to such standards that may materially degrade the security of the Services.

2. Accenture Standards. Accenture’s applicable security standards are as set out online, accessible here: <https://www.accenture.com/client-data-safeguards> subject to the following variations solely applicable to IR Services:
 - **Network and Application Design and Management:** The parties acknowledge and agree that the use of network based web-filtering, email based DLP, and/or security tools which actively block or prevent the transportation and investigation of potentially malicious software may not be implemented on infrastructure dedicated to the delivery of IR Services.
 - **Workstations:** The parties acknowledge and agree that the use of host based web-filtering and/or security tools which actively block or prevent the transportation and investigation of potentially malicious software may not be implemented on workstations dedicated to the delivery of IR Services.

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List of Subprocessors

Unless otherwise agreed in the applicable Order Confirmation, the following Accenture Affiliates may deliver the IR Services.

Accenture Affiliates

Delivery Country	Accenture Affiliate	Processing Activity
Argentina	Accenture S.R.L	Remote access to Client data by Accenture personnel using IR toolsets and technology for the purpose triaging, scoping, analysing and investigating the incident.
Australia	Accenture Australia Pty Ltd	
Austria	Accenture GmbH	
Brazil	Accenture do Brazil Limitada	
Bulgaria	Accenture Bulgaria DOOO	
Canada	Accenture Inc.	
Colombia	Accenture Ltda	
Czech Republic	Accenture Central Europe B.V.	
Finland	Accenture Oy	
France	Accenture S.A.S.U	
Germany	Accenture GmbH	
India	Accenture Solutions Private Limited	
Israel	Accenture Ltd	
Italy	Accenture S.p.A, and Accenture Technology Solutions SRL	
Japan	Accenture Japan Ltd	
Switzerland	Accenture AG	
Philippines	Accenture, Inc.	
United Kingdom	Accenture (UK) Limited	
U.S.A	Accenture LLP	

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Third Party Subprocessors

Third Party Subprocessor	Services Provided and Related Purpose	Country Where Data is Stored/Processed
Microsoft Corporation	Provision of virtual cloud environment for the temporary hosting of Client Forensic Data for analysis by Accenture	Either in country or the same region (e.g. within EU for European clients) based on Client location
Microsoft Corporation	Microsoft Teams may be used as a collaboration tool during an engagement to share engagement details. Such details may contain Client personal data.	USA
Microsoft Corporation	The Microsoft Azure Open AI service may be used during an engagement as part of regular service delivery. Such capability may necessitate including Client Personal Data in the prompts.	The closest region available based on Client location (Azure available regions are listed at this URL: https://azure.microsoft.com/en-us/explore/global-infrastructure/data-residency/#overview),*
Google LLC	Google's proprietary foundation models or LLMs may be used during an engagement as part of regular service delivery. Such capability may necessitate including Client Personal Data in the prompts.	The closest region available based on Client location (GCP available regions are listed at this URL: https://cloud.google.com/about/locations).*
Amazon Web Services, Inc.	The Amazon Bedrock service may be used during an engagement as part of regular service delivery. Such capability may necessitate including Client Personal Data in the prompts.	The closest region available based on Client location (AWS Bedrock available regions are listed at this URL: https://docs.aws.amazon.com/bedrock/latest/userguide/bedrock-regions.html).*

*No Client Data is stored.