

Executive Summary – Service Now Transfer Impact Assessment

Changes and revision

Version	Description	Date	Elaborated by
1.0	The Transfer Impact Assessment was completed by GCOS prior to the Q2 2024 acquisition, which included ServiceNow. Please refer to the prior versions for additional details.	23.03.2023	-
2.0	Review performed and content transferred to a Unit IT template	22.04.2026	LNS, TLB

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1. ServiceNow Transfer Impact Assessment – Customer Summary

Unit IT has conducted an updated Transfer Impact Assessment (TIA) for its use of the ServiceNow platform following regulatory developments related to international data transfers and the Schrems II judgment. This assessment evaluates how personal data is processed, stored, and accessed when Unit IT delivers IT service management (ITSM) and customer support services using ServiceNow.

ServiceNow is operated by Unit IT on a dedicated European instance hosted in secure data centres located in Ireland and the Netherlands. Customer data processed through ServiceNow is stored within the EU/EEA. The assessment focuses exclusively on the ServiceNow core functionalities implemented by Unit IT and does not cover any optional add-on services or customer-specific configurations outside this scope. Uploading or processing of additional information is the sole responsibility of the customer acting as data controller for such processing activities.

To address the requirements of Chapter V of the GDPR, Unit IT has mapped all relevant data flows and assessed potential international access scenarios. While ServiceNow maintains a global support organisation, access to customer data is primarily performed by EU-based personnel. In limited and exceptional cases, ServiceNow staff located outside the EU/EEA may access EU-hosted data remotely for troubleshooting or operational support purposes. Such access is strictly controlled, time-limited, logged, and performed without transferring or storing data outside the EU.

1.1 Contractual measures protecting Personal Data

A Data Processing Agreement (DPA), incorporating the EU Standard Contractual Clauses (SCCs), provides contractual safeguards ensuring that customer data, including personal data, from the selected regions, is not transferred outside the EU/EEA unless required by applicable law or a binding governmental order.

Sub-processors are contractually required, through ServiceNow's data processing agreements, to notify ServiceNow of any such legal requirements. Unit IT expects ServiceNow, Inc. to promptly pass on any relevant notifications to Unit IT.

Where international access or transfers may occur, Unit IT relies on appropriate and legally recognized transfer mechanisms, including:

- the EU–US Data Privacy Framework (DPF) for applicable US-based entities,
- Standard Contractual Clauses (SCCs) pursuant to Article 46 GDPR, and
- relevant EU adequacy decisions for specific third countries.

1.2 Supplementary measures protecting Personal Data

To further reduce residual risks, Unit IT has implemented supplementary technical and organisational measures, including opting into ServiceNow's with EU-only access and EU data residency model. This configuration is designed to ensure that customer data remains processed and retained within the EU/EEA, while access from third countries is restricted to clearly defined, exceptional scenarios and subject to enhanced oversight.

Most support issues are handled by Unit IT's own support organization. Additional troubleshooting is predominantly performed by ServiceNow personnel located within the EU. In limited and exceptional cases, employees from ServiceNow entities in third countries may be involved in providing assistance, subject to established controls and safeguards.

Based on the assessment performed in line with the European Data Protection Board (EDPB) recommendations, Unit IT concludes that the identified safeguards and controls appropriately mitigate risks associated with the use of ServiceNow. The processing activities covered by this assessment are therefore considered permissible under the GDPR, provided that the defined measures remain in place.

1.3 Validation, review, and disclaimer

Unit IT stands behind the analysis and conclusions set out in this Transfer Impact Assessment (TIA), as reviewed and confirmed by CISO & Compliance on 22 April 2026.

The TIA will be reviewed and updated at least annually, or earlier in the event of material changes to the service, legal framework, or processing activities. Unit IT will maintain an ongoing dialogue with ServiceNow to ensure continued alignment with evolving EU data protection requirements and applicable cloud regulatory obligations.

This summary is provided for informational purposes only and does not constitute legal advice. Customers are encouraged to carry out their own assessments and risk evaluations based on their specific circumstances and applicable regulatory requirements.

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