

EU Data Act Transparency Statement: Coupa Hosted Application

This transparency statement is issued by Coupa Software Incorporated ("**Coupa**") in accordance with Chapter VI of Regulation (EU) 2023/2854 (the "**EU Data Act**"). It applies to customers of Coupa Hosted Applications registered within a member state of the EU/EEA.

Hosted Applications provided for a limited duration for testing and evaluation purposes or not offered at broad commercial scale (e.g. early access program) are exempt from the switching obligations under the EU Data Act.

1. Jurisdiction of ICT Infrastructure

Coupa is incorporated in the State of Delaware, United States, as a U.S.-incorporated entity. Coupa and Coupa Hosted Application may be subject to U.S. law. The ICT infrastructure used to process customer data is situated in the jurisdiction(s) specified in the applicable Order Form. A comprehensive list of Coupa's subprocessors and their respective processing locations is available in the Coupa Subprocessor Guide at coupa.com/legal.

2. Measures to Prevent Unlawful International Governmental Access

Coupa has implemented the technical, organizational, and legal safeguards specified to prevent unauthorized international governmental access to, or transfer of, non-personal data held in the EU/EEA where such access would conflict with EU or Member State law:

Technical Measures: Encryption for data in transit and at rest, firewall-segregated database infrastructure, application-level data isolation, and robust intrusion detection. Access is strictly limited to authenticated secure sessions. Full technical details are available in Exhibit A-3.

Organizational Measures: Maintenance of ISO/IEC 27001 certification, rigorous "need-to-know" access controls, comprehensive personnel screening, and mandatory confidentiality agreements. Regular SOC 1 and 2 audits in addition to internal reviews of information security measures. Coupa has a formal Data Request and Enquiries Policy in place which governs all governmental access requests to Customer Data processed by Coupa. Coupa's Privacy team evaluates the access request including whether it is legally binding on Coupa, and it takes all reasonable steps to limit access to the data. Coupa informs the customer/data subject of the request.

Contractual Measures: Subprocessors are bound by written data protection obligations consistent with the Agreement. Cross-border transfers of personal data are governed by Standard Contractual Clauses under the GDPR.

See in the MSA, especially Exhibit A-3, and DPA for more information.

3. Switching Procedures and Data Portability

Customer data is made available for download via the customer's Coupa SFTP site. Data and attachments remain available for 30 days from the date of provision.

Exportable Data Categories	
Category	Contents
Transactional data (standard)	Approvals, requisition headers/lines, purchase orders, invoice headers/lines/receipts, payment reconciliation details
Transactional data (entitlement-dependent)	Expense lines, quote requests/responses/lines, evaluation weights/feedback
Attachments	Order, invoice, contract, expense, and quote attachments in native format (PDF, JPEG, MSG, DOC, TXT)

The exact reports provided depend on the customer's entitlements.

Exempted Data Categories

Data from the following products is not included in the standard extraction: AIC, CCW, CLMA, CSO, Risk Assess, Risk Aware, RPM, RPMA, SIM, and Supply Chain.⁷ Customers may export this data directly from their instance during the decommissioning period.

Data Formats

Transactional reports: CSV. Decommissioning Package (EU Data Act): JSON and CSV. Attachments: native format within ZIP archives.

4. Service Fees, Termination Penalties, and Switching Charges

Standard service fees. Subscription fees for the Coupa Hosted Application are as set out in the applicable Order Form.

Early termination penalties. Where a customer exercises switching rights during a fixed Subscription Term, an early termination fee equal to the aggregate fees that would have been payable for the affected Hosted Applications for the remainder of the Subscription Term will apply.

5. Contact

For questions regarding this transparency statement, switching procedures, or the exercise of rights under the EU Data Act: legalnotices@coupa.com.

6. EU Establishment

Coupa main establishment in the EU is:

Coupa Operations Inc., Ireland Branch, Estuary House – Block P7 Eastpoint Business Park, Dublin 3, Ireland