

We care about your privacy

Learn about the GDPR and privacy efforts made by Pleaz to protect our customers' data.

Table of Contents

Vendor Information
Contact Information
Privacy Information
Pleaz
Subprocessors
Processing locations
Security information & certifications
Data transfers
Data processing agreements
Personal data
Data retention & deletion
Subprocessors
Google Ads
Google Analytics
Google Tag Manager
Hubspot
Intercom
Microsoft 365
TwentyThree
WP Engine



Pleaz

Vendor: Pleaz ApS

Wellness and Fitness Services

pleaz Pleaz

Website	https://pleaz.io/
Country	DK
Address	Lyngbyvej 17, st., 2100 Copenhagen, Denmark

Privacy information

Privacy policy	https://pleaz.io/privacy/
Privacy contact email	mava@pleaz.io

pleaz Subprocessors

Used by Pleaz ApS

Subprocessors are companies that provide a service for Pleaz ApS and who has or potentially will get access to personal data of Pleaz ApS customers.

Last updated on 2022-06-17 by Openli



Google Ads by Google Ireland Limited

Description

online advertising platform

Address

Gordon House, Barrow Street, Dublin 4 Ireland
Ireland

Processing locations

Ireland



Google Analytics by Google Ireland Limited

Description

Google Analytics lets you measure your advertising ROI as well as track your Flash, video, and social networking sites and applications

Address

Gordon House, Barrow Street, Dublin 4 Ireland
Ireland

Processing locations

Ireland



Google Tag Manager by Google Ireland Limited

Description

Google Tag Manager gives you the ability to add and update your own tags for conversion tracking, site analytics, remarketing, and more.

Address

Gordon House, Barrow Street, Dublin 4 Ireland
Ireland

Processing locations

Ireland



Hubspot by Hubspot, Inc.

Description

Marketing automation platform

Purpose

CRM activities

Address

25 First Street, 2nd Floor Cambridge, MA 02141 United States
United States

Processing locations

Germany, Ireland, United States



Intercom by Intercom R&D Unlimited Company

Description

Customer service platform

Purpose

Email notifications to users

Address

2nd Floor, Stephen Court 18-21 St. Stephen's Green Dublin 2, Ireland
Ireland

Processing locations

Ireland



Microsoft 365 by Microsoft Ireland Operations Limited

Description

Microsoft platform. Includes Word, Excel, PowerPoint, OneNote, OneNote, OneDrive, Outlook, Teams

Purpose

Hosting, Email, internal communication, data processing and analytics

Address

One Microsoft Place, South County Business Park, Leopardstown, Dublin 18 D18
P521 Ireland
Ireland

Processing locations

Ireland



TwentyThree by TwentyThree Aps

Description

The Video Marketing Platform

Purpose

Video hosting, website hosting and analytics

Address

Sortedam Dossering 5D 2200 Copenhagen N Denmark
Denmark

Processing locations

Denmark



WP Engine by WP Engine

Description

WP Engine powers digital experiences for websites and applications built on WordPress.

Address

Irongate House, 22-30 Duke's Place London, EC3A 7LP United Kingdom
United Kingdom

Processing locations

Netherlands



Processing locations

Used by Pleaz ApS

The location of the subprocessors that are processing data on behalf of Pleaz ApS. If data is sent outside the EEA there must be a legal basis for these transfers.

Last updated on 2023-07-11 by Laura Lobato

Location

Germany

Denmark

Ireland

Netherlands

United States



Security information & certifications

By Pleaz ApS

Statement or documentation of the security measures and practises Pleaz ApS has in place when handling personal data.

Last updated on 2023-08-11 by Openli



Security information

Statement

Encryption

Pleaz focuses on being a low-risk company, where the collection of personal data is minimal. The only personal data which will be used are the data described in this policy. Pleaz uses HTTPS to ensure secure encryption of your data.



Data Transfers

By Pleaz ApS

The basis for Pleaz ApS transfers of personal data outside EEA. Vendors can also add a description of their own impact assessment for data transfers.

Last updated on 2022-06-17 by Openli



Transfer information

Impact assessment

International Transfers

Information we collect may be stored, processed, and transmitted between any of the countries in which we operate, or our Sub-processors maintain data processing operations, to enable us to use the information in accordance with this policy. We shall at all times provide an adequate level of protection for the Customer Data processed, in accordance with the requirements of Data Protection Laws.



Data Processing Agreements

Between you and Pleaz ApS

The DPA is a contract between you and Pleaz ApS that has to be in place when processing personal data and transferring it Pleaz.

Last updated on 2022-11-14 by Openli



Data processing agreement

Comment

Unsigned DPA attached



Personal data

Used by Pleaz ApS

A description of the different categories of personal data and data subjects that Pleaz ApS is handling with the location of the Pleaz ApS.

Last updated on 2022-06-17 by Openli



Ordinary data

Types of data

- Information about your computer, including your IP address, geographic location, browser type and version, and operating system.
- Information about your visits and use of the website, including (but not limited to) the referral source, visit length, page views and navigation paths on the website.
- Information that you give us when we sign you up for our website. Such as email address and name.
- Information that you enter when using the services on our website. Information gathered while using our website includes when and how often you use our website.
- Information contained in any communication sent to us via email, including their communication content and metadata. Any other personal information that you submit to us.

Subjects

Website users, customers

Purpose

- Activating your use of the services available on our website.
- Sending messages, invoices, and payment reminders to you and collecting payments from you.
- Sending you email messages to remind you of relevant content on the platform or if specifically requested.
- Handling inquiries and complaints from or about you regarding our website.
- Keeping our website secure and preventing fraud.
- Verification of compliance with the terms and conditions of use of our website.
- Other relevant use.

Nature of processing



Data retention & deletion

By Pleaz ApS

Information about how long the data is kept for and when it's deleted.

Last updated on 2023-08-10 by Openli



Data retention & deletion policy

Description

On termination of the provision of personal data processing services, the data processor shall be under obligation to delete all personal data processed on behalf of the data controller and certify to the data controller that it has done so Union or Member State law requires storage of the personal data. Personal data is stored as long as the framework services is valid and effective between the parties and 12 months after the ending of the partnership when the personal data is automatically erased by the data processor.



Google Ads

Vendor: Google Ireland Limited

online advertising platform



Google Ads

Website <https://www.google.ie/>

Country IE

Address Gordon House, Barrow Street, Dublin 4 Ireland

Privacy information

Privacy policy <https://policies.google.com/privacy?hl=en>

Privacy contact address You can contact Google's Data Protection Office via their designated web-form: https://support.google.com/policies/contact/general_privacy_form



Processing locations

Used by Google Ireland Limited

The location of the subprocessors that are processing data on behalf of Google Ireland Limited. If data is sent outside the EEA there must be a legal basis for these transfers.

Last updated on 2022-11-28 by Openli

Location

Ireland



Security information & certifications

By Google Ireland Limited

Statement or documentation of the security measures and practises Google Ireland Limited has in place when handling personal data.

Last updated on 2023-08-11 by Openli



ISO 27001

Statement



ISO 27001

Statement

ISO 27001 is one of the most widely recognized, internationally accepted independent security standards. Google has earned ISO 27001 certification for the systems, applications, people, technology, processes and data centers serving a number of Google products. Certificate is valid until May 14, 2024.



Data Transfers

By Google Ireland Limited

The basis for Google Ireland Limited transfers of personal data outside EEA. Vendors can also add a description of their own impact assessment for data transfers.

Last updated on 2023-09-21 by Openli



EU SCC (Standard contractual clauses)

Impact assessment

<https://business.safety.google/adsprocessorterms/>



Secure third country

Impact assessment

The parties acknowledge that the European Data Protection Legislation does not require the SCCs or an Alternative Transfer Solution in order to process Customer Personal Data in or transfer it to an Adequate Country ("Permitted Transfers").



Data Processing Agreements

Between you and Google Ireland Limited

The DPA is a contract between you and Google Ireland Limited that has to be in place when processing personal data and transferring it Google Ads.

Last updated on 2023-04-21 by Openli



Data processing agreement

Comment

Google Ads Data Processing Terms: <https://business.safety.google/adsprocessorterms/>



Personal data

Used by Google Ireland Limited

A description of the different categories of personal data and data subjects that Google Ireland Limited is handling with the location of the Google Ireland Limited.

Last updated on 2023-04-21 by Openli



Ordinary data

Types of data

Customer Personal Data may include the types of personal data described at business.safety.google/adsservices.

Subjects

Customer Personal Data will concern the following categories of data subjects: data subjects about whom Google collects personal data in its provision of the Processor Services; and/or data subjects about whom personal data is transferred to Google in connection with the Processor Services by, at the direction of, or on behalf of Customer. Depending on the nature of the Processor Services, these data subjects may include individuals: (a) to whom online advertising has been, or will be, directed; (b) who have visited specific websites or applications in respect of which Google provides the Processor Services; and/or (c) who are customers or users of Customer's products or services.

Purpose

Google will process (including, as applicable to the Processor Services and the Instructions collecting, recording, organising, structuring, storing, altering, retrieving, using, disclosing, combining, erasing and destroying) Customer Personal Data for the purpose of providing the Processor Services and any related technical support to Customer in accordance with these Data Processing Terms.

Nature of processing

Google will process (including, as applicable to the Processor Services and the Instructions collecting, recording, organising, structuring, storing, altering, retrieving, using, disclosing, combining, erasing and destroying) Customer Personal Data for the purpose of providing the Processor Services and any related technical support to Customer in accordance with these Data Processing Terms.



Data retention & deletion

By Pleaz ApS

Information about how long the data is kept for and when it's deleted.

Last updated on 2023-08-10 by Openli



Data retention & deletion policy

Description

The data retention practices described at <https://policies.google.com/technologies/ads>



Google Analytics

Vendor: Google Ireland Limited

Google Analytics lets you measure your advertising ROI as well as track your Flash, video, and social networking sites and applications



Google Analytics

Website	https://analytics.google.com/
Country	IE
Address	Gordon House, Barrow Street, Dublin 4 Ireland

Privacy information

Privacy policy	https://policies.google.com/privacy?hl=en
Privacy contact address	You can contact Google's Data Protection Office via their designated web-form: https://support.google.com/policies/contact/general_privacy_form



Subprocessors

Used by Google Ireland Limited

Subprocessors are companies that provide a service for Google Ireland Limited and who has or potentially will get access to personal data of Google Ireland Limited customers.

Last updated on 2023-01-24 by Openli



Accenture by Accenture Co. Ltd.

Description

Customer Support

Address

218 TUN HWA S RD SEC 2 21ST FL CATHAY TAIPEI INTL BLDG B TAIPEI,
Taiwan Province of China 106
Taiwan

Processing locations

Taiwan



Accenture by Accenture, Inc.

Description

Customer Support

Address

MSE Building, Ayala Ave, Makati, 1200 Metro Manila, Philippines
Philippines

Processing locations

Philippines



Accenture by Accenture Japan Ltd.

Description

Customer support

Address

1-11-44, Akasaka Intercity, Akasaka, Minato Ku, JP-13, 107-8672, JP
Japan

Processing locations

Japan



Accenture by Accenture Limited

Description

Customer Support

Address

1 Grand Canal Square, Grand Canal Dock, Dublin, Ireland
Ireland

Processing locations

Ireland



Accenture by Accenture LLP

Description

Customer Support

Purpose

to provide customer and technical support, which may include phone and email support, response, diagnosis and resolution services, incident tracking, and responding to customer queries.

Address

161 N Clark St, Chicago, IL, 60601-3362, United States
United States

Processing locations

United States



Accenture SAS by Accenture SAS

Description

Customer Support

Address

118 Avenue de France Paris, 75013 France
France

Processing locations

France



Accenture by Accenture Solutions Private Limited

Description

Customer Support

Address

Accenture Solutions Pvt. Ltd. Plant-3, Godrej & Boyce Complex, LBS Marg, Vikhroli (W), Mumbai 400079. Maharashtra, India
India

Processing locations

India



Arteria by Arteria S.A.

Description

Customer Support

Address

Stawki 2A, 00-193 Warszawa
Poland

Processing locations

Poland



Atento by Atento Argentina S.A.

Description

Customer Support

Address

Balcarce 487, A4400 Salta, Argentina
Argentina

Processing locations

Argentina



Cognizant by Cognizant Serviços de Tecnologia e Software do Brasil S/A

Description

Customer Support

Address

Av. Maria Coelho Aguiar, 215 Centro Empresarial (CENESP) Bloco C – 3º andar,
Jardim São Luis, São Paulo – SP, 05804-900
Brazil

Processing locations

Brazil



Cognizant by Cognizant Technology Solutions de Argentina SRL

Description

Customer Support

Address

Moreno 877, C1091 AAQ, Buenos Aires, Argentina
Argentina

Processing locations

Argentina



Cognizant by Cognizant Technology Solutions de Mexico S.A. de C.V.

Description

Customer support

Address

Avenida Jaime Balmes 11, Torre C, Polanco, Polanco I Secc, 11510 Ciudad de
México, CDMX, Mexico
Mexico

Processing locations

Mexico



Cognizant by Cognizant Technology Solutions India Pvt. Ltd.

Description

Customer Support

Address

United States

Processing locations

India



Cognizant by Cognizant Technology Solutions Ireland Limited

Description

Customer support

Address

38 Mount Street UpperDublin, Ireland
Ireland

Processing locations

Ireland



Cognizant by Cognizant Technology Solutions Philippines, Inc.

Description

Customer Support

Address

1st-4th Floors, Science Hub Tower 4, 110 Campus Avenue, McKinley Town Center,
Fort Bonifacio, Taguig City, Metro Manila, Philippines
Philippines

Processing locations

Philippines



Cognizant by Cognizant Technology Solutions US Corporation

Description

Customer support

Address

211 Quality Cir, College Station, TX 77845, United States
United States

Processing locations

United States



Cognizant by Cognizant Worldwide Limited

Description

Technical Support Data Labeling

Purpose

Technical Support

Address

1 Kingdom Street, Paddington Central, London, W2 6BD
United Kingdom

Processing locations

Argentina, India, Ireland



Competence Call Center by Competence Call Center İstanbul Çağrı Merkezi Hizmetleri Anonim Şirketi

Description

Customer Support

Address

Flat Ofis Kağıthane İş Merkezi, Çağlayan Mahallesi Kent Caddesi No:2 B 1-2, 34403
Kağıthane, İstanbul
Turkey

Processing locations

Turkey



Concentrix by Concentrix Corporation

Description

Customer support

Address

44051 Nobel Dr. Fremont, CA 94538, United States of America
United States

Processing locations

United States



Concentrix by Concentrix Daksh Services India Private Limited

Description

Customer support

Address

DN 62, Millennium City Tower 2, 4th Floor, DN Block, Sector V, Bidhannagar,
Kolkata, West Bengal 700091, India
India

Processing locations

India



Dock 15 GmbH by Dock 15 GmbH

Description

Customer support

Address

Germany

Processing locations

Germany



EPAM by EPAM Systems, Inc.

Description

Technical support

Purpose

Technical Support

Address

41 University Dr #202, Newtown, PA 18940, United States
United States

Processing locations

Australia, Mexico, Poland, Switzerland, United States



FIS by FIS Global Business Solutions India Private Limited

Description

Customer support

Address

402, I Park, Plot No. 15, Phase IV, Gurugram, Haryana 122016, India
India

Processing locations

India



GALLUP ARTERIA MANAGEMENT by GALLUP ARTERIA MANAGEMENT SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ SPÓŁKA KOMANDYTOWA

Description

Customer Services

Address

Poland

Processing locations

Poland



GlobalLogic by GlobalLogic Inc.

Description

Data Labelling

Address

1741 Technology Drive, Suite 400, San Jose, CA 95110, United States
United States

Processing locations

Poland, United States



GlobalLogic by GlobalLogic Technologies Limited

Description

Data Labelling

Address

590A, Road 31, Jubilee Hills Hyderabad, Telangana – 500033
India

Processing locations

India



G Partner by G Partner Sp. z o.o.

Description

Online Advertising

Address

Arteria G Partner sp. z o.o. ul. Stawki 2A 00-193 Warsaw, Poland
Poland

Processing locations

Poland



HCL by HCL America Inc.

Description

Technical Support, Data Labeling

Address

330 Potrero Avenue Sunnyvale, California, 94085-4113, United States
United States

Processing locations

Poland, United States

 HCL by HCL (Ireland) Information Systems Ltd.

Description

IT Services & Solutions

Address

Telephone House, 43-47, Marlborough Road, Dublin1 EIR CODE, Dublin, D01
N279, Ireland
Ireland

Processing locations

Ireland

 HCL by HCL Technologies Limited

Description

IT Services & Solutions

Address

NSL Techzone Plot no 8 Sector-144, Noida, Uttar Pradesh - 201 304, India
India

Processing locations

India

 HCL by HCL Tecnologia da Informação Ltda.

Description

IT Services & Solutions

Address

Brazil

Processing locations

Brazil

 Infinity by Infinity Contact Inc.

Description

Customer support

Address

4700 Tama St SE, Cedar Rapids, IA 52403, USA
United States

Processing locations

United States

 Intelnet Global Services by Intelnet Global Services Private Limited

Description

Customer support

Address

1, GP Block, Sector V, Bidhannagar, Kolkata, West Bengal 700091, India
India

Processing locations

India



JAK-Marketing Dialog by JAK-Marketing Dialog

Description

Customer support

Address

Poniatowskiego 17, 95-200 Pabianice, Poland
Poland

Processing locations

Poland



K.K. Teledirect Japan by K.K. Teledirect Japan

Description

Customer support

Address

Level 17 Roppongi Hills North Tower, 6-2-31 Roppongi, Minato-ku, Tokyo 106-0032 Japan
Japan

Processing locations

Japan



Majorel by Majorel Ireland Limited

Description

Customer support

Address

Eastpoint Business Park, The Majorel Building, Fairview, Co. Dublin, 03, Ireland
Ireland

Processing locations

Ireland



Pendragon Sp. z.o.o. by Pendragon Sp. z.o.o.

Description

Customer support

Address

Poland

Processing locations

Poland



Petereit by PTS Petereit Services GmbH and Co. KG

Description

Telemarketing

Address

Hammerbrookstr. 94, 20097, Hamburg, Hamburg,Germany
Germany

Processing locations

Germany

 **Regalix** by Regalix Inc.

Description

Customer lifecycle management for sales, customer support and customer success

Address

Palo Alto, 2100 Geng Road, Suite 210, # 241, Palo Alto, CA, 94303
United States

Processing locations

United States

 **Regalix** by Regalix India Private Limited

Description

Customer lifecycle management for sales, customer support and customer success

Address

5th Floor, East Wing Raheja Towers Mahatma Gandhi Road Bengaluru Karnataka
IN 560001, Mahatma Gandhi Rd, Bengaluru, Karnataka, India
India

Processing locations

India

 **SCSK Serviceware Corporation** by SCSK Serviceware Corporation

Description

Customer support

Address

Toyosu Foresia 12F, 3-2-24, Toyosu, Koto-ku, Tokyo 135-0061, Japan
Japan

Processing locations

Japan

 **TDCX** by TDCX (MY) Sdn. Bhd.

Description

Customer support

Address

Level 7, Menara TH 1 Sentral, Jalan Stesen Sentral 5, Kuala Lumpur Sentral, 50470
Kuala Lumpur, Malaysia
Malaysia

Processing locations

Malaysia

 **Teleperformance** by Teleperformance España S.A.U.

Description

Customer support

Address

Av. de Burgos, 8A, 1º, 2º, 12º, Av. de Burgos, 28036 Madrid, Spain
Spain

Processing locations

Spain



Teleperformance by Teleperformance Portugal, S.A.

Description

Customer support

Address

AVENIDA ÁLVARO PAIS, 2 1600-873, LISBOA Portugal
Portugal

Processing locations

Portugal



TMJ by TMJ, Inc.

Description

Customer support

Address

Sumitomo Fudosan Nishi-Shinjuku Building, 7-20-1 Nishi-Shinjuku, Shinjuku,
Tokyo, 160-0023, Japan
Japan

Processing locations

Japan



TTEC by TTEC Brasil Serviços Ltda.

Description

Customer service

Address

Avenida Dos Autonomistas, 1400, Vila Yara Osasco/SP - CEP 06020-010
Brazil

Processing locations

Brazil



TTEC by TTEC Customer Care Management (Ireland) Limited

Description

Customer support

Address

81-85 Duncairn Gardens Belfast BT15 2GQ United Kingdom
Ireland

Processing locations

Ireland



TTEC by TTEC Europe BV

Description

Customer support

Address

Johan Cruijff Boulevard 61, 1101 DL Amsterdam, Netherlands
Netherlands

Processing locations

Netherlands



Wipro by Wipro IT Services Poland Sp. z o.o.

Description

Software and consulting

Address

al. Jerozolimskie 123A, 02-017 Warszawa, Poland
Poland

Processing locations

Poland



Zevas by Zevas Communications Ltd.

Description

Sales, content moderation, tech and customer support

Address

6-8, Cleve Business Park, Monahan Rd, Ballintemple, Cork, T12 CX73, Ireland
Ireland

Processing locations

Ireland



Processing locations

Used by Google Ireland Limited

The location of the subprocessors that are processing data on behalf of Google Ireland Limited. If data is sent outside the EEA there must be a legal basis for these transfers.

Last updated on 2022-11-28 by Openli

Location

Ireland



Security information & certifications

By Google Ireland Limited

Statement or documentation of the security measures and practises Google Ireland Limited has in place when handling personal data.

Last updated on 2023-08-11 by Openli



ISO 27001

Statement

Google ISO 27001 certificate attached



Data Transfers

By Google Ireland Limited

The basis for Google Ireland Limited transfers of personal data outside EEA. Vendors can also add a description of their own impact assessment for data transfers.

Last updated on 2023-09-21 by Openli



EU SCC (Standard contractual clauses)

Impact assessment

if Google has not adopted an Alternative Transfer Solution for any Restricted Transfers, then: (i) if Google's address is in an Adequate Country: (A) the SCCs (EU Processor-to-Processor, Google Exporter) will apply with respect to all Restricted Transfers from Google to Subprocessors; and (B) in addition, if Customer's address is not in an Adequate Country, the SCCs (EU Processor-to-Controller) will apply with respect to Restricted Transfers between Google and Customer (regardless of whether Customer is a controller and/or a processor); or (ii) if Google's address is not in an Adequate Country: (A) the SCCs (EU Controller-to-Processor) and/or SCCs (EU Processor-to-Processor) will apply (according to whether Customer is a controller and/or processor) with respect to Restricted Transfers between Customer and Google that are subject to the EU GDPR and/or the Swiss FDPAs; and (B) the SCCs (UK Controller-to-Processor) will apply (regardless of whether Customer is a controller and/or processor) with respect to Restricted Transfers between Customer and Google that are subject to the UK GDPR.



Secure third country

Impact assessment

Permitted Transfers. The parties acknowledge that the European Data Protection Legislation does not require the SCCs or an Alternative Transfer Solution in order to process Customer Personal Data in or transfer it to an Adequate Country ("Permitted Transfers").



Transfer information

Impact assessment

Google may process Customer Personal Data in any country in which Google or any of its Subprocessors maintains facilities.



Data Processing Agreements

Between you and Google Ireland Limited

The DPA is a contract between you and Google Ireland Limited that has to be in place when processing personal data and transferring it Google Analytics.



Last updated on 2021-11-24 by Openli



Data processing agreement

Comment

<https://business.safety.google/adsprocessorterms/>



Personal data

Used by Google Ireland Limited

A description of the different categories of personal data and data subjects that Google Ireland Limited is handling with the location of the Google Ireland Limited.



Last updated on 2021-12-22 by Openli



Ordinary data

Types of data

Online identifiers, including cookie identifiers, internet protocol addresses and device identifiers; client identifiers

Subjects

Customer Personal Data will concern the following categories of data subjects: data subjects about whom Google collects personal data in its provision of the Processor Services; and/or data subjects about whom personal data is transferred to Google in connection with the Processor Services by, at the direction of, or on behalf of Customer.

Purpose

Google will process (including, as applicable to the Processor Services and the Instructions collecting, recording, organising, structuring, storing, altering, retrieving, using, disclosing, combining, erasing and destroying) Customer Personal Data for the purpose of providing the Processor Services and any related technical support to Customer in accordance with these Data Processing Terms.

Nature of processing



Google Tag Manager

Vendor: Google Ireland Limited

Google Tag Manager gives you the ability to add and update your own tags for conversion tracking, site analytics, remarketing, and more.



Google Tag Manager

Website	https://tagmanager.google.com/#/home
Country	IE
Address	Gordon House, Barrow Street, Dublin 4 Ireland

Privacy information

Privacy policy	https://policies.google.com/privacy?hl=en
Privacy contact address	You can contact Google's Data Protection Office via their designated web-form: https://support.google.com/policies/contact/general_privacy_form



Subprocessors

Used by Google Ireland Limited

Subprocessors are companies that provide a service for Google Ireland Limited and who has or potentially will get access to personal data of Google Ireland Limited customers.

Last updated on 2023-01-24 by Openli



Accenture by Accenture Co. Ltd.

Description	Purpose
Customer Support	Customer support
Address	Processing locations
218 TUN HWA S RD SEC 2 21ST FL CATHAY TAIPEI INTL BLDG B TAIPEI, Taiwan Province of China 106 Taiwan	Taiwan



Accenture by Accenture, Inc.

Description	Purpose
Customer Support	Customer support
Address	Processing locations
MSE Building, Ayala Ave, Makati, 1200 Metro Manila, Philippines Philippines	Philippines



Accenture by Accenture Japan Ltd.

Description	Purpose
Customer support	Customer support
Address	Processing locations
1-11-44, Akasaka Intercity, Akasaka, Minato Ku, JP-13, 107-8672, JP Japan	Japan



Accenture by Accenture Limited

Description

Customer Support

Purpose

Customer support

Address

1 Grand Canal Square, Grand Canal Dock, Dublin, Ireland
Ireland

Processing locations

Ireland



Accenture by Accenture LLP

Description

Customer Support

Purpose

Customer support

Address

161 N Clark St, Chicago, IL, 60601-3362, United States
United States

Processing locations

United States



Accenture by Accenture Solutions Private Limited

Description

Customer Support

Purpose

Customer support

Address

Accenture Solutions Pvt. Ltd. Plant-3, Godrej & Boyce Complex, LBS Marg, Vikhroli (W), Mumbai 400079. Maharashtra, India
India

Processing locations

India



Cognizant by Cognizant Serviços de Tecnologia e Software do Brasil S/A

Description

Customer Support

Purpose

Customer support

Address

Av. Maria Coelho Aguiar, 215 Centro Empresarial (CENESP) Bloco C – 3º andar, Jardim São Luis, São Paulo – SP, 05804-900
Brazil

Processing locations

Brazil



Cognizant by Cognizant Technology Solutions de Argentina SRL

Description

Customer Support

Purpose

Customer support

Address

Moreno 877, C1091 AAQ, Buenos Aires, Argentina
Argentina

Processing locations

Argentina

 Cognizant by Cognizant Technology Solutions de Mexico S.A. de C.V.	
Description Customer support	Purpose Customer support
Address Avenida Jaime Balmes 11, Torre C, Polanco, Polanco I Secc, 11510 Ciudad de México, CDMX, Mexico Mexico	Processing locations Mexico
 Cognizant by Cognizant Technology Solutions Ireland Limited	
Description Customer support	Purpose Customer support
Address 38 Mount Street UpperDublin, Ireland Ireland	Processing locations Ireland
 Cognizant by Cognizant Technology Solutions Philippines, Inc.	
Description Customer Support	Purpose Customer support
Address 1st-4th Floors, Science Hub Tower 4, 110 Campus Avenue, McKinley Town Center, Fort Bonifacio, Taguig City, Metro Manila, Philippines Philippines	Processing locations Philippines
 Cognizant by Cognizant Technology Solutions US Corporation	
Description Customer support	Purpose Customer support
Address 211 Quality Cir, College Station, TX 77845, United States United States	Processing locations United States
 Cognizant by Cognizant Worldwide Limited	
Description Technical Support Data Labeling	Purpose Customer support
Address 1 Kingdom Street, Paddington Central, London, W2 6BD United Kingdom	Processing locations Argentina, India, Ireland



Concentrix by Concentrix Corporation

Description

Customer support

Purpose

Customer support

Address

44051 Nobel Dr. Fremont, CA 94538, United States of America
United States

Processing locations

United States



Concentrix by Concentrix Daksh Services India Private Limited

Description

Customer support

Purpose

Customer support

Address

DN 62, Millennium City Tower 2, 4th Floor, DN Block, Sector V, Bidhannagar,
Kolkata, West Bengal 700091, India
India

Processing locations

India



EPAM by EPAM Systems, Inc.

Description

Technical support

Purpose

Customer support

Address

41 University Dr #202, Newtown, PA 18940, United States
United States

Processing locations

Australia, Mexico, Poland, Switzerland, United States



FIS by FIS Global Business Solutions India Private Limited

Description

Customer support

Purpose

Customer support

Address

402, I Park, Plot No. 15, Phase IV, Gurugram, Haryana 122016, India
India

Processing locations

India



GlobalLogic by GlobalLogic Inc.

Description

Data Labelling

Purpose

Customer support

Address

1741 Technology Drive, Suite 400, San Jose, CA 95110, United States
United States

Processing locations

Poland, United States



GlobalLogic by GlobalLogic Technologies Limited

Description

Data Labelling

Purpose

Customer support

Address

590A, Road 31, Jubilee Hills Hyderabad, Telangana – 500033
India

Processing locations

India



Google Affiliate Service by Google Argentina S.R.L.

Description

Google Affiliate

Purpose

Provide service support, IT-facility management, and customer support functions

Address

Alicia M. De Justo 350, 2° Floor Dique IV, Puerto Madero Buenos Aires, Argentina,
C1107AAH
Argentina

Processing locations

Argentina



Google Affiliate Service by Google Asia Pacific Pte Ltd.

Description

Google Affiliate

Purpose

Provide service support, IT-facility management, and customer support functions

Address

8 Marina Boulevard #05-02 Marina Bay Financial Centre Singapore, Singapore,
018981
Singapore

Processing locations

Singapore



Google Affiliate Service by Google Australia Pty Ltd.

Description

Google Affiliate

Purpose

Provide service support, IT-facility management, and customer support functions

Address

Tower One - International Towers Sydney Level 46, 100 Barangaroo Avenue
Barangaroo, Australia, NSW 2000
Australia

Processing locations

Australia



Google Affiliate Service by Google Brasil Internet LTDA.

Description

Google Affiliate Service

Purpose

Provide service support, IT-facility management, and customer support functions

Address

Avenida Brigadeiro Faria Lima nº 3.477 17º, 18º, 19º e 20º andares Torre Sul Itaim
Bibi, São Paulo, Estado de São Paulo, Brazil, Cep 04538-133
Brazil

Processing locations

Brazil



Google Affiliate Service by Google Canada Corporation

Description

Google Affiliate Service

Purpose

Provide service support, IT-facility management, and customer support functions

Address

1741 Lower Street, Suite 600 Halifax, CAN_NS, Canada, B3J 0J2
Canada

Processing locations

Canada



Google Affiliate Service by Google France SARL

Description

Google Affiliate

Purpose

Provide service support, IT-facility management, and customer support functions

Address

8 Rue de Londres Paris, France, 75009
France

Processing locations

France



Google Affiliate Service by Google Germany GmbH

Description

Google Affiliate

Purpose

Provide service support, IT-facility management, and customer support functions

Address

ABC-Strasse 19 Hamburg, Germany, 20354
Germany

Processing locations

Germany



Google Affiliate Service by Google Israel Ltd.

Description

Google Affiliate

Purpose

Provide service support, IT-facility management, and customer support functions

Address

Electra Tower 98 Yigal Alon Street Tel Aviv, Israel, 6789141
Israel

Processing locations

Israel



Google Affiliate Service by Google Italy S.r.l.

Description

Google Affiliate

Purpose

Provide service support, IT-facility management, and customer support functions

Address

Via Federico Confalonieri 4 Milano
Italy

Processing locations

Italy



Google Affiliate Service by Google Netherlands B.V.

Description

Google Affiliate

Purpose

Provide service support, IT-facility management, and customer support functions

Address

Claude Debussylaan 34, 15th Floor Amsterdam, Netherlands, 1082 MD
Netherlands

Processing locations

Netherlands



Google Affiliate Service by Google New Zealand Limited

Description

Google Affiliate

Purpose

Provide service support, IT-facility management, and customer support functions

Address

Level 27, Lumley Centre 88 Shortland Street Auckland
New Zealand

Processing locations

New Zealand



Google Affiliate Service by Google Poland SP.z.o.o.

Description

Google Affiliate

Purpose

Provide service support, IT-facility management, and customer support functions

Address

ul. Emilii Plater no. 53 Warsaw, Poland, 00-113
Poland

Processing locations

Poland



Google Affiliate Service by Google Spain, S.L.U.

Description

Google Affiliate

Purpose

Provide service support, IT-facility management, and customer support functions

Address

Plaza Pablo Ruiz Picasso 1 Torre Picasso, Planta 26 Madrid, Spain, 28020
Spain

Processing locations

Spain



Google Affiliate Service by Google Switzerland GmbH.

Description

Google Affiliate

Purpose

Provide service support, IT-facility management, and customer support functions

Address

Brandschenkestrasse 110 Zurich, Switzerland, 8002
Switzerland

Processing locations

Switzerland



Google Affiliate Service by Google UK Ltd.

Description

Google Affiliate

Purpose

Provide service support, IT-facility management, and customer support functions

Address

Belgrave House, 76 Buckingham Palace Road London, United Kingdom, SW1W 9TQ
United Kingdom

Processing locations

United Kingdom



HCL by HCL America Inc.

Description

Technical Support, Data Labeling

Purpose

Customer support

Address

330 Potrero Avenue Sunnyvale, California, 94085-4113, United States
United States

Processing locations

Poland, United States



HCL by HCL (Ireland) Information Systems Ltd.

Description

IT Services & Solutions

Purpose

Customer support

Address

Telephone House, 43-47, Marlborough Road, Dublin1 EIR CODE, Dublin, D01 N279, Ireland
Ireland

Processing locations

Ireland



HCL by HCL Technologies Limited

Description

IT Services & Solutions

Purpose

Customer support

Address

NSL Techzone Plot no 8 Sector-144, Noida, Uttar Pradesh - 201 304, India
India

Processing locations

India



HCL by HCL Tecnologia da Informação Ltda.

Description

IT Services & Solutions

Purpose

Customer support

Address

Brazil

Processing locations

Brazil



Intelnet Global Services by Intelnet Global Services Private Limited

Description

Customer support

Purpose

Customer support

Address

1, GP Block, Sector V, Bidhannagar, Kolkata, West Bengal 700091, India
India

Processing locations

India



Majorel by Majorel Ireland Limited

Description

Customer support

Purpose

Customer support

Address

Eastpoint Business Park, The Majorel Building, Fairview, Co. Dublin, 03, Ireland
Ireland

Processing locations

Ireland



Regalix by Regalix Inc.

Description

Customer lifecycle management for sales, customer support and customer success

Purpose

Customer support

Address

Palo Alto, 2100 Geng Road, Suite 210, # 241, Palo Alto, CA, 94303
United States

Processing locations

United States



SCSK Serviceware Corporation by SCSK Serviceware Corporation

Description

Customer support

Purpose

Customer support

Address

Toyosu Foresia 12F, 3-2-24, Toyosu, Koto-ku, Tokyo 135-0061, Japan
Japan

Processing locations

Japan



TDCX by TDCX (MY) Sdn. Bhd.

Description

Customer support

Purpose

Customer support

Address

Level 7, Menara TH 1 Sentral, Jalan Stesen Sentral 5, Kuala Lumpur Sentral, 50470
Kuala Lumpur, Malaysia
Malaysia

Processing locations

Malaysia



Wipro by Wipro IT Services Poland Sp. z o.o.

Description

Software and consulting

Purpose

Customer support

Address

al. Jerozolimskie 123A, 02-017 Warszawa, Poland
Poland

Processing locations

Poland



Processing locations

Used by Google Ireland Limited

The location of the subprocessors that are processing data on behalf of Google Ireland Limited. If data is sent outside the EEA there must be a legal basis for these transfers.

Last updated on 2022-11-28 by Openli

Location

Ireland



Data Transfers

By Google Ireland Limited

The basis for Google Ireland Limited transfers of personal data outside EEA. Vendors can also add a description of their own impact assessment for data transfers.

Last updated on 2023-09-21 by Openli



EU SCC (Standard contractual clauses)

Impact assessment

As stated within Processing terms:

'if Google's address is in an Adequate Country:

(A)the SCCs (Processor-to-Processor, Google Exporter) will apply with respect to such Restricted European Transfers from Google to Subprocessors; and

(B)in addition, if Customer's address is not in an Adequate Country, the SCCs (Processor-to-Controller) will apply with respect to Restricted European Transfers between Google and Customer (regardless of whether Customer is a controller and/or a processor); or

(ii)if Google's address is not in an Adequate Country, the SCCs (Controller-to-Processor) and/or SCCs (Processor-to-Processor) will apply (according to whether Customer is a controller and/or processor) with respect to such Restricted European Transfers between Customer and Google.



Data Processing Agreements

Between you and Google Ireland Limited

The DPA is a contract between you and Google Ireland Limited that has to be in place when processing personal data and transferring it Google Tag Manager.

Last updated on 2022-11-24 by Openli



Data processing agreement

Comment

<https://business.safety.google/adsprocessor/terms/>



Personal data

Used by Google Ireland Limited

A description of the different categories of personal data and data subjects that Google Ireland Limited is handling with the location of the Google Ireland Limited.

Last updated on 2022-11-24 by Openli



Ordinary data

Types of data

Customer Personal Data may include the types of personal data described at [business.safety.google/adsservices](#).

Subjects

data subjects about whom Google collects personal data in its provision of the Processor Services; and/or
data subjects about whom personal data is transferred to Google in connection with the Processor Services by, at the direction of, or on behalf of Customer.

Purpose

Google will process (including, as applicable to the Processor Services and the Instructions collecting, recording, organising, structuring, storing, altering, retrieving, using, disclosing, combining, erasing and destroying) Customer Personal Data for the purpose of providing the Processor Services and any related technical support to Customer in accordance with these Data Processing Terms.

Nature of processing

Google will process (including, as applicable to the Processor Services and the Instructions collecting, recording, organising, structuring, storing, altering, retrieving, using, disclosing, combining, erasing and destroying) Customer Personal Data for the purpose of providing the Processor Services and any related technical support to Customer in accordance with these Data Processing Terms.



Data retention & deletion

By Pleaz ApS

Information about how long the data is kept for and when it's deleted.

Last updated on 2023-08-10 by Openli



Data retention & deletion policy

Description

Deletion During Term

Processor Services With Deletion Functionality. During the Term, if:

- (a) the functionality of the Processor Services includes the option for Customer to delete Customer Personal Data;
- (b) Customer uses the Processor Services to delete certain Customer Personal Data; and
- (c) the deleted Customer Personal Data cannot be recovered by Customer (for example, from the "trash"),

then Google will delete such Customer Personal Data from its systems as soon as reasonably practicable and within a maximum period of 180 days, unless European Laws require storage.

Processor Services Without Deletion Functionality. During the Term, if the functionality of the Processor Services does not include the option for Customer to delete Customer Personal Data, then Google will comply with:

- (a) any reasonable request from Customer to facilitate such deletion, insofar as this is possible taking into account the nature and functionality of the Processor Services and unless European Laws require storage; and
- (b) the data retention practices described at [policies.google.com/technologies/ads](#).

Google may charge a fee (based on Google's reasonable costs) for any data deletion under Section 6.1.2(a). Google will provide Customer with further details of any applicable fee, and the basis of its calculation, in advance of any such data deletion.

Deletion on Term Expiry Customer instructs Google to delete all remaining Customer Personal Data (including existing copies) from Google's systems at the end of the Term in accordance with applicable law. Google will comply with this instruction as soon as reasonably practicable and within a maximum period of 180 days, unless European Laws require storage.



Hubspot

Vendor: Hubspot, Inc.

Marketing automation platform



Hubspot

Website	https://www.hubspot.com/
Country	US
Address	25 First Street, 2nd Floor Cambridge, MA 02141 United States

Privacy information

Privacy policy	https://legal.hubspot.com/privacy-policy
Privacy contact email	privacy@hubspot.com
Privacy contact address	Nicholas Knoop, Data Protection Officer, HubSpot, Inc., 25 First Street, 2nd Floor, Cambridge, MA 02141 USA

Additional privacy information

At HubSpot, our entire organization is hard at work ensuring that our own practices are GDPR-compliant. But equally important to us is helping you, our partners and customers, understand what the GDPR means for your businesses and build compliant processes of your own.



Subprocessors

Used by Hubspot, Inc.

Subprocessors are companies that provide a service for Hubspot, Inc. and who has or potentially will get access to personal data of Hubspot, Inc. customers.

Last updated on 2023-09-07 by Openli



Aby by Aby Realtime Ltd.

Description	Purpose
	Conversation & Chat Functionality
Address	Processing locations
United Kingdom	Germany, Ireland, United States



AWS (Amazon Web Services) hosting by Amazon Web Services, Inc.

Description	Purpose
AWS on-demand cloud computing platform & hosting	Hosting & Infrastructure. Used as a on-demand cloud computing platforms and APIs
Address	Processing locations
410 Terry Ave N, Seattle 98109, Washington, USA United States	Germany, United States



Cloudflare by Cloudflare, Inc.

Description

Cloud Service Provider

Purpose

Content Delivery Network. Used as a web infrastructure and website security, providing content delivery network services, DDoS mitigation, internet security, and distributed domain name server services

Address

Cloudflare, Inc. 101 Townsend St. San Francisco, CA 94107 United States
United States

Processing locations

United States



Google Cloud Platform by Google, LLC

Description

cloud computing service

Purpose

Data hosting provider

Address

1600 Amphitheatre Parkway Mountain View, CA 94043, USA
United States

Processing locations

Germany, United States



Google Recaptcha by Google, LLC

Description

Captcha

Purpose

Form submission spam prevention. Used for HubSpot form submission spam prevention

Address

1600 Amphitheatre Parkway Mountain View, CA 94043, USA
United States

Processing locations

United States



Hubspot Affiliate by HubSpot Asia Pte. Ltd.

Description

Hubspot affiliate

Purpose

Services & Support

Address

Singapore

Processing locations

Singapore



Hubspot affiliate by HubSpot Australia Pty. Ltd.

Description

Hubspot affiliate

Purpose

Services & Support

Address

Australia

Processing locations

Australia

 HubSpot Affiliate by HubSpot Belgium NV	
Description Services & Support	Purpose Services & Support
Address Belgium	Processing locations Belgium
 Hubspot Affiliate by HubSpot Canada Inc.	
Description Hubspot affiliate	Purpose Services & Support
Address Canada	Processing locations Canada
 Hubspot Affiliate by HubSpot France S.A.S.	
Description Hubspot affiliate	Purpose Services & Support
Address France	Processing locations France
 Hubspot affiliate by HubSpot Germany GmbH	
Description Hubspot affiliate	Purpose Services & Support
Address Germany	Processing locations Germany
 Hubspot by HubSpot Ireland Ltd	
Description HubSpot offers a full platform of marketing, sales, customer service, and CRM software.	Purpose Services & Support
Address Ireland	Processing locations Ireland
 Hubspot Affiliate by HubSpot Japan KK	
Description Hubspot affiliate	Purpose Services & Support
Address Japan	Processing locations Japan



Hubspot Affiliate by HubSpot Latin America, S.A.S.

Description

Hubspot affiliate

Purpose

Services & Support

Address

Colombia

Processing locations

Colombia



Hubspot affiliate by HubSpot Netherlands B.V.

Description

Services & Support

Purpose

Services & Support

Address

Netherlands

Processing locations

Netherlands



Hubspot affiliate by HubSpot Spain, S.L.

Description

Hubspot affiliate

Purpose

Services & Support

Address

Spain

Processing locations

Spain



Hubspot Affiliate by HubSpot Sweden

Description

Hubspot affiliate

Purpose

Services & Support

Address

Sweden

Processing locations

Sweden



Hubspot Affiliate by HubSpot UK Holdings Ltd.

Description

Hubspot affiliate

Purpose

Services & Support

Address

United Kingdom

Processing locations

United Kingdom



HelloSign by JN PROJECTS Inc. dba HelloSign (Now Dropbox Sign)

Description

Legally Binding Electronic Signatures

Purpose

Product E-Signature Functionality. Used for HubSpot product E-signature solution for deals

Address

333 Brannan Street San Francisco, CA 94107
United States

Processing locations

Germany, United States



Litmus by Litmus Software, Inc.

Description

Email marketing platform

Purpose

Email Functionality. Used for email previews

Address

675 Massachusetts Ave., 10th Floor Cambridge, MA 02139, United States
United States

Processing locations

United States



Meta Platforms Inc. Affiliate by Meta Platforms Ireland Limited

Description

Meta Affiliate

Purpose

OPT-IN ONLY Conversation Functionality

Address

4 Grand Canal Square Grand Canal Harbour Dublin 2 Ireland
Ireland

Processing locations

United States



Mux by Mux, Inc

Description

API to video service

Purpose

Video functionality. Used for HubSpot video service provider

Address

1182 Market St. Suite 425 San Francisco, CA 94102, United States
United States

Processing locations

United States



OpenAI by OpenAI, L.L.C

Description

Artificial intelligence research service.

Purpose

AI Products

Address

3180 18th Street Suite 100 San Francisco, CA 94110
United States

Processing locations

United States



Snowflake by Snowflake Inc.

Description

cloud computing-based data warehousing company

Purpose

Reporting functionality. Data warehouse solution which serves as the repository of data.

Address

Snowflake Inc., Suite 3A, 106 East Babcock Street, Bozeman, Montana 59715
United States

Processing locations

Germany, United States



Twilio by Twilio, Inc.

Description

Two-factor authentication

Purpose

Calling functionality. Used as a service which allows HubSpot calling

Address

101 Spear Street, Suite 300 San Francisco, CA 94105, United States
United States

Processing locations

United States



ConvertAPI by UAB Baltsoft

Description

File conversion API

Purpose

Product File Functionality. Used for files and documents conversion for websites and web/desktop applications

Address

Lauksargio 111, Vilnius, LT-10105, Lithuania
Lithuania

Processing locations

Germany, United States



Processing locations

Used by Hubspot, Inc.

The location of the subprocessors that are processing data on behalf of Hubspot, Inc.. If data is sent outside the EEA there must be a legal basis for these transfers.

Last updated on 2023-07-11 by Openli

Location

Germany

Ireland

United States



Security information & certifications

By Hubspot, Inc.

Statement or documentation of the security measures and practises Hubspot, Inc. has in place when handling personal data.

Last updated on 2023-09-25 by Openli



Security information

Statement

Hubspot's security statement: <https://legal.hubspot.com/security>

Information about encryption: All sensitive interactions with the HubSpot products (e.g., API calls, login, authenticated sessions to the customer's portal, etc.) are encrypted in-transit with TLS 1.2, or 1.3 and 2,048 bit keys or better. Transport layer security (TLS) is also available by default for customers who host their websites on the HubSpot platform.

HubSpot leverages several technologies to ensure stored data is encrypted at rest. The physical and virtualized hard drives used by HubSpot product server instances as well as long-term storage solutions like AWS S3 use AES-256 encryption. User passwords are hashed and are encrypted at rest. Certain email features work by providing an additional level of both at-rest and in-transit encryption.



Security information

Statement

Penetration Test Summary: HubSpot Platform report can be found here: <https://legal.hubspot.com/security#downloadable-reports>

It requires you to sign an NDA to access and download it.

Security information

Statement

Hubspot Security overview attached (as of March 2023)

SOC 2

Statement

Available to download via Confidentiality Agreement (latest version covers the period from May1, 2022 to 30 April 2023). Here is a link so you can download it: <https://legal.hubspot.com/security#downloadable-reports>

SOC 3

Statement

Updated SOC 3 certificate for the period May1, 2022 to 30 April 2023 attached

Data Transfers By Hubspot, Inc.

The basis for Hubspot, Inc. transfers of personal data outside EEA. Vendors can also add a description of their own impact assessment for data transfers.

 Last updated on 2023-09-21 by Openli

DPF (EU-U.S. Data Privacy Framework)

Impact assessment

Hubspot has certified for the Data Privacy Framework.

More details about certification here: <https://www.dataprivacyframework.gov/s/participant-search/participant-detail?id=a2zt0000000TN8pAAG&status=Active>
HubSpot, Inc. will use the Data Privacy Framework to lawfully receive European Data in the United States and ensure that it provides at least the same level of protection to such European Data as is required by the Data Privacy Framework Principles and will let you know if it is unable to comply with this requirement.

EU SCC (Standard contractual clauses)

Impact assessment

SCCs are incorporated by reference into the DPA <https://legal.hubspot.com/dpa> (Section 8(f) - Transfer Mechanisms for Data Transfers).

Privacy Shield (NB Invalid!)

Impact assessment

Although HubSpot, Inc. does not rely on the EU-US Privacy Shield as a legal basis for transfers of Personal Data in light of the judgment of the Court of Justice of the EU in Case C-311/18, for as long as HubSpot, Inc. is self-certified to the Privacy Shield HubSpot Inc will process European Data in compliance with the Privacy Shield Principles and let you know if it is unable to comply with this requirement.

Swiss SCC (Standard contractual clauses)

Impact assessment

In relation to European Data that is subject to the Swiss DPA, the Standard Contractual Clauses will apply in accordance with the DPA: <https://legal.hubspot.com/dpa> (Section 8(f) - Transfer Mechanisms for Data Transfers).

TIA (Transfer Impact Assessment)

Impact assessment

Hubspot's transfer impact assessment can be downloaded here (it requires you to accept their NDA): <https://legal.hubspot.com/security#downloadable-reports>



Transfer information

Impact assessment

Data Privacy FAQs as of November 2022 attached



Transfer information

Impact assessment

Schrems II: https://www.hubspot.com/data-privacy/privacy-shield?utm_medium=email&_hsmi=60491770&_hsenc=p2ANqtz-9jile2xcvXns5DPkLxTpkW1hve7CyZ-O7s6i5QDBuakreQL7tXjDsgroZVGNaoD7rYU6mN5tVzD__5_Bzlv4J-HIVGeg&utm_source=hs_email



UK Addendum (International Data Transfer Addendum)

Impact assessment

In relation to European Data that is subject to the UK GDPR, the Standard Contractual Clauses will apply in accordance with the DPA <https://legal.hubspot.com/dpa> (Section 8(f) - Transfer Mechanisms for Data Transfers).



Data Processing Agreements

Between you and Hubspot, Inc.

The DPA is a contract between you and Hubspot, Inc. that has to be in place when processing personal data and transferring it Hubspot.



Last updated on 2023-09-07 by Openli



Data processing agreement

Comment

HubSpot Data Processing Agreement, attached.

Last Modified: September 1, 2023

More information here: <https://legal.hubspot.com/dpa>



Personal data

Used by Hubspot, Inc.

A description of the different categories of personal data and data subjects that Hubspot, Inc. is handling with the location of the Hubspot, Inc..



Last updated on 2023-06-19 by Openli



Ordinary data

Types of data

You may submit Personal Data to the Subscription Services, the extent of which is determined and controlled by you in your sole discretion, and which may include but is not limited to the following categories of Personal Data:

1. Contact Information (as defined in the General Terms).
2. Any other Personal Data submitted by, sent to, or received by you, or your end users, via the Subscription Service.

Subjects

You may submit Personal Data in the course of using the Subscription Service, the extent of which is determined and controlled by you in your sole discretion, and which may include, but is not limited to Personal Data relating to the following categories of Data Subjects:

Your Contacts and other end users including your employees, contractors, collaborators, customers, prospects, suppliers and subcontractors. Data Subjects may also include individuals attempting to communicate with or transfer Personal Data to your end users.

Purpose

We will Process Personal Data as necessary to provide the Subscription Services pursuant to the Agreement, as further specified in the Order Form, and as further instructed by you in your use of the Subscription Services.

Nature of processing

Personal Data will be Processed in accordance with the Agreement (including this DPA) and may be subject to the following Processing activities:

1. Storage and other Processing necessary to provide, maintain and improve the Subscription Services provided to you; and/or
2. Disclosure in accordance with the Agreement (including this DPA) and/or as compelled by applicable laws.



Data retention & deletion

By Pleaz ApS

Information about how long the data is kept for and when it's deleted.



Last updated on 2023-08-10 by Openli



Data retention & deletion policy

Description

Deletion or Return of Personal Data. Deletion or Return of Personal Data. We will delete or return all Customer Data, including Personal Data (including copies thereof) Processed pursuant to this DPA, on termination or expiration of your Subscription Service in accordance with the procedures set out in our Product Specific Terms. This term will apply except where we are required by applicable law to retain some or all of the Customer Data, or where we have archived Customer Data on back-up systems, which data we will securely isolate and protect from any further Processing and delete in accordance with our deletion practices. You may request the deletion of your HubSpot account after expiration or termination of your subscription by sending a request using our privacy request form at <https://preferences.hubspot.com/privacy>. (DPA: <https://legal.hubspot.com/dpa>)

More details at: <https://trust.hubspot.com/?hsCtaTracking=98c3bf73-03eb-4096-9ec7-dfb3078d4b63%7C3ecab3c5-8bc7-4fa6-91fe-9f0d1731cf4d&itemUid=af8eb7bc-d4b7-4e13-a4b7-6f05e2744c22&source=click> (Trust Center, Data Erasure Section)



Intercom

Vendor: Intercom R&D Unlimited Company

Customer service platform

Intercom

Website	https://www.intercom.com/
Country	IE
Address	2nd Floor, Stephen Court 18-21 St. Stephen's Green Dublin 2, Ireland

Privacy information

Privacy policy	https://www.intercom.com/legal/privacy
DPO contact details	legal@intercom.com
Privacy contact email	compliance@intercom.com
Privacy contact address	55 2nd Street, 4th Fl., San Francisco, CA 94105, USA, Attention: Compliance



Subprocessors

Used by Intercom R&D Unlimited Company

Subprocessors are companies that provide a service for Intercom R&D Unlimited Company and who has or potentially will get access to personal data of Intercom R&D Unlimited Company customers.

Last updated on 2023-05-08 by Openli



AWS (Amazon Web Services) hosting by Amazon Web Services, Inc.

Description	Purpose
AWS on-demand cloud computing platform & hosting	Hosting and storage. Location of Processing - Depending on the customer's hosting election: Ireland, United States, or Australia
Address	Processing locations
410 Terry Ave N, Seattle 98109, Washington, USA United States	Australia, Ireland, United States



Cloudflare by Cloudflare, Inc.

Description	Purpose
Cloud Service Provider	Provides Transport Layer Security ("TLS") protection for customers using a custom domain to host their Intercom Articles. Processing Locations - Depending on the customer's hosting election: Ireland, United States, or Australia.
Address	Processing locations
Cloudflare, Inc. 101 Townsend St. San Francisco, CA 94107 United States United States	Australia, Ireland, United States



Sparkpost by message Systems, Inc., d/b/a SparkPost

Description

Email Service Provider

Purpose

Message deliverability. Intercom uses Sparkpost to process email sent from Intercom. For EU hosting, Intercom relies on separate Sparkpost EU email infrastructure; however once an email is sent, it is considered data in transit over the (global) Internet and may be processed by email processing servers hosted globally. Sparkpost does not store the data, they only process it for sending. Processing Locations: Depending on the customer's hosting election United States or EU-region.

Address

7070 Samuel Morse Dr., Ste. 150 Columbia 21046 MD USA
United States

Processing locations

EU/EEA, United States



Snowflake by Snowflake Inc.

Description

cloud computing-based data warehousing company

Purpose

Data warehouse services. Location of Processing - Depending on the customer's hosting election: Ireland, United States, or Australia

Address

Snowflake Inc., Suite 3A, 106 East Babcock Street, Bozeman, Montana 59715
United States

Processing locations

Australia, Ireland, United States



Twilio by Twilio, Inc.

Description

Two-factor authentication

Purpose

SMS functionality - ONLY applicable if customers elect to use SMS as part of a feature where a bot can collect phone numbers from leads. If customers do not elect to use SMS as part of a feature where a bot can collect phone numbers from leads, Twilio, Inc. will not be leveraged to deliver any part of the service to them.

Address

101 Spear Street, Suite 300 San Francisco, CA 94105, United States
United States

Processing locations

United States



Processing locations

Used by Intercom R&D Unlimited Company

The location of the subprocessors that are processing data on behalf of Intercom R&D Unlimited Company. If data is sent outside the EEA there must be a legal basis for these transfers.

Last updated on 2022-11-28 by Openli

Location

Ireland



Security information & certifications

By Intercom R&D Unlimited Company

Statement or documentation of the security measures and practises Intercom R&D Unlimited Company has in place when handling personal data.

Last updated on 2023-08-11 by Openli

 ISO 27001

Statement

 Security information

Statement

An overview of Intercom's security measures can be found here: <https://www.intercom.com/security>

 Security statement

Statement

Penetration Testing Report & Remediations

 Security statement

Statement

ISO Statement of Applicability

 SOC 2

Statement



Data Transfers

By Intercom R&D Unlimited Company

The basis for Intercom R&D Unlimited Company transfers of personal data outside EEA. Vendors can also add a description of their own impact assessment for data transfers.

 Last updated on 2023-09-21 by Openli

 EU SCC (Standard contractual clauses)

Impact assessment

SCCs are incorporated in the DPA (<https://www.intercom.com/legal/data-processing-agreement>)

 TIA (Transfer Impact Assessment)

Impact assessment

Comprehensive questionnaire - which includes a transfer impact assessment

 UK Addendum (International Data Transfer Addendum)

Impact assessment

IDTA is incorporated into the DPA (<https://www.intercom.com/legal/data-processing-agreement>)



Data Processing Agreements

Between you and Intercom R&D Unlimited Company

The DPA is a contract between you and Intercom R&D Unlimited Company that has to be in place when processing personal data and transferring it Intercom.

 Last updated on 2023-02-08 by Openli



Data processing agreement

Comment

Intercom DPA can be found here: <https://www.intercom.com/legal/data-processing-agreement>



Personal data

Used by Intercom R&D Unlimited Company

A description of the different categories of personal data and data subjects that Intercom R&D Unlimited Company is handling with the location of the Intercom R&D Unlimited Company.



Last updated on 2023-02-08 by Openli



Ordinary data

Types of data

Any Customer Data processed by Intercom in connection with the Services and which could constitute any type of Personal Data included in chats or messages, including, without limitation, username, password, email address, IP address as well as customer attribute data, website page view data, click data and social media information.

Subjects

Prospects, customers, business partners and vendors of Customer (who are natural persons).

Purpose

Personal Data contained in Customer Data will be subject to the following basic processing activities:

Intercom provides a communication platform to facilitate interaction and engagement between the Customer and end users. This service will consist of providing a communication platform for the Customer to use in order to on-board and retain end users as well as analyze their use of the Customer's product and/or services.

Intercom will process personal data as necessary to provide the Services under the Agreement. Intercom does not sell Customer's Personal Data or Customer end users' Personal Data and does not share such end users' Personal Data with third parties for compensation or for those third parties' own business interests.

Nature of processing

Data retention & deletion

By Pleaz ApS

Information about how long the data is kept for and when it's deleted.



Last updated on 2023-08-10 by Openli



Data retention & deletion policy

Description

Upon termination or expiry of this Agreement, Intercom will (at Customer's election) delete or return to Customer all Customer Data (including copies) in its possession or control as soon as reasonably practicable and within a maximum period of 30 days of termination or expiry of the Agreement, save that this requirement will not apply to the extent that Intercom is required by applicable law to retain some or all of the Customer Data, or to Customer Data it has archived on back-up systems, which Customer Data Intercom will securely isolate and protect from any further processing, except to the extent required by applicable law.

More information here: <https://www.intercom.com/legal/data-processing-agreement>



Microsoft 365

Vendor: Microsoft Ireland Operations Limited

Microsoft platform. Includes Word, Excel, PowerPoint, OneNote, OneNote, OneDrive, Outlook, Teams



Microsoft 365

Website <https://www.office.com/>

Country IE

Address One Microsoft Place, South County Business Park, Leopardstown, Dublin 18 D18 P521 Ireland

Privacy information

Privacy policy <https://privacy.microsoft.com/en-gb/privacystatement>

Privacy contact address Microsoft Ireland Operations Limited, Attn: Data Protection Officer, One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland.

Additional privacy information

Data subjects may contact the data protection officer by filling out the webform at <https://aka.ms/privacyresponse>



Subprocessors

Used by Microsoft Ireland Operations Limited

Subprocessors are companies that provide a service for Microsoft Ireland Operations Limited and who has or potentially will get access to personal data of Microsoft Ireland Operations Limited customers.

Last updated on 2023-03-29 by Openli



Microsoft Subsidiary Affiliate Service by 3288212 Nova Scotia Limited

Description

Member of the Microsoft corporate group (affiliate) carrying out data-processing activities that involve access to customer data.

Purpose

The following Microsoft entity provides the datacenter infrastructure on which the Microsoft Online Services run. The data within datacenters is encrypted, and no personnel within the datacenters are permitted to access it.

Address

Canada

Processing locations

Canada



Accenture by Accenture International Limited

Description

Third-Party Service Provider

Purpose

The following organization provides contract staff who work in close coordination with Microsoft employees to operate, deliver and maintain the Microsoft Online Services. While doing so, the staff of this organizations may process Customer Data or Personal Data (consisting of pseudonymized personal identifiers) on our behalf.

Address

1 Grand Canal Square, Dublin, Ireland, D02 P820
Ireland

Processing locations

Ireland



Adjust Affiliate Service by Adjust Inc.

Description

Member of the Adjust GmbH corporate group (affiliate) carrying out data-processing activities that involve access to customer data.

Purpose

Data analytics for analysis of customer feature usage patterns. Applicable Online Service or Product: Outlook.

Address

United States

Processing locations

Germany, Netherlands, United States



Akamai CDN by Akamai Technologies, Inc.

Description

A content delivery network.

Purpose

Operating Content Delivery Network (CDN) infrastructure to efficiently deliver content. Processing Locations: Worldwide.

Address

145 Broadway Cambridge, MA 02142
United States

Processing locations

United States



Akvelon by Akvelon, Inc.

Description

Purpose

The following organization provides contract staff who work in close coordination with Microsoft employees to operate, deliver and maintain the Microsoft Online Services. While doing so, the staff of this organizations may process Customer Data or Personal Data (consisting of pseudonymized personal identifiers) on our behalf.

Address

3120 139th Avenue SE Ste 100 Bellevue WA 98005-4491 USA
United States

Processing locations

United States



Allegis by Allegis Group Holdings, Inc.

Description

Purpose

The following organization provides contract staff who work in close coordination with Microsoft employees to operate, deliver and maintain the Microsoft Online Services. While doing so, the staff of this organizations may process Customer Data or Personal Data (consisting of pseudonymized personal identifiers) on our behalf.

Address

United States

Processing locations

United States



Allyis by Allyis, Inc.

Description

Purpose

The following organization provides contract staff who work in close coordination with Microsoft employees to operate, deliver and maintain the Microsoft Online Services. While doing so, the staff of this organizations may process Customer Data or Personal Data (consisting of pseudonymized personal identifiers) on our behalf.

Address

United States

Processing locations

United States



Apex Systems by Apex Systems, LLC

Description

Purpose

The following organization provides contract staff who work in close coordination with Microsoft employees to operate, deliver and maintain the Microsoft Online Services. While doing so, the staff of this organizations may process Customer Data or Personal Data (consisting of pseudonymized personal identifiers) on our behalf.

Address

United States

Processing locations

United States



Atos by Atos It Solutions and Services, Inc.

Description

Purpose

The following organization provides contract staff who work in close coordination with Microsoft employees to operate, deliver and maintain the Microsoft Online Services. While doing so, the staff of this organizations may process Customer Data or Personal Data (consisting of pseudonymized personal identifiers) on our behalf.

Address

United States

Processing locations

United States



Beyondsoft Consulting by Beyondsoft Consulting, Inc

Description

Purpose

The following organization provides contract staff who work in close coordination with Microsoft employees to operate, deliver and maintain the Microsoft Online Services. While doing so, the staff of this organizations may process Customer Data or Personal Data (consisting of pseudonymized personal identifiers) on our behalf.

Address

Processing locations

United States



Blueprint Technologies by Blueprint Technologies, LLC

Description

Purpose

The following organization provides contract staff who work in close coordination with Microsoft employees to operate, deliver and maintain the Microsoft Online Services. While doing so, the staff of this organizations may process Customer Data or Personal Data (consisting of pseudonymized personal identifiers) on our behalf.

Address

United States

Processing locations

United States



Csi Interfusion by Csi Interfusion, Inc.

Description

Purpose

The following organization provides contract staff who work in close coordination with Microsoft employees to operate, deliver and maintain the Microsoft Online Services. While doing so, the staff of this organizations may process Customer Data or Personal Data (consisting of pseudonymized personal identifiers) on our behalf.

Address

11808 Northup Way Bellevue WA 98005-1944 USA
United States

Processing locations

United States



Databricks by Databricks, Inc.

Description

Unified platform for data and AI

Purpose

Deploying, operating, and troubleshooting Azure Databricks. Azure Databricks (Microsoft Teams utilizes Azure Databricks)

Address

60 Spear Street, 13th Floor San Francisco, CA 94105 1-866-330-0121, United States
United States

Processing locations

Canada, France, Germany, Netherlands, United Kingdom, United States



Dxc Technology by DXC Technology Company LLC

Description

Purpose

The following organization provides contract staff who work in close coordination with Microsoft employees to operate, deliver and maintain the Microsoft Online Services. While doing so, the staff of this organization may process Customer Data or Personal Data (consisting of pseudonymized personal identifiers) on our behalf.

Address

United States

Processing locations

United States



E-Search by E-Search

Description

Purpose

The following organization provides contract staff who work in close coordination with Microsoft employees to operate, deliver and maintain the Microsoft Online Services. While doing so, the staff of this organization may process Customer Data or Personal Data (consisting of pseudonymized personal identifiers) on our behalf.

Address

Bulevar Mihaila Pupina 10Z/IV Beograd, Serbia 11070
Serbia

Processing locations

Serbia



Harman Connected Services by Harman Connected Services, Inc.

Description

Purpose

The following organization provides contract staff who work in close coordination with Microsoft employees to operate, deliver and maintain the Microsoft Online Services. While doing so, the staff of this organization may process Customer Data or Personal Data (consisting of pseudonymized personal identifiers) on our behalf.

Address

United States

Processing locations

United States



HCL America, Inc. by HCL America Solutions Inc

Description

Purpose

The following organization provides contract staff who work in close coordination with Microsoft employees to operate, deliver and maintain the Microsoft Online Services. While doing so, the staff of this organization may process Customer Data or Personal Data (consisting of pseudonymized personal identifiers) on our behalf.

Address

Processing locations

United States



Hi-Tech Talents by Hi-Tech Talents LLC

Description

Purpose

The following organization provides contract staff who work in close coordination with Microsoft employees to operate, deliver and maintain the Microsoft Online Services. While doing so, the staff of this organization may process Customer Data or Personal Data (consisting of pseudonymized personal identifiers) on our behalf.

Address

1530 140th Avenue NE Bellevue WA 98005-4574 USA
United States

Processing locations

United States



Infosys by Infosys Limited

Description

Technical Support

Purpose

The following organization provides contract staff who work in close coordination with Microsoft employees to operate, deliver and maintain the Microsoft Online Services. While doing so, the staff of this organization may process Customer Data or Personal Data (consisting of pseudonymized personal identifiers) on our behalf.

Address

2400 N Glenville Dr Suite C150 Richardson TX 75082 United States
United States

Processing locations

United States



Insight Global, Inc. by Insight Global

Description

Purpose

The following organization provides contract staff who work in close coordination with Microsoft employees to operate, deliver and maintain the Microsoft Online Services. While doing so, the staff of this organization may process Customer Data or Personal Data (consisting of pseudonymized personal identifiers) on our behalf.

Address

4170 Ashford Dunwoody Road Suite 25 Atlanta, GA 30319-1442 USA
United States

Processing locations

United States



LatentView by Latentview Analytics Corporation

Description

Purpose

United States The following organization provides contract staff who work in close coordination with Microsoft employees to operate, deliver and maintain the Microsoft Online Services. While doing so, the staff of this organization may process Customer Data or Personal Data (consisting of pseudonymized personal identifiers) on our behalf.

Address

United States

Processing locations

United States



Expertis by Manpower Group

Description

Purpose

The following organization provides contract staff who work in close coordination with Microsoft employees to operate, deliver and maintain the Microsoft Online Services. While doing so, the staff of this organization may process Customer Data or Personal Data (consisting of pseudonymized personal identifiers) on our behalf.

Address

29973 Network Place Chicago, IL 60673-1299 USA
United States

Processing locations

United States



Maq Software by Maq LLC

Description

Purpose

The following organization provides contract staff who work in close coordination with Microsoft employees to operate, deliver and maintain the Microsoft Online Services. While doing so, the staff of this organization may process Customer Data or Personal Data (consisting of pseudonymized personal identifiers) on our behalf.

Address

United States

Processing locations

United States



Matchpoint It by Matchpoint It Ltd.

Description

Purpose

The following organization provides contract staff who work in close coordination with Microsoft employees to operate, deliver and maintain the Microsoft Online Services. While doing so, the staff of this organization may process Customer Data or Personal Data (consisting of pseudonymized personal identifiers) on our behalf.

Address

Israel

Processing locations

Israel



Microsoft Subsidiary Affiliate Service by Microsoft 1968 South Africa (Pty) Limited

Description

Member of the Microsoft corporate group (affiliate) carrying out data-processing activities that involve access to customer data.

Purpose

The following Microsoft entity provides the datacenter infrastructure on which the Microsoft Online Services run. The data within datacenters is encrypted, and no personnel within the datacenters are permitted to access it.

Address

South Africa

Processing locations

South Africa



Microsoft Subsidiary Affiliate Service by Microsoft 1985 France SARL

Description

Member of the Microsoft corporate group (affiliate) carrying out data-processing activities that involve access to customer data.

Purpose

The following Microsoft entity provides the datacenter infrastructure on which the Microsoft Online Services run. The data within datacenters is encrypted, and no personnel within the datacenters are permitted to access it.

Address

France

Processing locations

France

 Microsoft Subsidiary Affiliate Service by Microsoft 4772 Israel Ltd.	
Description 	Purpose The following Microsoft entity provides the datacenter infrastructure on which the Microsoft Online Services run. The data within datacenters is encrypted, and no personnel within the datacenters are permitted to access it.
Address Israel	Processing locations Israel
 Microsoft Subsidiary Affiliate Service by Microsoft 4825 Italy S.R.L.	
Description 	Purpose The following Microsoft entity provides the datacenter infrastructure on which the Microsoft Online Services run. The data within datacenters is encrypted, and no personnel within the datacenters are permitted to access it.
Address Italy	Processing locations Italy
 Microsoft Subsidiary Affiliate Service by Microsoft 5673 Korea Yuhan Chaegim Hoesa	
Description 	Purpose The following Microsoft entity provides the datacenter infrastructure on which the Microsoft Online Services run. The data within datacenters is encrypted, and no personnel within the datacenters are permitted to access it.
Address Korea, Republic of	Processing locations Korea, Republic of
 Microsoft Subsidiary Affiliate Service by Microsoft 7282 Qatar QFZ LLC	
Description 	Purpose The following Microsoft entity provides the datacenter infrastructure on which the Microsoft Online Services run. The data within datacenters is encrypted, and no personnel within the datacenters are permitted to access it.
Address Qatar	Processing locations Qatar
 Microsoft Subsidiary Affiliate Service by Microsoft (China) Company Limited	
Description Member of the Microsoft corporate group (affiliate) carrying out data-processing activities that involve access to customer data.	Purpose The following Microsoft entity provides the datacenter infrastructure on which the Microsoft Online Services run. The data within datacenters is encrypted, and no personnel within the datacenters are permitted to access it.
Address China	Processing locations China



Microsoft by Microsoft Corporation

Description

technology company

Purpose

The following Microsoft entity provides the datacenter infrastructure on which the Microsoft Online Services run. The data within datacenters is encrypted, and no personnel within the datacenters are permitted to access it.

Address

One Microsoft Way, Redmond, WA 98052, United States
United States

Processing locations

United States



Microsoft Subsidiary Affiliate Service by Microsoft Corporation (Abu Dhabi branch)

Description

Member of the Microsoft corporate group (affiliate) carrying out data-processing activities that involve access to customer data.

Purpose

The following Microsoft entity provides the datacenter infrastructure on which the Microsoft Online Services run. The data within datacenters is encrypted, and no personnel within the datacenters are permitted to access it.

Address

United Arab Emirates

Processing locations

United Arab Emirates



Microsoft Subsidiary Affiliate Service by Microsoft Corporation (India) Pvt Ltd

Description

Member of the Microsoft corporate group (affiliate) carrying out data-processing activities that involve access to customer data.

Purpose

The following Microsoft entity provides the datacenter infrastructure on which the Microsoft Online Services run. The data within datacenters is encrypted, and no personnel within the datacenters are permitted to access it.

Address

India

Processing locations

India



Microsoft Subsidiary Affiliate Service by Microsoft Datacenter (Australia) Pty Limited

Description

Member of the Microsoft corporate group (affiliate) carrying out data-processing activities that involve access to customer data.

Purpose

The following Microsoft entity provides the datacenter infrastructure on which the Microsoft Online Services run. The data within datacenters is encrypted, and no personnel within the datacenters are permitted to access it.

Address

Australia

Processing locations

Australia



Microsoft Subsidiary Affiliate Service by Microsoft Datacenter (Austria) GmbH

Description

Member of the Microsoft corporate group (affiliate) carrying out data-processing activities that involve access to customer data.

Purpose

The following Microsoft entity provides the datacenter infrastructure on which the Microsoft Online Services run. The data within datacenters is encrypted, and no personnel within the datacenters are permitted to access it.

Address

Austria

Processing locations

Austria



Microsoft Subsidiary Affiliate Service by Microsoft Datacenter Chile S.A.

Description

Member of the Microsoft corporate group (affiliate) carrying out data-processing activities that involve access to customer data.

Purpose

The following Microsoft entity provides the datacenter infrastructure on which the Microsoft Online Services run. The data within datacenters is encrypted, and no personnel within the datacenters are permitted to access it.

Address

Chile

Processing locations

Chile



Microsoft Subsidiary Affiliate Service by Microsoft Datacenter Holdings (HK) Limited

Description

Member of the Microsoft corporate group (affiliate) carrying out data-processing activities that involve access to customer data.

Purpose

The following Microsoft entity provides the datacenter infrastructure on which the Microsoft Online Services run. The data within datacenters is encrypted, and no personnel within the datacenters are permitted to access it.

Address

Hong Kong

Processing locations

Hong Kong



Microsoft Subsidiary Affiliate Service by Microsoft Datacenter Netherlands B.V.

Description

Member of the Microsoft corporate group (affiliate) carrying out data-processing activities that involve access to customer data.

Purpose

The following Microsoft entity provides the datacenter infrastructure on which the Microsoft Online Services run. The data within datacenters is encrypted, and no personnel within the datacenters are permitted to access it.

Address

Netherlands

Processing locations

Netherlands



Microsoft Subsidiary Affiliate Service by Microsoft Datacenter Norway AS

Description

Member of the Microsoft corporate group (affiliate) carrying out data-processing activities that involve access to customer data.

Purpose

The following Microsoft entity provides the datacenter infrastructure on which the Microsoft Online Services run. The data within datacenters is encrypted, and no personnel within the datacenters are permitted to access it.

Address

Norway

Processing locations

Norway



Microsoft Subsidiary Affiliate Service by Microsoft Deutschland MCIO GmbH

Description

Member of the Microsoft corporate group (affiliate) carrying out data-processing activities that involve access to customer data.

Purpose

The following Microsoft entity provides the datacenter infrastructure on which the Microsoft Online Services run. The data within datacenters is encrypted, and no personnel within the datacenters are permitted to access it.

Address

Germany

Processing locations

Germany



Microsoft Subsidiary Affiliate Service by Microsoft do Brasil Importação e Comércio de Software e Vídeo Games LTDA

Description

Member of the Microsoft corporate group (affiliate) carrying out data-processing activities that involve access to customer data.

Purpose

The following Microsoft entity provides the datacenter infrastructure on which the Microsoft Online Services run. The data within datacenters is encrypted, and no personnel within the datacenters are permitted to access it.

Address

Brazil

Processing locations

Brazil



Microsoft by Microsoft Ireland Operations Limited

Description

Cloud, computers, apps and gaming provider

Purpose

The following Microsoft entity provides the datacenter infrastructure on which the Microsoft Online Services run. The data within datacenters is encrypted, and no personnel within the datacenters are permitted to access it.

Address

One Microsoft Place, South County Business Park, Leopardstown, Dublin 18 D18 P521 Ireland
Ireland

Processing locations

Ireland



Microsoft Subsidiary Affiliate Service by Microsoft Japan Co., Ltd.

Description

Member of the Microsoft corporate group (affiliate) carrying out data-processing activities that involve access to customer data.

Purpose

The following Microsoft entity provides the datacenter infrastructure on which the Microsoft Online Services run. The data within datacenters is encrypted, and no personnel within the datacenters are permitted to access it.

Address

Member of the Microsoft corporate group (affiliate) carrying out data-processing activities that involve access to customer data.
Japan

Processing locations

Japan



Microsoft Subsidiary Affiliate Service by Microsoft MCIO Schweiz GmbH

Description

Member of the Microsoft corporate group (affiliate) carrying out data-processing activities that involve access to customer data.

Purpose

The following Microsoft entity provides the datacenter infrastructure on which the Microsoft Online Services run. The data within datacenters is encrypted, and no personnel within the datacenters are permitted to access it.

Address

Switzerland

Processing locations

Switzerland



Microsoft Subsidiary Affiliate Service by Microsoft Operations 38224 FZE

Description

Member of the Microsoft corporate group (affiliate) carrying out data-processing activities that involve access to customer data.

Purpose

The following Microsoft entity provides the datacenter infrastructure on which the Microsoft Online Services run. The data within datacenters is encrypted, and no personnel within the datacenters are permitted to access it.

Address

United Arab Emirates

Processing locations

United Arab Emirates



Microsoft Subsidiary Affiliate Service by Microsoft Operations Pte Ltd

Description

Member of the Microsoft corporate group (affiliate) carrying out data-processing activities that involve access to customer data.

Purpose

Singapore The following Microsoft entity provides the datacenter infrastructure on which the Microsoft Online Services run. The data within datacenters is encrypted, and no personnel within the datacenters are permitted to access it.

Address

Singapore

Processing locations

Singapore



Microsoft Subsidiary Affiliate Service by Microsoft Operations Puerto Rico, LLC

Description

Purpose

The following Microsoft entity provides the datacenter infrastructure on which the Microsoft Online Services run. The data within datacenters is encrypted, and no personnel within the datacenters are permitted to access it.

Address

United States

Processing locations

United States



Microsoft Subsidiary Affiliate Service by Microsoft Operations Taiwan Limited

Description

Purpose

The following Microsoft entity provides the datacenter infrastructure on which the Microsoft Online Services run. The data within datacenters is encrypted, and no personnel within the datacenters are permitted to access it.

Address

Taiwan

Processing locations

Taiwan



Microsoft Subsidiary Affiliate Service by Microsoft Oy

Description

Member of the Microsoft corporate group (affiliate) carrying out data-processing activities that involve access to customer data.

Purpose

The following Microsoft entity provides the datacenter infrastructure on which the Microsoft Online Services run. The data within datacenters is encrypted, and no personnel within the datacenters are permitted to access it.

Address

Finland

Processing locations

Finland



Microsoft Subsidiary Affiliate Service by Microsoft Payments (Malaysia) Sdn Bhd

Description

Member of the Microsoft corporate group (affiliate) carrying out data-processing activities that involve access to customer data.

Purpose

The following Microsoft entity provides the datacenter infrastructure on which the Microsoft Online Services run. The data within datacenters is encrypted, and no personnel within the datacenters are permitted to access it.

Address

Malaysia

Processing locations

Malaysia

 Microsoft Subsidiary Affiliate Service by Microsoft Poland Operations Sp.z o.o.	
Description	Purpose The following Microsoft entity provides the datacenter infrastructure on which the Microsoft Online Services run. The data within datacenters is encrypted, and no personnel within the datacenters are permitted to access it.
Address Poland	Processing locations Poland
 Microsoft Subsidiary Affiliate Service by Microsoft RL Unlimited Company	
Description	Purpose The following Microsoft entity provides the datacenter infrastructure on which the Microsoft Online Services run. The data within datacenters is encrypted, and no personnel within the datacenters are permitted to access it.
Address Microsoft Subsidiary Affiliate Service Ireland	Processing locations Ireland
 Microsoft Subsidiary Affiliate Service by Microsoft Sweden 1172 AB	
Description	Purpose The following Microsoft entity provides the datacenter infrastructure on which the Microsoft Online Services run. The data within datacenters is encrypted, and no personnel within the datacenters are permitted to access it.
Address Sweden	Processing locations Sweden
 Mindtree by Mindtree Ltd.	
Description	Purpose The following organization provides contract staff who work in close coordination with Microsoft employees to operate, deliver and maintain the Microsoft Online Services. While doing so, the staff of this organization may process Customer Data or Personal Data (consisting of pseudonymized personal identifiers) on our behalf.
Address	Processing locations India
 Microsoft Subsidiary Affiliate Service by MSFT MCIO Limited.	
Description	Purpose The following Microsoft entity provides the datacenter infrastructure on which the Microsoft Online Services run. The data within datacenters is encrypted, and no personnel within the datacenters are permitted to access it.
Address United Kingdom	Processing locations United Kingdom



Mu Sigma by Mu Sigma Business Solutions, LLC

Description

Purpose

The following organization provides contract staff who work in close coordination with Microsoft employees to operate, deliver and maintain the Microsoft Online Services. While doing so, the staff of this organization may process Customer Data or Personal Data (consisting of pseudonymized personal identifiers) on our behalf.

Address

3400 Dundee Road Suite 160 Northbrook, IL 60062-3400 USA
United States

Processing locations

United States



Pactera by Pactera Technologies, Inc.

Description

Purpose

The following organization provides contract staff who work in close coordination with Microsoft employees to operate, deliver and maintain the Microsoft Online Services. While doing so, the staff of this organization may process Customer Data or Personal Data (consisting of pseudonymized personal identifiers) on our behalf.

Address

United States

Processing locations

United States



Interana by Scuba Analytics Inc.

Description

Intelligence platform designed to unify customer experience management

Purpose

Customer experience (CX) analytics. Applicable Online Service or Product: Teams, Stream, SharePoint Online, OneDrive for Business.

Address

United States

Processing locations

United States



Wicresoft by Shanghai Wicresoft Co, Ltd.

Description

Purpose

The following organization provides contract staff who work in close coordination with Microsoft employees to operate, deliver and maintain the Microsoft Online Services. While doing so, the staff of this organization may process Customer Data or Personal Data (consisting of pseudonymized personal identifiers) on our behalf.

Address

No.1000, Zixing Road, Wujing Town, Minhang District Shanghai, Shanghai, 200241
China
China

Processing locations

China



Slalom by Slalom Consulting

Description

Purpose

The following organization provides contract staff who work in close coordination with Microsoft employees to operate, deliver and maintain the Microsoft Online Services. While doing so, the staff of this organization may process Customer Data or Personal Data (consisting of pseudonymized personal identifiers) on our behalf.

Address

Processing locations

United States



Snowflake by Snowflake Inc.

Description

cloud computing-based data warehousing company

Purpose

Data warehousing. Applicable Online Service or Product: Microsoft Yammer.

Address

Snowflake Inc., Suite 3A, 106 East Babcock Street, Bozeman, Montana 59715
United States

Processing locations

United States



Kartopia by Sonata Software Ltd.

Description

Purpose

The following organization provides contract staff who work in close coordination with Microsoft employees to operate, deliver and maintain the Microsoft Online Services. While doing so, the staff of this organization may process Customer Data or Personal Data (consisting of pseudonymized personal identifiers) on our behalf.

Address

Processing locations

India



Tata Consultancy Services by Tata Consultancy Services Limited

Description

Purpose

The following organization provides contract staff who work in close coordination with Microsoft employees to operate, deliver and maintain the Microsoft Online Services. While doing so, the staff of this organization may process Customer Data or Personal Data (consisting of pseudonymized personal identifiers) on our behalf.

Address

5th Floor,2 Derry Street London W8 5TT United Kingdom
United Kingdom

Processing locations

United States



Tech Mahindra Limited by Tech Mahindra Limited

Description

Purpose

The following organization provides contract staff who work in close coordination with Microsoft employees to operate, deliver and maintain the Microsoft Online Services. While doing so, the staff of this organization may process Customer Data or Personal Data (consisting of pseudonymized personal identifiers) on our behalf.

Address

Processing locations

United States



Teleion by Teleion Consulting, LLC

Description

Purpose

The following organization provides contract staff who work in close coordination with Microsoft employees to operate, deliver and maintain the Microsoft Online Services. While doing so, the staff of this organization may process Customer Data or Personal Data (consisting of pseudonymized personal identifiers) on our behalf.

Address

1000 Dexter Avenue N. Suite 520 Seattle WA 98109-3581 USA
United States

Processing locations

United States



Telus by TELUS International AI Inc.

Description

Technical support

Purpose

The following organization provides contract staff who work in close coordination with Microsoft employees to operate, deliver and maintain the Microsoft Online Services. While doing so, the staff of this organizations may process Customer Data or Personal Data (consisting of pseudonymized personal identifiers) on our behalf.

Address

510 West Georgia Street 7th Floor Vancouver, BC V6B 0M3 Canada
Canada

Processing locations

United States



Valorem Consulting Group by Valorem, LLC

Description

Purpose

The following organization provides contract staff who work in close coordination with Microsoft employees to operate, deliver and maintain the Microsoft Online Services. While doing so, the staff of this organization may process Customer Data or Personal Data (consisting of pseudonymized personal identifiers) on our behalf.

Address

2101 Broadway Street Suite 11 Kansas City, MO 64108-2167 USA
United States

Processing locations

United States



Verizon by Verizon Communications Inc.

Description

Content Delivery Network

Purpose

Entity Name: Edgecast Networks, Inc. Operating Content Delivery Network (CDN) infrastructure to efficiently deliver content. Processing Locations: Worldwide.

Address

United States

Processing locations

United States



Wipro by Wipro Limited

Description

Purpose

The following organization provides contract staff who work in close coordination with Microsoft employees to operate, deliver and maintain the Microsoft Online Services. While doing so, the staff of this organization may process Customer Data or Personal Data (consisting of pseudonymized personal identifiers) on our behalf.

Address

Sy. No. 76P-80P Bengaluru, KA 560035 India
India

Processing locations

India



Processing locations

Used by Microsoft Ireland Operations Limited

The location of the subprocessors that are processing data on behalf of Microsoft Ireland Operations Limited. If data is sent outside the EEA there must be a legal basis for these transfers.

Last updated on 2022-11-28 by Openli

Location

Ireland



Security information & certifications

Office 365 By Microsoft Ireland Operations Limited

Statement or documentation of the security measures and practises Microsoft Ireland Operations Limited has in place when handling personal data.

Last updated on 2023-03-29 by Openli

ISO 27001

Statement

Office 365 - ISO 27001_2013 Certificate (2021-2024). Title: Office 365 - ISO 27001_2013 Certificate (2021-2024)

You can upload the certificate via your account: <https://servicetrust.microsoft.com/viewpage/ISOIEC>

More information: <https://docs.microsoft.com/en-us/compliance/regulatory/offering-iso-27001>

ISO 27017

Statement

Office 365 - ISO 27017:2015 Certificate (2021-2024). Title: Office 365 - ISO 27017:2015 Certificate (2021-2024)

You can upload the certificate via your account: <https://servicetrust.microsoft.com/viewpage/ISOIEC>

More information: <https://learn.microsoft.com/en-us/compliance/regulatory/offering-iso-27017>

ISO 27018

Statement

Office 365 - ISO 27018_2019 Certificate (2021 - 2024). Title: Office 365 - ISO 27018_2019 Certificate (2021 - 2024).

You can upload the certificate via your account: <https://servicetrust.microsoft.com/viewpage/ISOIEC>

More information: <https://learn.microsoft.com/en-us/compliance/regulatory/offering-iso-27018>

ISO 27701

Statement

Office 365 - ISO 27701:2019 Certificate (2021-2024). Title: Office 365 - ISO 27701:2019 Certificate (2021-2024)

You can upload the certificate via your account: <https://servicetrust.microsoft.com/viewpage/ISOIEC>

More information: <https://learn.microsoft.com/en-us/compliance/regulatory/offering-iso-27701>

Security information

Statement

Office 365 - ISO 22301:2019 Certificate (2021-2024). Title: Office 365 - ISO 22301:2019 Certificate (2021-2024)

You can upload the certificate via your account: <https://servicetrust.microsoft.com/viewpage/ISOIEC>

More information: <https://learn.microsoft.com/en-us/compliance/regulatory/offering-iso-22301>

Security information

Statement

Azure, Dynamics 365, and Microsoft 365 compliance offerings Information for Azure, Dynamics 365, Microsoft 365, and Power Platform, and other services to help with national, regional, and industry-specific regulations for data collection and use via this link: <https://learn.microsoft.com/da-dk/compliance/regulatory/offering-home>

SOC 1

Statement

Microsoft 365 Central Services - SSAE 18 SOC 1 Report (2022) - (October 1, 2021 through September 30, 2022) - Click-through and Microsoft 365 Microservices T2 - SSAE 18 SOC 1 Type 2 (2022) - (October 1, 2021 through September 30, 2022).

You can upload the certificate via your account: <https://servicetrust.microsoft.com/viewpage/SOC>

More information: <https://docs.microsoft.com/en-us/compliance/regulatory/offering-soc-1>

SOC 2

Statement

Microsoft 365 Central Services - SSAE 18 SOC 2 Report (2022) - (October 1, 2021 through September 30, 2022); Microsoft 365 Microservices T1 - SSAE 18 SOC 2 Type 1 (2022) - (October 1, 2021 through September 30, 2022) and Microsoft 365 Microservices T2 - SSAE 18 SOC 2 Type 2 (2022) - (October 1, 2021 through September 30, 2022).

You can upload the certificate via your account: <https://servicetrust.microsoft.com/viewpage/SOC>

More information: <https://docs.microsoft.com/en-us/compliance/regulatory/offering-soc-2>

SOC 3

Statement

Microsoft 365 Central Services - SSAE 18 SOC 3 Report (2022) - (October 1, 2021 through September 30, 2022).

You can upload the certificate via your account: <https://servicetrust.microsoft.com/viewpage/SOC>

More information: <https://docs.microsoft.com/en-us/compliance/regulatory/offering-soc-3>



Data Transfers

Office 365 By Microsoft Ireland Operations Limited

The basis for Microsoft Ireland Operations Limited transfers of personal data outside EEA. Vendors can also add a description of their own impact assessment for data transfers.

 Last updated on 2023-09-21 by Openli



EU SCC (Standard contractual clauses)

Impact assessment

Microsoft General - International Data Transfer Addendum to Standard Contractual Clauses (Microsoft P2P) (3.21.2022)

Description: International Data Transfer Addendum to Standard Contractual Clauses (Microsoft P2P) (3.21.2022)

Can be found here and uploaded via your account: <https://servicetrust.microsoft.com/viewpage/GDPR>



TIA (Transfer Impact Assessment)

Impact assessment

Data Protection Impact Assessments: Guidance for Data Controllers Using Microsoft Office 365. Link to the guide: <https://learn.microsoft.com/en-us/compliance/regulatory/gdpr-dpia-office365?view=o365-worldwide>



Transfer information

Impact assessment

Overview of the EU Data Boundary for 365: <https://learn.microsoft.com/en-us/privacy/eudb/eu-data-boundary-learn#overview-of-the-eu-data-boundary>



Transfer information

Impact assessment

For Dynamics 365 and Power Platform, the geographic area (Geo) in which a customer's services tenancy is hosted is determined by billing address. Customers can configure their services to be in-scope for the EU Data Boundary by provisioning their tenant and all Dynamics 365 and Power Platform environments in an EU Datacenter Location. The Geo of a customer's tenant is determined by billing address, and customers can select the Geo where data will reside when they create their environment. For more information, see [Create a new environment](#) and [Create and manage environments in the Power Platform admin center](#).



Transfer information

Impact assessment

Transfer information:

<https://learn.microsoft.com/en-us/privacy/eudb/eu-data-boundary-transfers-for-all-services?source=recommendations>



Transfer information

Impact assessment

Law Enforcement Requests Report: <https://www.microsoft.com/en-us/corporate-responsibility/law-enforcement-requests-report>



Transfer information

Impact assessment

Locations of Microsoft Online Services Personnel with Remote Access to Data.

Available via this link: <https://learn.microsoft.com/en-gb/microsoft-365/enterprise/personnel-loc/m365-personnel-location?view=o365-worldwide>



Transfer information

Impact assessment

GDPR White Paper



Data Processing Agreements

Office 365 Between you and Microsoft Ireland Operations Limited

The DPA is a contract between you and Microsoft Ireland Operations Limited that has to be in place when processing personal data and transferring it Microsoft 365.

Last updated on 2023-03-29 by Openli



Data processing agreement

Comment

DPA can be found here : <https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA>

Microsoft Product and Services Data Protection Addendum (WW), January 2023, attached.



Personal data

Office 365 Used by Microsoft Ireland Operations Limited

A description of the different categories of personal data and data subjects that Microsoft Ireland Operations Limited is handling with the location of the Microsoft Ireland Operations Limited.

Last updated on 2023-01-19 by Openli



Ordinary data

Types of data

See their data collection: <https://privacy.microsoft.com/en-GB/data-collection-d365>

Subjects

See their data collection: <https://privacy.microsoft.com/en-GB/data-collection-d365>

Purpose

See their data collection: <https://privacy.microsoft.com/en-GB/data-collection-d365>

Nature of processing



TwentyThree

Vendor: TwentyThree Aps

The Video Marketing Platform



TwentyThree

Website	https://www.twentythree.com/
Country	DK
Address	Sortedam Dossering 5D 2200 Copenhagen N Denmark

Privacy information

Privacy policy	https://www.twentythree.com/policies-download/TwentyThree,%20Privacy%20and%20Cookie%20Policy.pdf
Privacy contact email	privacy@twentythree.com



Subprocessors

Used by TwentyThree Aps

Subprocessors are companies that provide a service for TwentyThree Aps and who has or potentially will get access to personal data of TwentyThree Aps customers.

Last updated on 2023-08-11 by Openli



AWS (Amazon Web Services) hosting by Amazon Web Services EMEA SARL

Description	Purpose
Hosting of data	Amazon Data Services Ireland Limited (AWS) delivers services that are part of the Service offering. AWS serves as the primary hosting platform for pages, videos, webinars, databases and other platform components. This also includes video transcription, DNS services for resolution of domain names and along with the processing and delivery of both transactional and marketing email from the service. AWS is used for data backups, including of personal data, from the Service.
Address	Processing locations
38 Avenue John F. Kennedy, L-1855 Luxembourg, Luxembourg. Luxembourg	Ireland

Amplitude by Amplitude, Inc

Description	Purpose
visualize data	Amplitude is used to compile usage analytics for the service in order to improve the user experience. Amplitude processes personal data of logged-in users including name, email address, title and product usage.
Address	Processing locations
631 Howard Street, Floor 5, San Francisco, CA 94105, United States United States	United States

Description

Content Delivery Network

Purpose

Fastly, Inc provides content distribution and encryption certificates for traffic transmitted to and from the Service. To optimize performance of this delivery Fastly caches content on its servers, but neither personal data nor other content is stored permanently by Fastly.

Address

475 Brannan Street Suite 300 San Francisco, CA 94107 United States
United States

Processing locations

United States



Description

Error Tracking

Purpose

Functional Software Inc. (Sentry) is a debugging and support tool used by TwentyThree to collect automated error reporting for users logged in to the platform. This allows us to capture more details about user-facing issue and to resolve such issues more expediently. To serve this purpose, Sentry compiles and stores detailed error information.

Address

Functional Software, Inc. dba Sentry, 45 Fremont Street, 8th Floor, San Francisco, CA 94105.
United States

Processing locations

United States



Description

cloud computing service

Purpose

Service from Google Ireland Limited (Google Cloud) are used to transcribe and translate videos.

Address

Gordon House, Barrow Street, Dublin 4 Ireland
Ireland

Processing locations

Ireland



Description

Marketing automation platform

Purpose

HubSpot, Inc is used to collect usage analytics for users logged into the Service. HubSpot is also used for both chat and email conversations with the TwentyThree team. HubSpot processes personal data of logged-in users including name, email address, title, browsing activity and any email and/or chat conversation.

Address

25 First Street, 2nd Floor Cambridge, MA 02141 United States
United States

Processing locations

United States



Planhat by Planhat AB

Description

Customer success platform

Purpose

Planhat AB is used to collect usage analytics for customers logged into the Service in order to improve the user experience. Planhat processes personal data of logged-in users including name, email address, title, browsing activity and any email and/or chat conversation.

Address

c/o WeWork, Regeringsgatan 29, 111 53 Stockholm, Sweden
Sweden

Processing locations

Sweden



Segment by Segment.io, Inc. (acquired by Twilio, Inc)

Description

Customer data platform (CDP) that helps collect, clean, and control customer data

Purpose

Segment.io, Inc is used to collect usage analytics for customers logged into the Service in order to improve the user experience. Segment processes personal data of logged-in users including name, email address, title and product

Address

101 Spear Street, Fl 1 San Francisco, CA 94105
United States

Processing locations

United States



Stripe by Stripe Payments Europe, Ltd

Description

Software to accept payments and manage companies' businesses online.

Purpose

Stripe Payments Europe, Ltd is the payment provider used by TwentyThree to process credit cards payments from its customers. Stripe processes personal data of the person paying for a subscribing including names, email, company name and credit card number.

Address

The One Building, Lower Grand Canal St, Dublin 2, Ireland, registration number
513174
Ireland

Processing locations

Ireland



Twilio by Twilio, Inc.

Description

Two-factor authentication

Purpose

Twilio, Inc as a part of TwentyThree infrastructure between broadcasters and presenters. Twilio's network is used for signaling and connection establishment between parties, but is not used to deliver video to viewers.

Address

101 Spear Street, Suite 300 San Francisco, CA 94105, United States
United States

Processing locations

United States



Userflow by Userflow Inc.

Description

Userflow is an onboarding software used to create product introductions.

Purpose

Userflow is an onboarding software used to create product introductions. Userflow processes personal data of logged-in users including name, email address, title and product usage.

Address

548 Market St PMB 69598, San Francisco, CA 94104-5401, USA
United States

Processing locations

United States

23 Processing locations

Used by TwentyThree Aps

The location of the subprocessors that are processing data on behalf of TwentyThree Aps. If data is sent outside the EEA there must be a legal basis for these transfers.

Last updated on 2022-11-28 by Openli

Location

Denmark

23 Security information & certifications

By TwentyThree Aps

Statement or documentation of the security measures and practises TwentyThree Aps has in place when handling personal data.

Last updated on 2023-08-11 by Openli

Security information

Statement

January 2022 ISAE 3000 Report attached.

23 Data Transfers

By TwentyThree Aps

The basis for TwentyThree Aps transfers of personal data outside EEA. Vendors can also add a description of their own impact assessment for data transfers.

Last updated on 2023-09-21 by Openli

EU SCC (Standard contractual clauses)

Impact assessment

DPA 7.5

'The Data Processor must enter into a written agreement with each Subprocessor to ensure the processing of Personal Data in accordance with the GDPR, which can include the use of Standard Contractual Clauses. These agreements shall impose on the Subprocessor similar GDPR compliance obligations as the Data Processor (including those under this Agreement).'

23 Data Processing Agreements

Between you and TwentyThree Aps

The DPA is a contract between you and TwentyThree Aps that has to be in place when processing personal data and transferring it TwentyThree.

Last updated on 2021-10-07 by Openli



Data processing agreement

Comment

DPA Link - <https://www.twentythree.com/policies-download/TwentyThree.%20Data%20Processing%20Agreement.pdf>



Personal data

Used by TwentyThree Aps

A description of the different categories of personal data and data subjects that TwentyThree Aps is handling with the location of the TwentyThree Aps.



Last updated on 2021-11-23 by Openli



Ordinary data

Types of data

Sensitive Information

Subjects

In the usage of the Site, TwentyThree will not collect, store nor use sensitive personal information such as credit or debit card numbers, personal financial account information, Social Security numbers, passport numbers, driver's license numbers or similar personal identifiers, racial or ethnic origin, physical or mental health condition or information, or other financial or health information.

Purpose

In the usage of the Site, TwentyThree will not collect, store nor use sensitive personal information such as credit or debit card numbers, personal financial account information, Social Security numbers, passport numbers, driver's license numbers or similar personal identifiers, racial or ethnic origin, physical or mental health condition or information, or other financial or health information.

Nature of processing



WP Engine

Vendor: WP Engine

WP Engine powers digital experiences for websites and applications built on WordPress.



WP Engine

Website	http://wpengine.com
Country	GB
Address	Irongate House, 22-30 Duke's Place London, EC3A 7LP United Kingdom

Privacy information

Privacy policy	https://wpengine.com/legal/privacy/
Privacy contact email	legal@wpengine.com



Subprocessors

Used by WP Engine

Subprocessors are companies that provide a service for WP Engine and who has or potentially will get access to personal data of WP Engine customers.

Last updated on 2022-05-18 by Openli



Ada by Ada Support Inc.

Description	Purpose
Chatbox	Customer support management and communication
Address	Processing locations
Unit 801, 96 Spadina Avenue, Toronto, Ontario, Canada. Canada	Canada



AWS (Amazon Web Services) hosting by Amazon Web Services, Inc.

Description	Purpose
AWS on-demand cloud computing platform & hosting	Data hosting and backups
Address	Processing locations
410 Terry Ave N, Seattle 98109, Washington, USA United States	United States



Cloudflare by Cloudflare, Inc.

Description	Purpose
Cloud Service Provider	Content distribution, security and DNS services
Address	Processing locations
Cloudflare, Inc. 101 Townsend St. San Francisco, CA 94107 United States United States	United States



DigiCert CertCentral by DigiCert, Inc.

Description

Purpose

SSL certificate provider

Address

2801 North Thanksgiving Way Suite 500 Lehi, Utah 84043 USA
United States

Processing locations

United States



Sucuri by GoDaddy Media Temple Inc d/b/a Sucuri

Description

Secure customer websites from malware

Purpose

Website forensics and cleanup

Address

United States

Processing locations

United States



Google Analytics by Google, LLC

Description

Google Analytics lets you measure your advertising ROI as well as track your Flash, video, and social networking sites and applications

Purpose

site analytics

Address

1600 Amphitheatre Parkway Mountain View, CA 94043, USA
United States

Processing locations

United States



Google Cloud Platform by Google, LLC

Description

cloud computing service

Purpose

Data hosting

Address

1600 Amphitheatre Parkway Mountain View, CA 94043, USA
United States

Processing locations

United States



Let's Encrypt by Internet Security Research Group (ISRG)

Description

A nonprofit Certificate Authority providing TLS certificates.

Purpose

SSL certificate provider

Address

548 Market St, PMB 77519, San Francisco, California 94104-5401, Unites States
United States

Processing locations

United States



New Relic by New Relic, Inc.

Description

Application performance monitoring

Purpose

Website performance analytics

Address

188 Spear Street Suite 1000 San Francisco, CA 94105 Attn: Legal Data Subject Request
United States

Processing locations

United States



Cloud Servers by Rackspace US, Inc.

Description

Cloud Hosting

Purpose

Data hosting

Address

1 Fanatical Place, City of Windcrest, San Antonio, Texas 78218, USA
United States

Processing locations

United States



StackPath DNS by StackPath, LLC

Description

Purpose

Content distribution, security and DNS services

Address

1950 N. Stemmons Freeway Suite 1001 Dallas, TX 75207, United States
United States

Processing locations

United States



Zendesk by Zendesk, Inc.

Description

Customer service software and platform

Purpose

Customer support management and communication

Address

989 Market Street. San Francisco, CA 94103, USA
United States

Processing locations

United States



Processing locations

Used by WP Engine

The location of the subprocessors that are processing data on behalf of WP Engine. If data is sent outside the EEA there must be a legal basis for these transfers.

Last updated on 2022-11-28 by Openli

Location

Netherlands



Data Transfers

By WP Engine

The basis for WP Engine transfers of personal data outside EEA. Vendors can also add a description of their own impact assessment for data transfers.

Last updated on 2022-08-03 by Openli



Privacy Shield (NB Invalid!)

Impact assessment

'We participate in and have certified our compliance with the EU – U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework. We are committed to subjecting all personal data received from European Union (EU) member countries, United Kingdom, and Switzerland, respectively, in reliance on each Privacy Shield Framework, to the Framework's applicable Principles.'

As found at section 6: <https://wpeengine.com/legal/privacy/>



Data Processing Agreements

Between you and WP Engine

The DPA is a contract between you and WP Engine that has to be in place when processing personal data and transferring it WP Engine.



Last updated on 2022-05-18 by Openli



Data processing agreement

Comment

WP Engine data privacy addendum attached.