

#### **Staffbase Sub-Processors**

9 February 2024

To support the delivery of the Staffbase Services, Staffbase uses Sub-Processors that may store and process personal data of Staffbase's Customers. This page provides important information about the identity, location, and role of our Sub-Processors. Terms used on this page but not defined have the same meanings as in our <u>Master Subscription Agreement</u> (the "**Agreement**").

We wish to highlight that: (i) the Sub-Processors used in relation to the Staffbase Services, depends on what product(s) Customer has ordered; and (ii) Staffbase is a global company and our Staffbase Affiliates may process personal data in order to provide the Staffbase Services, including (technical) customer support.

#### **Product Specific Sub-Processors**

**Product: Employee App & Front Door Intranet** 

Service Provider	Processing Activities	Entity Country	Storage Location	Transfer Basis
Required Infrastructure and other Services				
Microsoft Ireland	Microsoft offers:	Ireland	EU Hosting	
Operations Ltd. (Azure)	ISO 27001 certified data hosting; when part of Customer's Order and/or when activated by Customer:  Microsoft Translator services; Staffbase Al Companion features*  *For EU Hosting: Staffbase Al Companion features are currently hosted in the Netherlands and/or Sweden.		EU (Germany)	n/a
			* (NL & Sweden)	
			US Hosting	
			USA (Virginia)	Model Clauses
				EU-US DPF
Zendesk, Inc.	Zendesk provides a platform to manage customer support requests. In general, only Admin Users or other Authorized Users authorized by Customer to access the Staffbase Studio may request support from Staffbase via the Zendesk platform. The personal data that may be processed by Zendesk in this regard are: name, email address, (company) phone number, content, and metadata of the support ticket and any other communication shared with Staffbase via the Zendesk support widget.	USA	EU	Model Clauses EU-US DPF
Gainsight, Inc.	We use Gainsight to provide our Digital Customer Success Services to Customer's primary contacts who are managing the Staffbase subscription. For this purpose, Gainsight processes name and company email address of Customer's primary contact known by Staffbase. Customer defines the primary contact for their subscription. For enhanced customer success purposes, Gainsight also processes the following limited information related to any support ticket raised by Customer via an	USA	EU (Germany)	Model Clauses EU-US DPF

integration with Zendesk: name and company email address of the authorized individual who raised the support ticket.  Google LLC (Firebase Cloud Messaging to send push notifications to the mobile application used by Authorized Users. Google Firebase only processes random Instance IDs to determine which devices to deliver the notification to. Each Instance ID is unique to a particular app and device and is required for sending the push notification. Google Firebase cannot link this Instance ID to Authorized Users. Authorized Users can control push notifications through the app settings.  Cloudflare, Inc.  Cloudflare provides a Content Delivery Network (CDN) for international distribution of any media asset (pictures, video, files) selected for use with the Staffbase Service. Customer's use of the CDN results in faster delivery of media files. Media files uploaded by Customers can contain personal data, such as names or images.  New - cybersecurity services  As of May 2024, we plan to roll-out Cloudflare's cybersecurity services to enhance the protection of Customer Content. Cybersecurity services include: distributed denial of service (DDoS) attack prevention, web application firewall (WAF) and related security services. Cloudflare may process all Personal Data in Customer Content (including profile information, media files and other content) uploaded to the Staffbase products for the cybersecurity services to function properly.  Email Services - EU Hosting  Mailjet SAS  ISO 27001 certified email service provider used to deliver emails to Authorized Users. Mailjet has access	ses S DPF			
Claus   Dush notifications to the mobile application used by Authorized Users. Google Firebase only processes random Instance IDs to determine which devices to deliver the notification to. Each Instance ID is unique to a particular app and device and is required for sending the push notification. Google Firebase cannot link this Instance ID to Authorized Users. Authorized Users can control push notifications through the app settings.    Cloudflare, Inc.   Cloudflare provides a Content Delivery Network (CDN) for international distribution of any media asset (pictures, video, files) selected for use with the Staffbase Service. Customer's use of the CDN results in faster delivery of media files. Media files uploaded by Customers can contain personal data, such as names or images.    New - cybersecurity services   As of May 2024, we plan to roll-out Cloudflare's cybersecurity services to enhance the protection of Customer Content. Cybersecurity services include: distributed denial of service (DDoS) attack prevention, web application firewall (WAF) and related security services. Cloudflare may process all Personal Data in Customer Content (including profile information, media files and other content) uploaded to the Staffbase products for the cybersecurity services to function properly.    Email Services - EU Hosting   Mailjet SAS   ISO 27001 certified email service provider used to   France   EU   n/a	ses S DPF			
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Mailjet SAS       ISO 27001 certified email service provider used to       France       EU       n/a	3 DPF			
to the email addresses of Authorized Users and the content of the email itself.				
Email Services - US Hosting				
Mailgun Technologies Inc.  ISO 27001 certified email service provider used to deliver emails to Authorized Users. Mailgun has access to the email addresses of Authorized Users and the content of the email itself.  USA USA USA USA USA				
Optional Services - only applicable when part of a specific product plan or when listed on the Order.				
Twilio, Inc.  Only applicable when Customer uses the SMS services supported by Twilio (when available).  USA  USA  USA  Claus				
When SMS is activated, Customers can send SMS messages directly to Authorized Users. Customers are required to have a separate Twilio account. Twilio will process: phone number of recipient, content of the SMS message.	1			

## **Product: Employee Email**

Service Provider	Processing Activities	Entity Country	Storage Location	Transfer Basis	
Required Inf	Required Infrastructure and other Services				
Amazon Web	We plan to replace AWS's hosting services with Azure's hosting services in the near future. We also plan to				
Services (EMEA SARL)	rvices replace AWS's Simple Email Service in the near future.  IEA Until further changes to this Subprocessor Page, we will	Luxem- bourg	Germany	n/a	
	ISO 27001 certified data hosting. We use AWS for hosting	<b>US Hosting</b>	•		
	services and to send: (i) email notifications to Employee Email Users; and (ii) employee emails to Email Recipients via Amazon Simple Email Service.	USA	USA	Model Clauses	
				EU-US DPF	
Microsoft Ireland	We plan to migrate Customer Content from AWS to Azure in the near future. Both AWS and Azure may	Ireland	EU Hosting		
Operations Ltd.	Operations process Customer Content for hosting services for a		Germany	n/a	
(Azure)	to rely on Amazon's Simple Email Service for now.		US Hosting		
	Microsoft offers ISO 27001 certified data hosting.		USA (Virginia)	Model Clauses	
				EU-US DPF	
Zendesk, Inc.	Zendesk provides a platform to manage customer support requests. In general, only Admin Users request support from Staffbase via the Zendesk platform. The personal	USA	EU	Model Clauses	
	data that may be processed by Zendesk in this regard is the Admin User's name, email address, (company) phone number, content, and metadata of the support ticket.			EU-US DPF	
Gainsight, Inc.	We use Gainsight to provide our Digital Customer Success Services to Customer's primary contacts who are	USA	EU (Germany)	Model Clauses	
	managing the Staffbase subscription. For this purpose, Gainsight processes name and company email address of Customer's primary contact known by Staffbase. Customer defines the primary contact for their subscription. For enhanced customer success purposes, Gainsight also processes the following limited information related to any support ticket raised by Customer via an integration with Zendesk: name and company email address of the authorized individual who raised the support ticket.			EU-US DPF	

## **Product: Communications Control**

Service	Processing Activities	Entity	Storage	Transfer
Provider		Country	Location	Basis
Microsoft Ireland Operations Ltd.	Microsoft offers ISO 27001 certified data hosting and, when applicable, Microsoft Translator services.	Ireland	EU (NL & Ireland)	n/a

(Azure)				
Intercom R&D Unlimited Company	Intercom provides a support platform to manage customer support requests and provide support guidance. Intercom will process contact details of the user requesting support, including full name and email address, content of support requests, and application telemetry data.	Ireland	EU (Ireland)	n/a
The Rocket Science Group, LLC	ISO 27001 certified email service provider used to deliver emails to Authorized Users. Mailchimp has access to the first name, last name, and email addresses of Authorized Users and the content of the email itself.	USA	USA (QTS & Sabey colocation data centers)	Model Clauses EU-US DPF
Zendesk, Inc.	Staffbase will start using the Zendesk support platform related to Communications Control in the near future.  Zendesk provides a platform to manage customer support requests. The personal data that may be processed by Zendesk in this regard is the requestor's name, email address, (company) phone number, content, and metadata of the support ticket.	USA	EU	Model Clauses EU-US DPF
Gainsight, Inc.	We use Gainsight to provide our Digital Customer Success Services to Customer's primary contacts who are managing the Staffbase subscription. For this purpose, Gainsight processes name and company email address of Customer's primary contact known by Staffbase. Customer defines the primary contact for their subscription. For enhanced customer success purposes, Gainsight also processes the following limited information related to any support ticket raised by Customer via an integration with Zendesk: name and company email address of the authorized individual who raised the support ticket.	USA	EU (Germany)	Model Clauses EU-US DPF

### **Staffbase Group**

Depending on the geographic location of a Customer, and the type of Staffbase Services provided, Staffbase may also engage one or more of the following Staffbase Affiliates as Sub-Processors.

These Staffbase Affiliates are required to deliver (technical) support and similar services to a Customer. Staffbase has an intragroup data processing agreement, including Model Clauses, to facilitate these transfers.

Staffbase Affiliate	Location	Transfer Mechanism
Staffbase GmbH	Germany	Intragroup DPA with Model Clauses
Staffbase B.V.	Netherlands	Intragroup DPA with Model Clauses
Staffbase UK Ltd.	United Kingdom	Intragroup DPA with Model Clauses; and Adequacy Decision of 28 June 2021
Staffbase Inc.	USA	Intragroup DPA with Model Clauses
Staffbase Canada Systems Inc. (formerly Bananatag Systems Inc.)	Canada	Intragroup DPA with Model Clauses; and Adequacy Decision 2002/2/EC

Staffbase Finland Oy (formerly Valo Solutions Oy)	Finland	Intragroup DPA with Model Clauses
Staffbase Systems Quebéc Inc. (formerly Valo Solutions Inc.)	Canada	Intragroup DPA with Model Clauses
Staffbase Australia Pty (formerly Valo Solutions Pty Ltd)	Australia	Intragroup DPA with Model Clauses

## **Updates**

The Sub-Processors we engage may change as our business continues to grow and evolve. We will update our Customers of any new Sub-Processors in accordance with our <u>Data Processing Agreement</u>.

# Changelog

Update date	Description of changes
01 October 2020	We've added a new column specifying the legal mechanism for international data transfers and we have updated the storage location for the Microsoft Translator services.
17 May 2021	The updates reflect: <ul> <li>a change in address of Zendesk Inc.;</li> <li>the current contracting entity of Amazon Web Services and Microsoft;</li> <li>our upcoming roll out of movingimage EVP GmbH;</li> <li>our recent merger with Bananatag Systems Inc.;</li> <li>our upcoming use of Mailgun as our email provider in relation to US Hosting.</li> </ul>
17 August 2021	The updates reflect:     • the launch of our latest product Employee Email; and     • UK's adequacy decision as legitimate transfer mechanism.
11 February 2022	The updates reflect:
15 July 2022	<ul> <li>The updates reflect: <ul> <li>the deprecation of Cloudfront as of 15 September 2022;</li> <li>the roll-out of Cloudflare as of 15 September 2022;</li> <li>changes the way we sell our various products. This new version shows the relevant Sub-Processors per Staffbase product; and</li> <li>the offering of Microsoft Translator services as part of a specific product package. Instead of offering Microsoft Translator as an optional service for all customers, it will only be part of a specific product plan;</li> <li>the recent addition of Dirico and Valo companies to the Staffbase Group.</li> </ul> </li> </ul>
21 November 2022	The updates reflect:  the addition of Sub-Processors used in relation to the new Staffbase Service called 'Communications Control'; and  the deprecation of the video services provided by movingimage EVP GmbH. As a result we have removed this movingimage EVP GmbH from the Sub-Processor Page.
12 May 2023	The updates reflect:
1 October 2023	The updates reflect:         • the addition of Gainsight as Sub-Processor for the provision of digital customer success services; and         • the removal of Staffbase Koblenz GmbH from the list a merger of Staffbase Koblenz GmbH with Staffbase GmbH.
9 February 2024	The updates reflect:         • the planned roll-out of cybersecurity services of Cloudflare;         • the introduction of optional SMS services (supported by Twilio); and         • the removal of Staffbase Romania as a Staffbase Affiliate.