



## Staffbase Sub-Processors

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 [Master Subscription Agreement](#) (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				
<b>Microsoft Ireland Operations Ltd. (Azure)</b>	We use the services of Microsoft for: <ul style="list-style-type: none"><li>• ISO 27001 certified data hosting;</li><li>• Microsoft Translator services;</li><li>• AI Video Indexer API for video subtitle creations;</li><li>• the creation of features powered by AI and machine learning by using the secure Azure OpenAI services.*</li></ul> <i>* for EU Hosting: Staffbase AI Companion features are currently hosted in the Netherlands and/or Sweden.</i>	Ireland	<b>EU Hosting:</b> Germany <b>US Hosting:</b> USA <b>AU Hosting:</b> Australia	Where applicable:  Model Clauses;  EU-US DPF
<b>Zendesk, Inc.</b>	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
<b>Gainsight, Inc.</b>	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	USA	EU (Germany)	Model Clauses  EU-US DPF

	support ticket.			
<b>Google LLC (Firebase Cloud Messaging)</b>	We use Google 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.	USA	Global	Model Clauses  EU-US DPF
<b>Cloudflare, Inc.</b>	Cloudflare provides: <ul style="list-style-type: none"> <li>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.</li> <li>Cybersecurity services, including: 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.</li> </ul>	USA	<b>EU Hosting:</b> EU  <b>US Hosting:</b> USA  <b>AU Hosting:</b> Australia ( <i>for logs: EU</i> )	Model Clauses  EU-US DPF
<b>Mailjet GmbH</b>	ISO 27001 certified email service provider used to deliver emails to Authorized Users. Mailjet has access to the email addresses of Authorized Users and the content of the email itself.	Germany	<b>EU or AU Hosting:</b> EU  <b>US Hosting:</b> USA	n/a
<b>Optional Services</b>				
<b>Merge API, Inc.</b>	Merge enables Staffbase to provide HR Cloud Integrations. By using the HR Cloud Integrations Customer can integrate their third party HR platform to the Staffbase platform via Merge's API. To provide the HR Cloud Integrations, Merge must processes personal data. The full list of processed data depends on the integrations chosen by Customer. Information that may be processed include: full name, email address, HRIS and payroll information. Customer has control over the types of data are synced with Merge.	USA	<b>EU or AU Hosting:</b> EU  <b>US Hosting:</b> USA	Model Clauses  EU-US DPF
<b>Deutsche Telekom MMS GmbH</b>	If Customer buys MMS plugins directly from Staffbase, MMS will act as a Sub-Processor. Depending on the purchased plugin, MMS may process: full name; email address; UserID; profile picture.	Germany	Germany	n/a

<b>Amazon Web Services (EMEA SARL)</b>	Customers can decide to use AWS's Simple Email Services (SES) as an alternative to the email sending services from Mailjet. If SES is activated, AWS will process: full name, email address, and the content of the email itself.	Luxembourg	<b>EU Hosting:</b> Germany  <b>US Hosting:</b> USA  <b>AU Hosting:</b> Australia	Where applicable:  Model Clauses  EU-US DPF
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### Product: Employee Email

Service Provider	Processing Activities	Entity Country	Storage Location	Transfer Basis
<b>Required Infrastructure and other Services</b>				
<b>Amazon Web Services (EMEA SARL)</b>	ISO 27001 certified data hosting. We use AWS for hosting services and to send: (i) email notifications to Employee Email Users; and (ii) employee emails to Email Recipients via Amazon Simple Email Service.	Luxembourg	<b>EU Hosting:</b> Germany  <b>US Hosting:</b> USA	Where applicable:  Model Clauses  EU-US DPF
<b>Microsoft Ireland Operations Ltd. (Azure)</b>	Microsoft offers ISO 27001 certified data hosting.	Ireland	<b>EU Hosting:</b> Germany  <b>US Hosting:</b> USA ( <i>Virginia</i> )	Where applicable:  Model Clauses  EU-US DPF
<b>Zendesk, Inc.</b>	Zendesk provides a platform to manage customer support requests. In general, only Admin Users request support from Staffbase via the Zendesk platform. The personal 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.	USA	EU	Model Clauses  EU-US DPF
<b>Gainsight, Inc.</b>	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 ( <i>Germany</i> )	Model Clauses  EU-US DPF

**Product: Staffbase Email [new]**

Service Provider	Processing Activities	Entity Country	Storage Location	Transfer Basis
<b>Required Infrastructure and other Services</b>				
<b>Microsoft Ireland Operations Ltd. (Azure)</b>	<p>Microsoft offers:</p> <ul style="list-style-type: none"> <li>ISO 27001 certified data hosting;</li> <li>Staffbase AI Companion features*</li> </ul> <p><i>*For EU Hosting: Staffbase AI Companion features are currently hosted in the Netherlands and/or Sweden.</i></p>	Ireland	<p><b>EU Hosting:</b> Germany</p> <p><b>US Hosting:</b> USA</p> <p><b>AU Hosting:</b> Australia</p>	<p>Where applicable:</p> <p>Model Clauses</p> <p>EU-US DPF</p>
<b>Amazon Web Services (EMEA SARL)</b>	ISO 27001 certified data hosting. We use AWS for hosting services and to send employee emails to Email Recipients via Amazon Simple Email Service.	Luxembourg	<p><b>EU Hosting:</b> Germany</p> <p><b>US Hosting:</b> USA</p> <p><b>AU Hosting:</b> Australia</p>	<p>Where applicable:</p> <p>Model Clauses</p> <p>EU-US DPF</p>
<b>Mailjet GmbH</b>	ISO 27001 certified email service provider used to deliver emails to Email Recipients. Mailjet has access to the email addresses of Email Recipients and the content of the email itself.	Germany	<p><b>EU or AU Hosting:</b> EU</p> <p><b>US Hosting:</b> USA</p>	n/a
<b>Zendesk, Inc.</b>	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	<p>Model Clauses</p> <p>EU-US DPF</p>
<b>Gainsight, Inc.</b>	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)	<p>Model Clauses</p> <p>EU-US DPF</p>

## Product: Communications Control

Service Provider	Processing Activities	Entity Country	Storage Location	Transfer Basis
<b>Microsoft Ireland Operations Ltd. (Azure)</b>	Microsoft offers ISO 27001 certified data hosting and, when applicable, Microsoft Translator services.	Ireland	EU (NL & Ireland)	n/a
<b>The Rocket Science Group, LLC</b>	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
<b>Zendesk, Inc.</b>	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
<b>Gainsight, Inc.</b>	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	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
<b>Staffbase SE</b>	Germany	Intragroup DPA with Model Clauses
<b>Staffbase B.V.</b>	Netherlands	Intragroup DPA with Model Clauses

<b>Staffbase UK Ltd.</b>	United Kingdom	Intragroup DPA with Model Clauses; and Adequacy Decision of 28 June 2021
<b>Staffbase Inc.</b>	USA	Intragroup DPA with Model Clauses
<b>Staffbase Canada Systems Inc. (formerly Bananatag Systems Inc.)</b>	Canada	Intragroup DPA with Model Clauses; and Adequacy Decision 2002/2/EC
<b>Staffbase Finland Oy (formerly Valo Solutions Oy)</b>	Finland	Intragroup DPA with Model Clauses
<b>Staffbase Systems Québec Inc. (formerly Valo Solutions Inc.)</b>	Canada	Intragroup DPA with Model Clauses
<b>Staffbase Australia Pty (formerly Valo Solutions Pty Ltd)</b>	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 [Data Processing Agreement](#).

## 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 style="list-style-type: none"> <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: <ul style="list-style-type: none"> <li>• the launch of our latest product Employee Email; and</li> <li>• UK's adequacy decision as legitimate transfer mechanism.</li> </ul>
11 February 2022	The updates reflect: <ul style="list-style-type: none"> <li>• the deprecation of 1&amp;1 IONOS;</li> <li>• the upcoming deprecation of SysEleven GmbH; and</li> <li>• the upcoming roll out of Microsoft Ireland Operations Ltd. as hosting provider for customers with DE Hosting.</li> </ul>
15 July 2022	The updates reflect: <ul style="list-style-type: none"> <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>
21 November 2022	The updates reflect: <ul style="list-style-type: none"> <li>• the addition of Sub-Processors used in relation to the new Staffbase Service called 'Communications Control'; and</li> <li>• 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.</li> </ul>
12 May 2023	The updates reflect: <ul style="list-style-type: none"> <li>• the use of Azure for hosting services for Employee Email;</li> <li>• the introduction of optional SMS services for Employee Email.</li> </ul>
1 October 2023	The updates reflect: <ul style="list-style-type: none"> <li>• the addition of Gainsight as Sub-Processor for the provision of digital customer success services; and</li> <li>• the removal of Staffbase Koblenz GmbH from the list a merger of Staffbase Koblenz GmbH with Staffbase GmbH.</li> </ul>
9 February 2024	The updates reflect: <ul style="list-style-type: none"> <li>• the planned roll-out of cybersecurity services of Cloudflare;</li> <li>• the introduction of optional SMS services (supported by Twilio); and</li> <li>• the removal of Staffbase Romania as a Staffbase Affiliate.</li> </ul>
10 July 2024	The updates reflect: <ul style="list-style-type: none"> <li>• the launch of our new product 'Mission Control';</li> </ul>

	<ul style="list-style-type: none"> <li>• the deprecation of Intercom for 'Communication Control'; and</li> <li>• the change of contract entity to Mailjet GmbH (from Mailjet SAS or Mailgun Technologies, Inc) for the provision of App, Intranet, and Mission Control email services. This does not impact the way Staffbase or Mailjet processes Personal Data.</li> </ul>
14 October 2024	<p>The updates reflect:</p> <ul style="list-style-type: none"> <li>• the launch of our new product 'Email Modern';</li> <li>• Deleting details for Mission Control as currently a feature of Intranet &amp; App (subprocessors are set out with respect to those products); and</li> <li>• the entity change from Staffbase GmbH to Staffbase SE.</li> </ul>
26 November 2024	<p>The updates reflect:</p> <ul style="list-style-type: none"> <li>• the launch of the new optional HR Cloud Integration services;</li> <li>• the launch of Australian hosting.</li> </ul>
5 June 2025	<p>The updates reflect:</p> <ul style="list-style-type: none"> <li>• the optional email sending services from AWS for Employee App /Front Door Intranet;</li> <li>• the possibility for Customer to buy MMS plugins from Staffbase for Employee App /Front Door Intranet;</li> <li>• the use of Microsoft's Video Indexer API for creating video subtitles powered by AI.</li> </ul>