

Data Sub-processor List [April 2022]

To support delivery of our Services, Data Zoo may engage and use third-party data processors (each a "Sub-processor"). Prior to engaging any third-party Sub-processor, we perform necessary due diligence to evaluate their security, privacy, and confidentiality practices, before entering into an agreement with each such Sub-processor to implement its applicable obligations.

Data Zoo uses certain Sub-processors (which may include entities in the Data Zoo group and other third parties, as listed below) to provide services relating to personal data that Customers as data controllers make available to Data Zoo through the IDU and IDUX Platform (in Data Zoo contracts referred to as "End User Data"). Data Zoo appoint such Sub-processors only in accordance with applicable laws and regulations including, where EU/EEA/UK data subjects are concerned, the GDPR as applicable in the EU and the UK. Data Zoo will enter into written agreements with each Sub-processor including all required legal provisions, safeguards for international personal data transfers where required, as well as IT security standards similar to those set-out in Data Zoo's [Information Security Policy](#).

The following is the up-to-date list of the names, functional purpose, and locations of Data Zoo's relevant Sub-processors currently engaged by Data Zoo to provide various services related to Data Zoo's service offerings:

Sub-Processor	Permitted Activity/ Services Performed (Purpose/Function)	HQ Location / Entity Country/ Address	Service Delivery/ Processing Location(s)	External links for additional information relating to security
Atlassian	Technical Project Management Task Tracking Bug and Issue Tracking	Australia	Australia Ireland USA	https://www.atlassian.com/trust/compliance/resources/gdpr
Cloudflare	Cloud Hosting Provider and content delivery Website and application security Denial-of-service protection (DDOS) Load balancing and processing of traffic (inspection and blockage in case of malicious activity) between customer and Data Zoo services	United States of America	Global Cloudflare operates in 250 cities in 100+ countries around the world; the geographical area of our client will determine the most appropriate location through which data is transmitted.	https://www.cloudflare.com/resources/assets/slt3lc6tev37/1S0GcmfDE4rA1CK5dCK9kL/1410444a21bedc1aefaa9e332b4a1e34/Data_Transit_Privacy_Whitepaper_V2.pdf https://www.cloudflare.com/trust-hub/technologies/
Dialpad	Communications. Cloud-based business phone system.	United States of America	Data is processed and stored in Sydney, Australia. Co-location backup of Metadata in Los Angeles, USA. Pursuant to Clause 9 of these SCCs, Data Exporter has generally authorized the use of Data Importer's sub-processors. A current list of authorized sub-processors is available at www.dialpad.com/sub-processor . Dialpad may engage and use third party data processors with access to certain customer data (each, a "Sub-processor") in order to support delivery of our Services. For example, Dialpad currently uses Sub-processors to provide infrastructure services, and to help us provide customer support and email notifications. This page provides important information about the identity and role of Sub-processors. The table below shows what activity each sub-processor performs. Prior to engaging any sub-processor, Dialpad undertakes a thorough review to evaluate the privacy, security and confidentiality practices of potential vendors that will or may have access to or process customer data. Dialpad maintains contracts with each Sub-processor to limit the processing of customer data to the extent necessary to provide the specified service, to ensure levels of privacy and security at least equivalent to those provided by Dialpad, and to minimize the amount of customer data that is processed.	Data Processing Agreement (DPA) – Dialpad
Freshworks	Support Helpdesk (Freshdesk) Sales CRM (FreshSales) Support Channel Chat (FreshChat)	United States of America	USA European Economic Area Australia India	https://www.freshworks.com/gdpr/ https://www.freshworks.com/security/
Functional Software, Inc. (dba Sentry.io)	Monitor logs and events. Error and Performance monitoring	45 Fremont Street, 8th Floor San Francisco CA 94105	USA	https://sentry.io/legal/dpa/#security-of-processing-1
Google Cloud Platform	Cloud Infrastructure Services	1600 Amphitheatre Parkway Mountain View CA 94043	Sydney, Australia Singapore, Singapore Frankfurt, Germany	https://cloud.google.com/security/
IDRnD	Biometric/Liveness Detection	1441 BROADWAY, SUITE 6019 NEW YORK, NEW YORK 10018 USA	USA Australia	https://www.idrnd.ai/privacy-and-terms/
Microblink	OCR Technology	Strojarska cesta 20, Zagreb, Croatia	Australia	Privacy Policy — Microblink
Microsoft Office	Communication and collaboration, Storage,	United States of America	Australia	Microsoft Data Access Management Access Control
MongoDB Atlas3	Storage and processing of flow configuration Transaction logging and reporting	United States of America	Australia Singapore Germany	https://www.mongodb.com/security
PandaDoc	Sales Processing document automation software as a service with built-in electronic signatures, workflow management, a document builder, and CPQ functionality.	United States of America	Processed and Stored in the USA. To support the delivery of our Services, PandaDoc, Inc may use data processors with access to certain Customer Data ("Subprocessor"). A current list of authorized sub-processors is available at: https://www.pandadoc.com/gdpr/subprocessors/	https://www.pandadoc.com/privacy-notice/

Postman	Monitoring and testing of Data Zoo API requests and responses, and testing of external data source APIs.	201 Mission Street Suite 2375 San Francisco, CA 94105	Australia New Zealand	Privacy Policy Postman
Rank One Computing	Facial Recognition Solution	United States of America	Australia Singapore Germany	Privacy Policy - Rank One Computing
Slack Technologies, Inc.	Internal Communication Tool	United States of America	USA	https://slack.com/intl/en-au/security-practices
Twilio Inc (SendGrid)	External communications using personal data necessary to provide SMS functionality	United States of America	USA	Data Protection Addendum www.twilio.com
	Data Sources: All Data Sources utilised in the delivery of our IDU Services are listed and maintained at Data Zoo IDU@ (https://idu-api.datazoo.com/)	Each Data Source is categorised by and within a folder corresponding to its geographical location.		

SUB-PROCESSER CHANGES AND THE RIGHT TO OBJECT

As our business grows and evolves, the Sub-processors used to deliver our Service may change. We endeavour to provide the owner of the Customer's account with notice of any new Sub-processors to the extent required under the Agreement and relevant Statutory and Regulatory requirements (including Data Protection laws and regulations) along with posting updates here.

As part of standard due diligence, we expect and require our Customers to familiarise themselves with our business and the list of Sub-processors provided above at the precontractual stage. At the time of contracting with Data Zoo, it is accepted that all Customers consent to the Sub-processors listed (current at that time).

Data Zoo may update the list of Sub-processors at any time by updating this page, as soon as practicable after the change or proposed change has been decided. We endeavour to give as much notice as is possible to allow our Customers the opportunity to exercise their right to object in so far as it applies to their particular contracting arrangement. Interested clients may sign up using the form below in order to receive notifications of changes to this list.

If as a current or prospective Data Zoo Customer you have a significant and legitimate objection to the use of any Sub-processor, you must promptly contact your regular Data Zoo contact to notify us of your objection in order to reach a speedy resolution.

Blacklisted or Excluded Sub-processors: Where appropriate, the Customer may take a proactive approach by providing Data Zoo with a list of Sub-processors that Data Zoo are instructed to exclude from use in the provision of services to that Customer (blacklisted or excluded sub-processors). It will be the Customers responsibility to ensure that the blacklist is maintained and promptly communicated to Data Zoo.

Urgent Basis: Sub-processors may be replaced on an urgent basis where such change is outside of Data Zoo's reasonable control (e.g. if a Sub-processor ceases business or its agreement with Data Zoo is terminated early). Data Zoo will still follow the above process as soon as practicable after the change becomes known, however, data processing may be commenced by the Sub-processor on a temporary basis.

Resolution Options

Where a Customer objects to a change or provides an excluded or blacklist of sub-processors, Data Zoo may decide to remedy the objection through one of the following options:

1. Ensure the Customer's personal data is not processed by the excluded or objected Sub-processor(s); or
2. Where possible, proceed to use the Sub-processor(s) but ensure changes are made to meet the Customer's objections; or
3. Cancel or suspending all or part of the Data Zoo services that would involve the Sub-processor(s) processing that Customer's personal data. If all or the primary part of Data Zoo's services are cancelled, then subject to the terms and conditions of the agreement, the applicable Customer may be entitled to terminate the agreement for services and to a refund of any fees prepaid for any unused part of the term.