

Whos **On.** Location

Subprocessors-Subcontractors

Last updated on: 24 April 2020

WhosOnLocation Limited (“WhosOnLocation”) uses certain subprocessors (and third parties, as listed below), subcontractors and content delivery networks to assist it in providing the WhosOnLocation Services as described in the [Master Subscription Agreement](#) (“MSA”). Defined terms used herein shall have the same meaning as defined in the MSA.

What is a Subprocessor:

A subprocessor is a third party data processor engaged by WhosOnLocation, who has or potentially will have access to or process Service Data (which may contain Personal Data). WhosOnLocation engages different types of subprocessors to perform various functions as explained in the tables below. WhosOnLocation refers to third parties that do not have access to or process Service Data but who are otherwise used to provide the Services as “subcontractors” and not subprocessors.

Due Dilligence:

WhosOnLocation undertakes to use a commercially reasonable selection process by which it evaluates the security, privacy and confidentiality practices of proposed subprocessors that will or may have access to or process Service Data.

Contractual Safeguards:

WhosOnLocation requires its subprocessors to satisfy equivalent obligations as those required from WhosOnLocation (as a Data Processor) including but not limited to the requirements to:

- in connection with their subprocessing activities, use only personnel who are reliable and subject to a contractually binding obligation to observe data privacy and security, to the extent applicable, pursuant to applicable data protection laws;
- Provide regular training in security and data protection to personnel to whom they grant access to Personal Data;
- implement and maintain appropriate technical and organizational measures (including measures consistent with those to which WhosOnLocation is contractually committed to adhere insofar as they are equally relevant to the subprocessor’s processing of Personal Data on WhosOnLocation’s behalf) and provide an annual certification that evidences compliance with this obligation. In the absence of such certification WhosOnLocation reserves the right to audit the subprocessor;

- promptly inform WhosOnLocation about any actual or potential security breach; and
- cooperate with WhosOnLocation in order to deal with requests from data controllers, data subjects or data protection authorities, as applicable.

This policy does not give Subscribers any additional rights or remedies and should not be construed as a binding agreement. The information herein is only provided to illustrate WhosOnLocation's engagement process for subprocessors as well as to provide the actual list of third party subprocessors, subcontractors and content delivery networks used by WhosOnLocation as of the date of this policy (which WhosOnLocation may use in the delivery and support of its Services).

Infrastructure Subprocessors – Service Data Storage

WhosOnLocation owns or controls access to the infrastructure that WhosOnLocation uses to host Service Data submitted to the Services, other than as set forth below. Currently, the WhosOnLocation production systems for the Services are located in co-location facilities in the United States, United Kingdom, Canada, the UK, Australia, and New Zealand. Subscriber accounts are established in one of these regions based on where the Subscriber is located; the Subscriber's Service Data subsequently remains in that region; but may be shifted among data centers within a region to ensure performance and availability of the Services. The following table describes the countries and legal entities engaged in the storage of Service Data by WhosOnLocation.

Entity Name	Entity Type	Entity Country	Location
<u>Amazon Web Services, Inc.</u>	Cloud Service Host Provider	United States	Virginia
<u>Amazon Web Services, Inc.</u>	Cloud Service Host Provider	Germany	Frankfurt
<u>Amazon Web Services, Inc.</u>	Cloud Service Host Provider	United Kingdom	London
<u>Amazon Web Services, Inc.</u>	Cloud Service Host Provider	Australia	Sydney
<u>Amazon Web Services, Inc.</u>	Cloud Service Host Provider	Canada	Montreal

Service Specific Subprocessors

WhosOnLocation uses certain third parties to provide specific functionality within the Services. These providers are the Subprocessors set forth below. In order to provide the relevant functionality these Subprocessors access Service Data. Their use is limited to the indicated Services.

Entity Name	Purpose	Applicable Services	Entity Country
Bulletin Messenger	There are many areas of the Service that utilizes SMS messaging including visitor (Data Subject) arrivals, evacuation alerts,, and Triggers. Data contained in the messages is limited to: the Data Subject's (visitor, contractor, or employee) Name and where they are from, and whom they are visiting (if applicable). Depending on the settings applied by the Data Controller (our Customer) messages may include the Data Subject's mobile number if captured.	SMS Messaging and Notifications, Triggers, Evacuation Messaging	New Zealand and Global
Zendesk Inc	Zendesk Inc provides a cloud-based Knowledge Library and Customer Support software. WhosOnLocation uses Zendesk as our Helpdesk and ticket management software.	Helpdesk and Support Ticketing	United States
BackBlaze	BackBlaze is used by WhosOnLocation as a secure back up service of our employees workstations, and laptops.	Backup	United States

Subcontractors

As explained above, WhosOnLocation uses certain “subcontractors” to assist in the operations necessary to provide the WhosOnLocation services as described in the [Master Subscription Agreement](#). The following is a list (as of the date of this policy) of the names and locations of material third-party subcontractors.

Subcontractors **do not** have access to Service Data.

Entity Name	Entity Type	Entity Country
Slack	Internal IM communication Tool	United States
PipeDrive	CRM	United States
ScheduleOnce	Online Demo Scheduling Software	United States