

Skoach Sub-Processor List

Required Sub-Processors

Sub-Processor	Data they process	Based in	Data stored in
Amazon Web Services	<p>AWS is the underlying hosting provider for all Skoach’s infrastructure, including main database storage, backup storage and uploaded files (challenges, images, temporary). All data is stored in Ireland. Our primary data center is AWS-EU-west-1 (Ireland).</p> <p>As our main data storage, AWS hosts all personal data and associated conversations that occur within or with our app.</p> <p>Amazon Web Services offers a GDPR-compliant Data Processing Agreement that includes the EU’s Model Clauses that ensure any Personal Data is handled in compliance with the EU’s data protection law. More info in https://aws.amazon.com/blogs/security/aws-gdpr-data-processing-addendum/. AWS also complies with the CISPE Code of Conduct for Data Protection in the cloud (https://aws.amazon.com/blogs/security/aws-announces-cispe-membership-and-compliance-with-first-ever-code-of-conduct-for-data-protection-in-the-cloud/). See also AWS’s data privacy FAQ (https://aws.amazon.com/compliance/data-privacy-faq/) and cloud security overview (https://aws.amazon.com/security/) for more information.</p>	United States	Ireland
Amplitude	<p>Amplitude is an analytics service that we use to research user engagement within our app.</p> <p>We send only app activity data to this service, linked to an internal ID. No personal data is sent whatsoever. For example, we use this service to analyze when messages are sent and which challenges Users complete, but do not sent the content of the messages, nor who completed the challenges (besides the internal ID).</p> <p>All such data is stored in the USA, using Amazon Web Services. Amplitude is GDPR compliant (https://amplitude.com/blog/2018/04/24/amplitude-gdpr) and provides a Data Processing Agreement, that we have signed, which includes the EU’s Standard</p>	United States	United States

	<p>Contractual Clauses for international data transfer. More info is available at their Data Security & Privacy page (https://help.amplitude.com/hc/en-us/articles/206533238-Data-Security-Privacy).</p>		
Microsoft	<p>We use Microsoft’s Azure Bot Service to connect our App with Microsoft Teams, through their BotFramework service. As such, Clients using Slack or other communication channels are not dependent on this sub-processor.</p> <p>We send no Personal Data to this sub-processor; it only has access to that which is shared by the Client through Microsoft Teams.</p> <p>This sub-processor is GDPR compliant (https://blog.botframework.com/2018/04/23/general-data-protection-regulation-gdpr/). All data transferred by Microsoft from and to the EEA is protected under the guarantees of the EU’s Standard Contractual Clauses (https://docs.microsoft.com/en-us/microsoft-365/compliance/offering-eu-model-clauses?view=o365-worldwide).</p>	United States	United States
Segment.io Inc	<p>Segment is used to forward analytics data to other processors (for now, only Amplitude).</p> <p>Like for Amplitude, we send only app activity data to this service, linked to an internal ID. No personal data is sent whatsoever. For example, we use this service to analyze when messages are sent and which challenges Users complete, but do not sent the content of the messages, nor who completed the challenges (besides the internal ID).</p> <p>They are GDPR compliant (https://segment.com/blog/segment-and-the-gdpr/) and we’ve signed a DPA with the EU’s Model Clauses to guarantee that all data transfers are compliant with EU data protection law.</p>	United States	United States
Google LLC	<p>We use Google Cloud’s Dialogflow Platform for Natural Language Understanding services to provide you with a free-text interface to our App.</p> <p>All free text sent to our app is forwarded to Dialogflow for Intent and Entity extraction. This free text is sent without context and unlinked to any personally identifiable information.</p>	United States	London, United Kingdom

	<p>We use the <i>europa-west2</i> Dialogflow region which stores all data in London, in the United Kingdom.</p> <p>Google itself complies with the GDPR (https://privacy.google.com/businesses/compliance/) and was recognized by the EU's Data Protection Authorities as fully meeting the requirements for data transfer from the EU to the rest of the world (https://www.blog.google/topics/google-cloud/eu-data-protection-authorities-confirm-compliance-google-cloud-commitments-international-data-flows/).</p>		
Stripe	<p>Stripe is our payment processor. It handles all payment information, including, but not limited to, credit card numbers, invoicing information like addresses and VAT numbers, etc.</p> <p>Stripe receives no personal information of individual users of our product.</p> <p>Stripe is fully GDPR compliant (https://stripe.com/en-pt/guides/general-data-protection-regulation#stripe-and-the-gdpr). Data transferred outside the EU complies with the EU Commission's approved Standard Contractual Clauses (https://stripe.com/privacy-center/legal#international-data-transfers). Stripe's Data Protection Officer can be reached at dpo@stripe.com.</p>	Ireland and United States	Ireland and United States

In the case that any additional sub-processors are required to provide our services, Skoach will ensure that any such sub-processors comply with the EU-GDPR regulations and are certified to process Personal Data from EEA users, as well as list such sub-processors in this page. Skoach will limit the transmission of Personal Data to the minimum required to support its services and will prioritize sub-processors that store such data in the EU.

Optional Sub-Processors

Sub-Processor	Data they process	Based in	Data stored in
Google LLC	<p>Used for tracking anonymous event and geographic analytics on our Site, via their Google Analytics product. This tracking is disabled by default until you accept it while navigating the site.</p> <p>Google itself complies with the GDPR (https://privacy.google.com/businesses/compliance/) and was recognized by the EU's Data Protection Authorities as fully meeting the requirements for data</p>	United States	United States

	<p>transfer from the EU to the rest of the world (https://www.blog.google/topics/google-cloud/eu-data-protection-authorities-confirm-compliance-google-cloud-commitments-international-data-flows/).</p>		
Hubspot, Inc.	<p>Used for tracking anonymous event data on our Site, for customizing website content and marketing campaigns according to User activity in the Site, and to capture voluntarily given information via our contact form.</p> <p>This tracking is disabled by default until you accept it while navigating the site.</p> <p>Hubspot is GDPR compliant and provides a Data Processing Agreement that incorporates the EU Model Clauses for international data transfer. For more info visit https://legal.hubspot.com/dpa.</p>	United States	United States