

Subprocessors List.

Liste des Sous-Traitants.

Splio Group (shall mean the company Splio SAS registered in Paris, France, under number 434533071 with its head office at 27 Boulevard des Italiens 75002, Paris, France and any company in which it, fully or partially, owns the majority of the capital or voting rights) uses Sub-processors to assist in the provision of its services. This page provides information about the identity, location and role of each of Splio's Sub-processors.

Le Groupe Splio (désigne la société Splio SAS immatriculée à Paris, France, sous le numéro 434533071 dont le siège social est situé au 27 Boulevard des Italiens 75002, Paris, France et toute société dont elle détient, en tout ou partie, la majorité du capital ou des droits de vote) utilise des Sous-traitants pour l'assister dans la fourniture de ses services. Cette page fournit des informations sur l'identité, la localisation et le rôle de chacun des Sous-traitants de Splio.

Last update: **March 2024**

What is a Sub-processor? | *Qu'est-ce qu'un Sous-traitant ?*

A Sub-processor is the natural person or legal entity that processes or may process personal data on behalf of the Data controller.

Un Sous-traitant est la personne physique ou morale qui traite ou peut traiter des données personnelles pour le compte du Responsable du traitement.

What is a Data controller? | *Qu'est-ce qu'un Responsable de Traitement ?*

A Data controller is the natural person or legal entity that, alone or jointly with others, determines the purposes and means of the processing of the personal data.

Un Responsable de Traitement est la personne physique ou morale qui, seule ou conjointement avec d'autres, détermine les finalités et les moyens du traitement des données à caractère personnel.

What is Splio? | *Qu'est-ce que Splio?*

Splio is a Sub-processor, processing the data collected by its Clients who are Data controllers.

Splio est un Sous-traitant, traitant les données collectées par ses Clients qui sont des Responsables de Traitement.

Splio is a Data Controller for the data collected by Splio for the purposes of its own activities.

Splio est un Responsable de Traitement pour les données collectées par Splio pour les besoins de ses propres activités.

Information about Splio's Sub-processors | *Informations sur les Sous-traitants de Splio*

For all Clients who have executed the standard personal data Processing Agreement ("DPA") or the standard SaaS Services Agreement of Splio (the "Contract"), Splio provides a written prior notice, via its CRM tool, of any updates to the list of Sub-processors that are utilized by Splio to deliver the services.

Pour tous les Clients qui ont signé le Contrat standard de traitement des données personnelles ("DPA") ou le Contrat standard de services SaaS de Splio (le "Contrat"), Splio fournit une notification préalable écrite, via son outil CRM, de toute mise à jour de la liste des Sous-traitants utilisés par Splio pour fournir les services.

Pursuant to the DPA or Contract, a Client may object in writing to the processing of its personal data by a new Sub-processor of Splio within thirty (30) working days following the update information and such objection shall describe Client's reason(s) for objection. If Client does not object during such time period the new Sub-processor(s) shall be deemed accepted.

En vertu du DPA ou du Contrat, un Client peut s'opposer par écrit au traitement de ses données personnelles par un nouveau Sous-traitant de Splio dans un délai de trente (30) jours ouvrables suivant la mise à jour des informations et cette opposition devra décrire le(s) motif(s) d'opposition du Client. Si le Client ne s'oppose pas pendant cette période, le(s) nouveau(x) Sous-traitant(s) sera considéré comme accepté.

If a Client objects to the use of a new Splio's Sub-processor, the Parties shall meet within eight (8) working days from the date of the refusal in order to evaluate an alternative solution; if the Client maintains his refusal, and only in this case, each Party may terminate ipso jure (without any formalities) the DPA and the Contract with a three (3) months period notice sent by registered letter with acknowledgment of receipt. Splio will provide our Clients with notice of any new Sub-processors, along with posting such updates here.

Si un Client s'oppose à l'utilisation d'un nouveau Sous-traitant de Splio, les Parties se rencontreront dans un délai de huit (8) jours ouvrables à compter de la date du refus afin d'évaluer une solution alternative ; si le Client maintient son refus, et uniquement dans ce cas, chaque Partie pourra résilier de plein droit (sans aucune

formalité) le DPA et le Contrat moyennant un préavis de trois (3) mois adressé par lettre recommandée avec accusé de réception. Splio informera ses Clients de tout nouveau Sous-traitant, et publiera ces mises à jour ici.

Security and Confidentiality measures | *Mesures de sécurité et de confidentialité*

In the event where Splio contracts with Sub-processors, Splio undertakes to impose on its Sub-processors all necessary obligations to ensure that the confidentiality, security, availability and integrity of the personal data are respected, and that the data cannot be transferred or lent to a third party, or used for purposes other than those set out in the Contract or DPA, and guarantees that the above mentioned Sub-processors will respect their obligations.

Dans le cas où Splio contracte avec des Sous-traitants, Splio s'engage à imposer à ses Sous-traitants toutes les obligations nécessaires pour assurer que la confidentialité, la sécurité, la disponibilité et l'intégrité des données personnelles soient respectées, et que les données ne puissent être transférées ou prêtées à un tiers, ou utilisées à des fins autres que celles prévues dans le Contrat ou le DPA, et garantit que les Sous-traitants susmentionnés respecteront leurs obligations.

Splio's Sub-processors | *Sous-traitants de Splio*

The following is an up-to-date list of the names and locations of Splio's Sub-processors:

La liste suivante est une liste à jour des noms et des localisations des sous-traitants secondaires de Splio : <https://splio.com/en/subprocessors-list/>

Splio's sub-processors.

The following is an up-to-date list of the names and locations of Splio's sub-processors:

Sub-processor name	Sub-processing activities provided	Registered address	Sub-processing activities location	Personal data processed	If transfer OUTSIDE EUROPE, guarantees implemented to allow the transfer [for ex. Data Processing Agreement (DPA) with Standard Contractual Clauses (SCC) of the European Commission (EC) &/or security measures]
Amazon Web Services EMEA SARL	Hosting	38 avenue John F. Kennedy, L-1855, Luxembourg	Europe (Data centers: Paris, Dublin & Frankfurt)	Database of some Splio Group's Clients	AWS GDPR DPA with SCC of the EC of 04/06/2021 Certifications: ISO 9001, ISO 27001, ISO 27017, PCI-DSS, HDS, SOC 1, SOC 2, SOC 3
OVHCloud	Hosting	19 Place Françoise Dorin, 75017, Paris France	Roubaix & Gravelines, Nord-Pas-de-Calais-Picardie, France	Database of some Splio Group's Clients	DPA on line V27/09/2021 referring to the SCC of the EC of 04/06/2021 Certifications : PCI-DSS, ISAE-3402, SSAE-16 Type 1, SOC 2 Type 2, ISO 27001
Google Cloud France SARL (Platform GCP)	Hosting	8 rue de Londres, 75009 Paris, France	ST Ghislain (Belgium)	Database of some Splio Group's Clients	DPA on line V20/09/2022 referring to the SCC of the EC of 04/06/2021 Certifications : ISO/IEC 27001, ISO/IEC 27017, ISO/IEC 27018 et ISO/IEC 27701

Splio Tunisia (affiliate owned at 100% by Splio SAS, France)	Access via secure IP VPN to Splio CRM Copilot [ex-Individuation® Marketing] Clients' applications and Databases	Rue du Lac Huron, Résidence Farah, Bloc A, 3ème étage – 1053 Les Berges du Lac, Tunis, Tunisia, (Tunis Trade Register n°B2445732011)	Tunisia	Database of some Splio Group's Clients	DPA dated 12/01/2022 between Splio Tunisia and Splio Group
Heroku Inc. (currently only for Splio Mobile Wallets SaaS Services)	Application hosting (*PaaS Heroku is hosted on AWS)	1 Market St. Suite 300, San Francisco, CA 94105, USA	Europe (Data center: Ireland)	Splio Mobile Wallets' Clients' Database	Sales Force DPA signed on 23/09/2022 referring to the SCC of the EC of 04/06/2021
MongoDB Inc. (currently only for Splio Mobile Wallets SaaS Services)	Database hosting	MongoDB Limited Building Two, Number One Ballsbridge, Dublin 4, Ireland	Europe (Data center: Ireland)	Splio Mobile Wallets' Clients' Database	MongoDB Cloud Terms of Services & DPA online V16/09/2022 referring to the SCC of the EC of 04/06/2021 Certifications : ISO/IEC 27001 :2013 ; SOC 2
Octolis SAS	Data transformation, structuring, reconciliation, de-duplication and deletion, import, export and segmentation	5 Av. du Général de Gaulle 94160 Saint-Mandé, France	Europe (Data center: Ireland, Dublin-AWS - 38 avenue John F. Kennedy, L-1855, Luxembourg)	Database of some Splio Group's Clients using Splio CDP	DPA with Octolis + AWS GDPR DPA with SCC of the EC Certifications: ISO 9001, ISO 27001, ISO 27017, PCI-DSS, HDS, SOC 1, SOC 2, SOC 3
Microsoft Ireland Operations Ltd.	Files Sharing via [EXT] Customer Library (Sharepoint)	One Microsoft Place,	Europe	Clients' End Users Data: surname & first name, email,	Addendum V04/01/2023 on Data Protection of Microsoft Online

		South County Business Park Leopardstown Dublin 18, D18 P521 Ireland		connection info [IP and location, time & date of connection, connection platform used (mobile, browser, etc.), files accessed]	Services referring to the SCC of the EC of 04/06/2021 Certifications : ISO/IEC 27001, ISO/IEC 27017, ISO/IEC 27018, ISO/IEC 27701, ISO 9001, SOC 1, SOC 2, SOC 3
JotForm Ltd.	To generate Information Form (in relation with Managed Services)	3 Albert Mews, Albert Road, London, England, N4 3RD, United Kingdom	Europe (Data centers: Frankfurt Germany, with possibility in USA)	Info requested in the forms (ex.: surname, first name, emails, phone, address, birthdays of individuals responding to the forms)	EU GDPR DPA signed on 03/11/2022 with SCC of the EC of 04/06/2021
MAKE [previous name: Integromat LLC and Integromat s.r.o.]	To create and send Information form	INTEGROMAT LLC [One World Trade Center 87th Floor, New York, NY 10006 USA] Integromat s.r.o. [Novákových 1954/20a, 180 00 Prague 8, Czech Republic]	Europe Czech Republic	Info requested in the forms (ex.: surname, first name, emails, tel., address, birthdays of individuals responding to the forms)	DPA online V04/01/2022 referring to the SCC of the EC of 04/06/2021
QlikTech France SARL (BLENDR)	To do data integration creating connectors between cloud platforms & via those	Tour Initiale, 1 Terrasse Bellini, 5th Floor, 92919 La	Europe (Data Center Amazon Web Services (AWS) in -Dublin,	Database of some Splio Group's Clients	DPA signed on 29/09/2021 referring to SCC of the EC of 04/06/2021

	connectors process + manage the data integration between Splio and the Clients' system	Défense, Cedex, Paris, France	Ireland; Paris, France (back-up); & Frankfurt, Germany (Blendr only)		
Stonly SAS	Overlays instructional doc. within our application for User onboarding & tutorials on Splio Group's Products utilization Analytics and reporting on usage of the doc.	43 rue du Président Wilson, 92300 Levallois-Perret, France	France (Paris)	Data of Clients' Users who use the doc. : browser and session identifiers. Stonly content browsing activity and inputs (incl. contact form submissions). Targeting events and properties sent by the company to Stonly Language, product feature, early adopter status, new client status, new user status, user & universe ID, email, name of universe, page URL	DPA signed on 15/05/2023 including SCCs of the EC of 04/06/2021 Certifications : Soc 1 Type II, SOC 2 Type II et ISO 27001

N.B.: for Amplitude, Inc. (631Howard Street, Floor 5, San Francisco, CA 94105, USA) [Processing Location: AWS Europe], the Sub-processing Activities are: analytics linked to the use of the services [navigation trends (click on the menu navigation items); rate of use of filter types at Campaign creation; comparison of utilization rates of several platform features] and establish reports to enable Splio to decide on the direction of the evolution of SaaS Services and associated developments. Amplitude does not process any Splio's Clients personal data (e.g no name, phone, gender, birthday date, etc.).

Only processing of technical ID (=digits) which are internal Splio system ID corresponding to the users of the Splio Platform at the Client (their data base identifiers) and universes; and technical ID of Splio's employees.

Other sub-processors [for the personal data of the employees of Splio's Clients where Splio is Data Controller]

Sub-processor name	Sub-processing activities provided	Registered address	Sub-processing activities location	Personal data processed	If transfer OUTSIDE EUROPE, guarantees implemented to allow the transfer [for ex. Data Processing Agreement (DPA) with Standard Contractual Clauses (SCC) of the European Commission (EC) &/or security measures]
Splio Spain S.L.U. (affiliate owned at 100% by Splio SAS France)	Support via Zendesk	c/Córcega 299, Ático 2º, 08008 Barcelona, Spain	Spain	First Name, Surname, emails, phone of employees' contacts of Splio Group's Clients	Not applicable
Zendesk Inc.	Support	Glandore, Fitzwilliam Place, Dublin 2, Ireland	Europe	First Name, Surname, emails, phone of some employees' contacts of Splio Group's Clients	DPA signed on 29/09/2022 referring to the SCC of the EC of 04/06/2021 Certifications : ISO 27001, ISO 27018:2014, ISO 27701:2019, SOC 2 Type II
Twilio Inc. (Zendesk Inc.'s subprocessor)	Voicemail for Splio Support teams (Zendesk Talk module)	375 Beale St, San Francisco, CA 94105, USA	USA	Phone number of Clients calling Splio support, content of voicemails left	Application of Zendesk DPA signed on 29/09/2022 incl. the SCCs of the EC of 04/06/2021

				on the answering machine	
ClientSuccess Inc.	Customer Journey Management	2901 W. Bluegrass Blvd Suite 420 Lehi, UT 84043, USA	USA (USA (ClientSuccess hosts on AWS, in the US-West-2 region)	Client info (such as Business Name, identification info such as first & last name, title or function, email, phone number, Cie, KPIs, etc.), Contract info (amount, services, renewal dates)	DPA signed on 17/07/2023 incl. SCCs of the EC of 04/06/2021 Certifications: SOC 2 Type II and ISO 27001-certified data host provider
Microsoft Ireland Operations Ltd.	Microsoft Office 365 Internal & external Communications (Outlook, Teams, Sharepoint, One Drive)	One Microsoft Place, South County Business Park Leopardstown Dublin 18, D18 P521 Ireland	Europe	First Name, Surname, emails, phone of the contacts of Splio Group's Clients	Microsoft Online Services Data Protection Addendum V04/01/2023 referring to the SCC of the EC of 04/06/2021 (as well as annexes on security measures and additional guarantees) Certifications : ISO/IEC 27001, ISO/IEC 27017, ISO/IEC 27018, ISO/IEC 27701, ISO 9001, SOC 1, SOC 2, SOC 3
DocuSign Inc.	Electronic signature	221 Main Street, Suite 1000, San Francisco, CA 94105, USA	Europe	First Name, Surname & emails of the Clients' signatories	DPA referring to Binding Corporate Rules with "DocuSign's Processor Privacy Code" Certifications: ISO 27001, SOC 1, SOC 2, Cloud Security

					Alliance, Security Trust Assurance & Risk program
Dealhub Ltd.	Quoting Generation	Harokmim 26, Building A, Holon, Israel	France/USA	Identification data: surname, first name, email, company, function (optional), telephone number (optional), contractual info (amount, services, renewal dates) of Splio's Clients and prospects	DPA signed on 16/10/2023 including the SCCs of the EC of 04/06/2021 Certifications: SOC 2 Type II and HIPAA compliant
HubSpot Ireland Ltd	CRM	One Dockland Central, Guild Street, Dublin 1, Ireland	USA	First Name, Surname, emails, tel. of the employees' contacts of Splio Group's Clients	DPA V02/09/2022 signed on 21/09/2022 referring to the SCC of the EC of 04/06/2021 Certifications: SOC 2 Type I & II, SOC 3, ISO 27001
Splio Spain S.L.U. (affiliate owned at 100% by Splio SAS, France)	Invoicing via Oracle Net Suite	c/Córcega 299, Ático 2º, 08008 Barcelona, Spain	Europe	First Name, Surname, emails, phone of the contacts' person for invoicing & DPO of Splio Group's Clients	Not applicable
Oracle Corporation UK Ltd (Net Suite)	Invoicing	Parkway Thames Valley Park Reading RG6 1RA United Kingdom	Europe (Data centers : Dublin & Amsterdam)	First Name, Surname, emails, phone of the contacts' person for invoicing & DPO of Splio Group's Clients	DPA referring to Oracle Processor Code (Binding Corporate Rules for Processors)

					Certifications : SOC 1 Type 2, SOC 2 Type 2 (SSAE18 & ISAE 3402) standards ; ISO 27001; 27018
OVH Telecom (OVH SAS)	Telephony	2 rue Kellermann – 59100 Roubaix, France	Europe	First Name, Surname, emails & phone	DPA online V27/09/2022 referring to the SCC of the EC of 04/06/2021 Certifications: ISO/IEC 27001, attestations SOC 1 TYPE II et SOC 2 TYPE II)
Zoom Video Communications Inc.	Conferencing tool, audio, instant messaging, webinars	55 Almaden Blvd, Suite 600, San Jose, CA 95113, USA	Europe (for Client Content), USA (for other personal data)	First Name, Surname, emails, phone Chat logs, attendee information (screen name, join/leave time) Registration details: name & contact details of meeting or webinar registration invitee	DPA signed on 05/01/2023 referring to the SCC of the EC of 04/06/2021+ Technical and Organizational Security Measures & Transfer Impact Assessment
360 Learning	Hosting	37 rue des Mathurins, 75008 Paris, France	Europe OVH (Data centers: Roubaix/Gravelines, France) Online SAS for the backup infrastructure	Contact data: last & first name, email, company & position, profile picture, phone, link to LinkedIn profile or Twitter account (if given by the User) Data generated by Users in the course of using the	DPA included in the “General Conditions of subscription & use of the SAAS Platform & associated services” No Data transfer

				Services [e.g., usage and connection statistics (if they can be traced back to an identified or identifiable User)]	
Joincube Inc. ("Beamer")	Notification tool on Splio Platform about last features & news on the Splio SaaS services	3800 South Dupont, Dover, DE 19901, USA	USA (Google Cloud - East Region)	Optional: date & time when Beamer script is loaded; preferred language used to access Beamer Optional for Beamer Analytics: Anonymized format IP address; Geo location (approximate); Referring url & domain; device & browser type, operating system Pages visited (optional, for Beamer Segmentation)	DPA signed on 09/01/2023 referring to the SCC of the EC of 04/06/2021 & organizational, operational & technological procedures as are required to comply with the requirements of ISO/IEC 2700
Duoverentures Limited (Simplesat, affiliate)	Customer survey to measure the Clients' overall satisfaction	5/F, Heng Shan Centre, 145 Queen's Road East, Wanchai, Hong Kong	Europe AWS Ireland	Name, Surname, email, connection data (IP address), survey responses e.g. customer feedback, experience ratings	DPA online signed on 26/08/2022 referring to the SCC of the EC of 04/06/2021 & Technical and Organizational Security Measures