

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 2026**

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 & Francfort) | Database of certain Splio Group customers | AWS GDPR CTD with EC CCTs dated 4 June 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 and Gravelines, Nord-Pas-de-Calais-Picardy, France | Database of certain Splio Group customers | CTD V27/09/2021 online, including by reference the EC CCTs 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 certain Splio Group customers | Online CTD V20/09/2022 including, by reference, the EC CCTs of 04/06/2021 |

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| | | | | | Certifications: ISO/IEC 27001, ISO/IEC 27017, ISO/IEC 27018 and ISO/IEC 27701 |
| MongoDB Inc. (only for Splio Mobile Wallets SaaS Services) | Hosting | MongoDB Limited Building Two, Number One Ballsbridge, Dublin 4, Ireland | Europe (Data center: Ireland) | Database of certain Splio Group customers | MongoDB Cloud Terms of Service and Online CTD V16/09/2022 including by reference the EC CCTs of 04/06/2021 Certifications: ISO/IEC 27001:2013; SOC 2 https://trust.mongodb.com/ |
| Microsoft Ireland Operations Ltd. | Sharing files via [EXT] Customer Library (SharePoint) | One Microsoft Place, South County Business Park Leopardstown Dublin 18, D18 P521 Ireland | Europe | Data provided by the Customer if SharePoint files are uploaded only | Addendum V04/01/2023 on Microsoft Online Services Data Protection, including by reference the EC CCTs 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. | Generation of information forms (as part of Managed Services) | 3 Albert Mews, Albert Road, London, England, N4 3RD, United Kingdom | Europe (Data centers: Frankfurt, Germany, with the possibility of the United States) | Data requested by Customers in forms intended for end Customers (e.g. surname, first name, email address, telephone number, address, date of birth) | EU GDPR CTD signed on 03/11/2022 with EC CCT dated 04/06/2021 |

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| | | | | of individuals completing the forms) | |
| MAKE [formerly Integromat LLC et Integromat s.r.o.] | Creating and sending information forms | <p>INTEGROMAT LLC [One World Trade Center 87th Floor, New York, NY 10006 USA]</p> <p>Integromat s.r.o. [Novákových 1954/20a, 180 00 Prague 8, Czech Republic]</p> | <p>Europe</p> <p>Czech Republic</p> | Data requested by Customers in forms intended for end Customers (e.g. surname, first name, email address, telephone number, address, date of birth of individuals completing the forms) | Online CTD V04/01/2022 including, by reference, the EC CCTs of 04/06/2021 |
| Airbyte Inc. | Data replication and transfer (ELT) and Shopify data import | 2261 Market Street, Suite 4381, San Francisco, CA 94114, USA | Europe (data plan) + outside the EU (control plan) | Database of certain Splio Group customers | <p>CTD signed on 29/09/2021 including by reference the EC CCTs of 04/06/2021</p> <p>https://airbyte.com/solutions/data-protection</p> |
| Cloudinary Ltd. | Media management, storage and optimisation (images/videos) | Cloudinary Ltd., 1115 Broadway, New York, NY 10010, USA | Europe (storage possible in the EEA – AWS infrastructure) | IP addresses, technical logs, query metadata | Cloudinary Data Processing Agreement + EU Standard Contractual Clauses (SCCs) 04/06/2021 |

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| Fastly Inc. | CDN, security and optimisation of content delivery | 475 Brannan St. #300, San Francisco, CA 94107, USA | Europe + mondial (edge servers) | IP addresses, technical logs, query metadata | Fastly Data Processing Terms + CCT UE 04/06/2021 |
| Retool Inc. | Internal application creation tool (admin, support, ops) | 1550 Bryant Street, San Francisco, CA 94103, USA | United States | Customer data processed using internal tools (as appropriate) | Data Processing Addendum Retool + CCT UE 04/06/2021 |
| Elastic N.V. (Elastic Cloud) | Search engine, indexing, observability, and analytics (Elastic Cloud) | Keizersgracht 281, 1016 ED Amsterdam, Pays-Bas | Europe | Technical and application data that may include personal data hosted by Splio | |
| Redis Ltd. | In-memory database/application cache (Redis Enterprise/Redis Cloud) | 700 E. El Camino Real, Suite 250, Mountain View, CA 94041, États-Uni | Europe | Cache for client data and application jobs | Data Processing Agreement (DPA), technical and organisational security measures, Redis privacy policy |
| MageMetrics (only for AskMyCRM) | CRM conversation analysis and scoring (AskMyCRM customers) | Route des Flumeaux 48, 1008 Prilly, Suisse | Europe | user ID | GDPR subcontracting agreement including EU collective bargaining agreement 04/06/2021 |

N.B.: for Amplitude, Inc. (631Howard Street, Floor 5, San Francisco, CA 94105, USA) [Processing Location: AWS Europe Region], 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. (wholly owned subsidiary of Splio SAS) | Secure access to applications and data, support via Zendesk & billing via Oracle Net Suite | C/Roger de Lluria,41, 3º, 1ª, 08009 Barcelona, Spain | Spain | Personal data processed on GCP and AWS (under VPN) Billing and support: surname, first name, email address, telephone number, job title (position) | Non applicable |
| Splio Tunisia (wholly owned subsidiary of Splio SAS) | Secure access to Splio's customer applications and databases. | Rue du Lac Huron, Résidence Farah, Bloc A, 3ème | Tunisia + Europe via VPN | Personal data processed on GCP and AWS (under VPN) | CTD dated 12/01/2022 between Splio Tunisia and the Splio Group |

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| | | étage – 1053 Les Berges du Lac, Tunis, Tunisie, (Registre du Commerce Tunis n°B2445732011) | | | |
| Zendesk Inc. | Support | Glandore, Fitzwilliam Place, Dublin 2, Ireland | Europe | Surname, first name, email address, telephone number, other data mentioned for the resolution of the support request | CTD signed on 29/09/2022 including by reference the EC CCTs of 04/06/2021 Certifications: ISO 27001, ISO 27018:2014, ISO 27701:2019, SOC 2 Type II |
| Microsoft Ireland Operations Ltd. | Microsoft Office 365 Internal and external communications and collaboration solutions (Outlook, Teams, SharePoint, One Drive) | One Microsoft Place, South County Business Park Leopardstown Dublin 18, D18 P521 Ireland | Europe | Surname, first name, email address, telephone number, job title (position), other collaboration data. If invited to collaborate on the platform: login information [IP address & location, time/date of login, login platform used (mobile, browser, etc.), files accessed]. | Addendum on Data Protection for Microsoft Online Services V04/01/2023 including by reference the EC CCTs of 04/06/2021 (+ annexes on security measures and additional guarantees) ISO/IEC 27001, ISO/IEC 27017, ISO/IEC 27018, ISO/IEC 27701, ISO 9001, SOC 1, SOC 2, SOC 3 certifications |

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| <p>DocuSign Inc.</p> | <p>Electronic signature</p> | <p>221 Main Street, Suite 1000, San Francisco, CA 94105, USA</p> | <p>Europe</p> | <p>Surname, first name, email address, telephone number, business address, job title, signature</p> | <p>CTD renvoyant aux règles d'entreprise contraignantes de DocuSign avec « Code de confidentialité des processeurs de DocuSign »</p> <p>Certifications : ISO 27001, SOC 1, SOC 2, Cloud Security Alliance, programme Security Trust Assurance & Risk</p> |
| <p>HubSpot Ireland Ltd</p> | <p>CRM</p> | <p>One Dockland Central, Guild Street, Dublin 1, Ireland</p> | <p>United States</p> | <p>Surname, first name, email address, telephone number, job title (position), professional contact details (address, company, etc.)</p> | <p>CTD V02/09/2022 signed on 21/09/2022 including by reference the EC CCTs of 04/06/2021</p> <p>Certifications: SOC 2 Type I & II, SOC 3, ISO 27001</p> |
| <p>Oracle Corporation UK Ltd (Net Suite)</p> | <p>Invoicing</p> | <p>Parkway Thames Valley Park Reading RG6 1RA United Kingdom</p> | <p>Europe (Data centers: Dublin & Amsterdam)</p> | <p>Surname, first name, email address, telephone number, job title (position), work address</p> | <p>CTD referring to Oracle Processor code (binding business rules for Processors)</p> |
| <p>Notion Labs, Inc.</p> | <p>Collaboration and documentation solution</p> | <p>685 Market Street, Suite 300, San Francisco, CA 94105, USA</p> | <p>Europe</p> | <p>Surname, first name, email address, job title, other collaboration data.</p> <p>If invited to collaborate on the platform: login</p> | <p>Certifications: SOC 1 Type 2, SOC 2 Type 2 (SSAE18 & ISAE 3402) standards; ISO 27001; 27018</p> |

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| | | | | information [IP address & location, time/date of login, login platform used (mobile, browser, etc.)]. | |
| Slack Technologies, LLC | Internal communication | Salesforce Tower 60 R801 North Dock Co. Dublin | Europe | If invited to collaborate on the platform: surname, first name, email address, job title, connection information [IP & location, time/date of connection, type of connection used (mobile, browser, etc.) | DPA signed on 03/05/2021 and contract renewed on 03/05/2025 https://slack.com/intl/fr-fr/trust |
| SAS VRM (Upmeet) | Automated note-taking solution | 259, rue Saint-Honoré, Paris, 75001, France | Europe | Surname, first name, content dictated orally and transcribed in writing by Splio Group customers. | https://trust.upmeet.ai/ |
| Okta, Inc. (Auth0) | User authentication and authorisation management solution | 100 First Street, 6th Floor, San Francisco, CA 94105, USA | Europe | Surname, first name, email address, login details [user ID, password, IP address & location, time/date of login, type of connection (mobile, browser, etc.)], other data provided by the client IDP | DPA signed on 28/08/2024 and contract renewed on 28/04/2024 https://security.okta.com/ |

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| <p>Stonly SAS</p> | <p>Overlaying educational documents in our applications to facilitate user onboarding and providing tutorials on how to use Splio Group modules.</p> | <p>43 rue du Président Wilson, 92300 Levallois-Perret, France</p> | <p>France (Paris)</p> | <p>Data of Users (Customers) of the platform using the documentation: language, user ID, universe ID, email, universe name, page URL, connection information [IP & location, activities and contact form submissions, connection time/date, connection platform used (mobile, browser, etc.), files accessed]</p> | <p>CTD signed on 15/05/2023 including the EC CCTs of 04/06/2021</p> <p>Certifications: SOC 1 Type II, SOC 2 Type II and ISO 27001</p> |
| <p>MongoDB Inc. (only for Splio Mobile Wallets SaaS Services)</p> | <p>Database hosting</p> | <p>MongoDB Limited Building Two, Number One Ballsbridge, Dublin 4, Ireland</p> | <p>Europe (Data center: Ireland)</p> | <p>Surname, first name, email address, login details [username, password, IP address & location, time/date of login]</p> | <p>MongoDB Cloud Terms of Service and Online CTD V16/09/2022 including by reference the EC CCTs of 04/06/2021</p> <p>Certifications: ISO/IEC 27001:2013; SOC 2</p> <p>https://trust.mongodb.com/</p> |
| <p>Mailjet SAS (Sinch) (only for the Predictive AI / CDP platform)</p> | <p>Email notification and tracking tool</p> | <p>13-13 bis rue de l'Aubrac, 75012 Paris, France</p> | <p>Europe (Belgium)</p> | <p>email, campaign statistics, email delivery and read tracking</p> | <p>CTD / DPA Mailjet + CCT UE 04/06/2021</p> |