Personal Data Subprocessors.

Données Personnelles 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: **October 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? *Qui est 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/liste-sous-traitants/

Produits Splio concernés *Applicable Splio Products*

La colonne « Produits concernés » indique, à titre informatif, les Produits Splio pour lesquels le Sous-traitant concerné peut être utilisé. Les Produits Splio applicables à chaque Client sont ceux définis dans le Contrat, les Devis, les Bons de Commande et toute documentation contractuelle associée.

The "Applicable Splio Products" column is provided for information purposes only and identifies the Splio Products for which the relevant Sub-processor may be used. The Splio Products applicable to each Client are those specified in the Contract, Order Forms, Quotations and any associated contractual documentation.

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	Product(s) concerned	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	Marketing Automation Mobile Wallets Loyalty	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
	Splio Agent	Data processing using large language models (LLMs) for analysis and conversational support.			Information contained in conversations, knowledge base.	

OVHCloud	Splio Mobile Wallets	Hosting	19 Place Françoise Dorin, 75017, Paris France	Roubaix and Gravelines, Nord-Pas-de-Calais-Picardy, France	IP addresses, technical logs, request metadata	CTD V27/09/2021 online, including by reference the EC CCTs of 04/06/2021Certifications: PCI-DSS, ISAE-3402, SSAE-16 Type 1, SOC 2 Type 2, ISO 27001
Google Cloud France SARL (Platform GCP)	Marketing Automation Predictive AI	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 Certifications: ISO/IEC 27001, ISO/IEC 27017, ISO/IEC 27018 and ISO/IEC 27701
MongoDB Inc.	Splio Mobile Wallets	Hosting	MongoDB Limited Building Two, Number One Ballsbridge, Dublin 4, Ireland	Europe (AWS - Paris)	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.	All products	Sharing files via [EXT] Customer Library (SharePoint)	One Microsoft Place, South County Business Park Leopardstown	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

			Dublin 18, D18 P521 Ireland			Certifications: ISO/IEC 27001, ISO/IEC 27017, ISO/IEC 27018, ISO/IEC 27701, ISO 9001, SOC 1, SOC 2, SOC 3
JotForm Ltd.	Only for Custom Integration in MA with Agency or Professional Services	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 of individuals completing the forms)	EU GDPR CTD signed on 03/11/2022 with EC CCT dated 04/06/2021
MAKE [formerly Integromat LLC et Integromat s.r.o.]	Only for Custom Integration in MA with Agency or Professional Services	Creating and sending information forms	INTEGROMAT LLC [One World Trade Center 87th Floor, New York, NY 10006 USA] Integromat s.r.o. [Novákových	Europe Czech Republic	Data requested by Customers in forms intended for end Customers (e.g. surname, first name, email address, telephone number, address,	Online CTD V04/01/2022 including, by reference, the EC CCTs of 04/06/2021

			1954/20a, 180 00 Prague 8, Czech Republic]		date of birth of individuals completing the forms)	
Airbyte Inc.	Marketing Automation Predictive AI	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	CTD signed on 29/09/2021 including by reference the EC CCTs of 04/06/2021 https://airbyte.com/solutions/data-protection
Cloudinary Ltd.	Splio Mobile Wallets	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
Fastly Inc.	Marketing Automation	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.	Marketing Automation Predictive AI	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)	Predictive AI	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.	Marketing Automation Splio Mobile Wallets	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	Ask My CRM	CRM conversation analysis and scoring (AskMyCRM customers)	Route des Flumeaux 48, 1008 Prilly, Suisse	Europe	User ID, chat history, analytics data	GDPR subcontracting agreement including EU collective bargaining agreement 04/06/2021
Deepl SE	Multilingual marketing automation templates	Automated translation of content via API	Maarweg 165, 50825 Cologne, Allemagne	Europe	Email Design Content without Personal Data	
Wiz, Inc. (a subsidiary of Google Cloud / Alphabet since March 2026)	All products	Detection and response to cloud vulnerabilities and threats, code security, CNAPP, CSPM, CIEM, DSPM	11 bis Rue Portalis, 75008 Paris	Europe	IP addresses, technical logs, request metadata, and any sensitive data discovered during	SOC 2 Type II, SOC 3, ISO 27001, ISO 27017, ISO 27018, ISO 27701, PCI DSS, CSA STAR https://trust.wiz.io/

					the scan, if present	

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 étage – 1053 Les Berges du Lac, Tunis, Tunisie, (Registre du Commerce Tunis n°B2445732011)	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

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
Docusign Inc.	Electronic signature	221 Main Street, Suite 1000, San Francisco, CA 94105, USA	Europe	Surname, first name, email address, telephone number, business address, job title, signature	CTD renvoyant aux règles d'entreprise contraignantes de Docusign avec « Code de confidentialité des processeurs de DocuSign » Certifications : ISO 27001, SOC 1, SOC 2, Cloud Security Alliance,

					programme Security Trust Assurance & Risk
HubSpot Ireland Ltd	CRM	One Dockland Central, Guild Street, Dublin 1, Ireland	European Union (Germany)	Surname, first name, email address, telephone number, job title (position), professional contact details (address, company, etc.)	CTD V02/09/2022 signed on 21/09/2022 including by reference the EC CCTs of 04/06/2021 Certifications: SOC 2 Type I & II, SOC 3, ISO 27001
Oracle Corporation UK Ltd (Net Suite)	Invoicing	Parkway Thames Valley Park Reading RG6 1RA United Kingdom	Europe (Data centers: Dublin & Amsterdam)	Surname, first name, email address, telephone number, job title (position), work address	CTD referring to Oracle Processor code (binding business rules for Processors)
Notion Labs, Inc.	Collaboration and documentation solution	685 Market Street, Suite 300, San Francisco, CA 94105, USA	Europe	Surname, first name, email address, job title, 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.)].	Certifications: SOC 1 Type 2, SOC 2 Type 2 (SSAE18 & ISAE 3402) standards; ISO 27001; 27018

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
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/

Stonly SAS	Overlaying educational documents in our applications to facilitate user onboarding and providing tutorials on how to use Splio Group modules.	43 rue du Président Wilson, 92300 Levallois-Perret, France	France (Paris)	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]	CTD signed on 15/05/2023 including the EC CCTs of 04/06/2021 Certifications: SOC 1 Type II, SOC 2 Type II and ISO 27001
MongoDB Inc. (only for Splio Mobile Wallets SaaS Services)	Database hosting	MongoDB Limited Building Two, Number One Ballsbridge, Dublin 4, Ireland	Europe (Data center: Paris)	Surname, first name, email address, login details [username, password, IP address & location, time/date of login]	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/
Mailjet SAS (Sinch) (only for the Predictive AI / CDP platform)	Email notification and tracking tool	13–13 bis rue de l'Aubrac, 75012 Paris, France	Europe (Belgium)	email, campaign statistics, email delivery and read tracking	CTD / DPA Mailjet + CCT UE 04/06/2021

Amazon Web Services EMEA SARL	Web traffic filtering and protection (application firewall)	38 avenue John F. Kennedy, L-1855, Luxembourg	Global (AWS points of presence)	IP addresses, technical logs, request metadata	AWS GDPR CTD in accordance with the EC's CCTs of 4 June 2021 Certifications: ISO 9001, ISO 27001, ISO 27017, PCI-DSS, HDS, SOC 1, SOC 2, SOC 3
Sentry	Application error monitoring and performance tracking	Sentry 45 Fremont Street, 8th Floor San Francisco, CA 94105	Europe	Application telemetry data: errors/exceptions, stack traces, IP address, user agent, OS/browser,	ISO/IEC 27001, SOC 2 Type I, SOC 2 Type II, HIPAA https://sentry.io/trust/