

# RGSB Sub-Processor Details

*The following document applies to Reward Gateway For Small Business (hereinafter referred to as: RGSB) customers.*

Reward Gateway uses certain sub-processors to process Customer Personal Data and assist Reward Gateway with providing the Service(s) defined under the Data Processing Addendum. This document lists the third party sub-processors used by RGSB as of the date accessed.

## Due Diligence

In accordance with ISO27001 and Reward Gateway's Supplier Management Policy, a commercially reasonable process is used to evaluate the security, privacy and confidentiality practices of proposed sub-processors that will or may have access to or process Customer Personal Data.

## Contractual Safeguards

Reward Gateway enters into contracts with its sub-processors which restrict their use of Customer Personal Data and require them to take appropriate security measures to protect it in addition to other obligations relating to compliance with Data Protection Laws.

## How to Receive Notification of a Change in Sub-processors

If you are a RGSB Customer with a signed Data Processing Addendum in place, in the event that Reward Gateway intends to allow access to your Customer Personal Data by any new sub-processors (i.e. any other than Reward Gateway's Affiliates or the sub-processors listed on this document on the date the Data Processing Addendum was signed), Reward Gateway will inform you at least 30 days before the new sub-processor processes any Customer Personal Data by sending you an email to your Notification Email Address containing the name and location of the relevant sub-processor and the activities it will perform.

To enable this process to run smoothly, we ask that you ensure that your Notification Email Address is correct and up to date.

## Right to Object to a New Sub-processor

As a Customer you may object to a change in sub-processor within 30 days of receiving notice of such changes by terminating the Agreement immediately upon written notice.

## Version Control

Version	Date	Changes
1.0	12/10/2021	Initial version

## Affiliates

The following are defined as Reward Gateway affiliates. They will process Customer Personal Data in routine course of business activities, such as account management, technical support, product development etc.

Affiliate	What processing (and storage) locations (e.g. country/state) are used?	What lawful transfer mechanism is used for personal data outside the EU/EEA area? (if applicable)	Effective Date
RG Engagement Group Ltd	United Kingdom	N/A	Existing
International Benefits Holdings Ltd	United Kingdom	N/A	Existing
Asperity Employee Benefits Group Ltd	United Kingdom	N/A	Existing
Reward Gateway Pty Ltd	Australia	Standard Contractual Clauses	Existing
Reward Gateway (USA) Inc	United States	Standard Contractual Clauses	Existing
Reward Gateway (UK) Ltd Branch	Bulgaria	N/A	Existing

## Sub-Processors

Other than the authorised sub-processors listed, Reward Gateway owns or controls access to the infrastructure that is used to host Customer Personal Data submitted to the Services. In order to provide some Services, Reward Gateway must work with third-parties. Only the sub-processors listed require access to Customer Personal Data to conduct this processing.

Sub-processor	What is the scope of the processing?	What types of personal data is processed?	What processing (and storage) locations (e.g. country/s tate) are used?	How is personal data transferred to or accessed by the sub-processor?	What lawful transfer mechanism is used for personal data outside the EU/EEA area? (if applicable)	What supplementary measures are in place to protect the rights of data subjects? (if applicable)	Effective Date
<b>PlanHat AB</b> Kungsgatan 64, C/O IOFFICE Business Center 111 22 Stockholm Sweden	Customer success software which helps us to manage our client portfolios more strategically.	Name, contact information, billing information, product usage related data sets related	EU, Sweden	Electronically transferred from Reward Gateway to PlanHat via API	Standard Contractual Clauses.	<p><b>Organisational</b></p> <ul style="list-style-type: none"> <li>Data in Planhat is managed and viewed by our Client Success managers and Product Managers to support clients to become more successful using RGSB. Only teams with a requirement will have access to PlanHat.</li> </ul> <p><b>Contractual</b></p> <ul style="list-style-type: none"> <li>Data Processing Agreement</li> <li>Data is stored in EU</li> </ul> <p><b>Technical</b></p> <ul style="list-style-type: none"> <li>SOC2 certified</li> <li>Controls listed at <a href="https://www.planhat.com/security-statement/">https://www.planhat.com/security-statement/</a></li> <li>Traffic encrypted in transit over public networks using TLS 1.2</li> </ul>	17/11/2021
<b>HubSpot, Inc.</b> 25 1st Street Cambridge, MA 02141 United States	Customer Relationship Management software which helps our marketing and sales to manage relationships with clients and prospects.	Lead and Client name, contact details and other legal information (e.g. company name).  Does not include any	United States	Electronic collection through landing page forms, emails and RewardGateway.com website forms.	Standard Contractual Clauses.	<p><b>Organisational</b></p> <ul style="list-style-type: none"> <li>Data in HubSpot is managed and viewed by our Marketing, Client Success and Product managers as well as our Sales Consultants to message leads/client representatives with useful information, marketing materials</li> </ul> <p><b>Contractual</b></p> <ul style="list-style-type: none"> <li>Data Processing Agreement</li> <li>Standard Contractual Clauses</li> </ul>	Existing

		employee information.				<b>Technical</b> <ul style="list-style-type: none"> <li>• SOC2 Certified</li> <li>• Controls listed at <a href="https://legal.hubspot.com/security">https://legal.hubspot.com/security</a></li> <li>• Traffic encrypted in transit over public networks using TLS 1.2</li> </ul>	
<b>Chargebee, Inc.</b> 340 S. Lemon Avenue, Suite #1537, Walnut, California 91789	Subscription billing and revenue management software to manage the subscription and billing of RGSB clients.	Billing details, billing contact name and contact details.	US, EU and APAC	Electronic collection through the sign-up process form and from inside the RGSB Product via the Chargebee API.	Standard Contractual Clauses.	<b>Organisational</b> <ul style="list-style-type: none"> <li>• Access to Chargebee restricted to those who need it as part of their regular duties</li> </ul> <b>Contractual</b> <ul style="list-style-type: none"> <li>• Data Processing Agreement</li> </ul> <b>Technical</b> <ul style="list-style-type: none"> <li>• SOC2 Certified</li> <li>• Controls listed at <a href="https://www.chargebee.com/security/">https://www.chargebee.com/security/</a></li> <li>• PCI DSS Level 1 Service Provider</li> <li>• Traffic encrypted in transit over public networks using TLS 1.2</li> </ul>	Existing
<b>Salesforce.com, inc.</b> 1 Market St Ste 300 San Francisco CA 94105 United States	Used in the Sales process and to manage the ongoing relationship.	Name and contact information, support case details.	United States	Electronic collection through email and support portal.	Binding Corporate Rules and Standard Contractual Clauses.	<b>Organisational</b> <ul style="list-style-type: none"> <li>• Data in Salesforce relates to commercial relationships only</li> </ul> <b>Contractual</b> <ul style="list-style-type: none"> <li>• Salesforce provides a disclosure process or will self-report to EU Data Protection Authorities if unable to notify the customer directly. See <a href="#">Principles for Government Requests for Customer Data</a></li> <li>• Salesforce has Binding Corporate Rules in place across the organisation.</li> <li>• Do not have a transparency report.</li> </ul> <b>Technical</b> <ul style="list-style-type: none"> <li>• Traffic encrypted in transit over public networks using TLS 1.2</li> </ul>	Existing
<b>Atlassian Pty. Ltd.</b> c/o Atlassian, Inc. 1098 Harrison Street	Used to manage customer support cases	Name and contact information, support case details.	United States	Electronic collection through email and support portal.	Standard Contractual Clauses.	<b>Organisational</b> <ul style="list-style-type: none"> <li>• Data in Atlassian is for escalated support cases and occasionally references clients and/or employees via personal data.</li> </ul>	Existing

San Francisco CA 94103 United States	by technical teams.					<p><b>Contractual</b></p> <ul style="list-style-type: none"> <li>Atlassian provides a disclosure process (where possible.) See <a href="#">Guidelines for Law Enforcement</a></li> <li>A <a href="#">transparency report</a> is available.</li> </ul> <p><b>Technical</b></p> <ul style="list-style-type: none"> <li>Traffic encrypted in transit over public networks using TLS 1.2+ with Perfect Forward Secrecy (PFS)</li> <li>AES256 is used to store data at-rest.</li> <li>No control over encryption keys used.</li> </ul>	
<p><b>Mailgun Technologies Inc.</b> 548 Market St. #43099 San Francisco CA 94104 United States</p>	Sending of email marketing and service messages.	Name and email address, marketing preferences.	Germany	Electronically transferred from Reward Gateway to Mailgun, via API	Standard Contractual Clauses.	<p><b>Organisational</b></p> <ul style="list-style-type: none"> <li>Data in emails sent through Mailgun is minimal.</li> <li>We use links to our platform, where user authentication is performed, where possible.</li> <li>Message bodies are retained for 7 days, message meta-data is retained for 30 days.</li> <li>Suppression list is maintained until the end of the contract.</li> </ul> <p><b>Contractual</b></p> <ul style="list-style-type: none"> <li>Data is hosted in European Union reducing international transfers to/from the United States.</li> <li>Do not have a transparency report.</li> </ul> <p><b>Technical</b></p> <ul style="list-style-type: none"> <li>Traffic encrypted in transit over public networks using TLS1.2.</li> <li>Mailgun sends email to our members, via SMTP which uses opportunistic TLS. The use of TLS for these emails will be dependent on the recipient's email server.</li> <li>AES256 is used to store data at-rest.</li> <li>No control over encryption keys used.</li> </ul>	Existing
<p><b>Amazon Web Services EMEA SARL.</b> 38 Avenue John F. Kennedy, L-1855, Luxembourg</p>	Cloud hosting provision used for supplying new and existing functionality on	Our platform and databases are run on compute and storage functions within	Ireland Germany	Electronically transferred from Reward Gateway to Amazon.	Standard Contractual Clauses.	<p><b>Organisational</b></p> <ul style="list-style-type: none"> <li>Data is hosted in European Union reducing international transfers to/from the United States.</li> <li>Amazon provides <a href="#">Guidelines for Law Enforcement</a>.</li> </ul>	Existing

	Reward Gateway.	Amazon Web Services.				<ul style="list-style-type: none"> <li>• A <a href="#">transparency report</a> with figures across all its products (inc. Amazon Echo and Fire services) is available.</li> </ul> <p><b>Contractual</b></p> <ul style="list-style-type: none"> <li>• Data Processing Agreements and Standard Contractual Clauses</li> </ul> <p><b>Technical</b></p> <ul style="list-style-type: none"> <li>• Data is imported directly into our servers from customer servers via SFTP or uploaded to our servers over HTTPS through Reward Manager. Administration over SSH.</li> <li>• Internal server to server communication within Amazon Web Services all uses TLS, again with certificates managed by Reward Gateway.</li> <li>• All server partitions are encrypted with AES256, with keys managed by AWS KMS.</li> </ul>	
<b>Zendesk International Ltd</b> 55 Charlemont Place, Saint Kevin's, Dublin, D02 F985 Ireland	Complete customer support solution, including; chat, voice, cases and success portal.	Name and contact information, support case details.	EEA United States	Electronically transferred from Reward Gateway to Zendesk, via API  Electronic collection through email, chat and support portal.	Binding Corporate Rules and Standard Contractual Clauses.	<p><b>Organisational</b></p> <ul style="list-style-type: none"> <li>• Data in Zendesk is for active client and employee support cases.</li> <li>• Zendesk provide a disclosure process or will self-report to EU Data Protection Authorities if unable to notify the customer direct (where possible).</li> </ul> <p><b>Contractual</b></p> <ul style="list-style-type: none"> <li>• Zendesk have Binding Corporate Rules in place across the organisation. See <a href="https://www.zendesk.co.uk/company/privacy-and-data-protection/#corporate-rules">[https://www.zendesk.co.uk/company/privacy-and-data-protection/#corporate-rules]</a></li> <li>• Data Processing Agreements and Standard Contractual Clauses</li> <li>• Zendesk use Binding Corporate Rules internally</li> </ul> <p><b>Technical</b></p> <ul style="list-style-type: none"> <li>• Data is encrypted in transit over public networks.</li> <li>• AES256 is used to store data at-rest.</li> <li>• No control over encryption keys used.</li> </ul>	Existing