

# Reward Gateway Sub-Processor Details

Reward Gateway uses certain sub-processors to process Client 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 Reward Gateway 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 Client Personal Data.

## Contractual Safeguards

Reward Gateway enters into contracts with its sub-processors which restrict their use of Client 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 Reward Gateway Customer with a signed Data Processing Addendum in place, in the event that Reward Gateway intends to allow access to your Client 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 Client 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.

## Affiliates

The following are defined as Reward Gateway affiliates. They may process Client 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 if the location does not offer adequate data protection? (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 (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 Client 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 Client 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/state) are used?	How is personal data transferred to or accessed by the sub-processor?	What lawful transfer mechanism is used for personal data if the location does not offer adequate protection? (if applicable)	Effective Date
<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. Certification under the EU/UK-U.S. Data Privacy Framework.	Existing

<p><b>Atlassian Pty. Ltd.</b></p> <p>Atlassian, Inc. 1098 Harrison Street San Francisco CA 94103 United States</p>	Used to manage customer support cases by technical teams.	Name and contact information, support case details.	United States	Electronic collection through email and support portal.	Standard Contractual Clauses. Certification under the EU/UK-U.S. Data Privacy Framework.	Existing
<p><b>Emailcentre UK Ltd.</b></p> <p>West Tithe Pury Hill Alderton Road Paulerspury Towcester NN12 7LS United Kingdom</p>	Sending email marketing and service messages.	Name and email address, marketing preferences.	United Kingdom	Electronically transferred from Reward Gateway to EmailCentre, via API	N/A	Existing
<p><b>Mailgun Technologies Inc.</b></p> <p>548 Market St. #43099 San Francisco CA 94104 United States</p>	Sending email marketing and service messages.	Name and email address, marketing preferences.	Germany	Electronically transferred from Reward Gateway to Mailgun, via API	Standard Contractual Clauses.	30/01/2019
<p><b>Amazon Web Services EMEA SARL.</b></p> <p>38 Avenue John F. Kennedy L-1855 Luxembourg</p>	Cloud hosting provision used for supplying new and existing functionality on Reward Gateway.	Our platform and databases are run on compute and storage functions within Amazon Web Services.	Ireland Germany	Electronically transferred from Reward Gateway to Amazon.	Standard Contractual Clauses.	23/02/2019
<p><b>Zendesk International Ltd</b></p> <p>55 Charlemont Place Saint Kevin's Dublin D02 F985 Ireland</p>	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. Certification under the EU/UK-U.S. Data Privacy Framework.	08/06/2019

<b>WalkMe, Inc</b> 71 Stevenson Street Floor 20 San Francisco CA 94105	Contextual help, support and assistance for customer administrators	Reward Gateway user IDs of customer administrators with access to Reward Manager	United States	Electronically transferred from Reward Gateway to WalkMe	Standard Contractual Clauses. Certification under the EU/UK-U.S. Data Privacy Framework.	27/02/2020
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## Version Control

Version	Date	Changes
4.0	23/7/2024	<ul style="list-style-type: none"> <li>Added information in respect of certification under the EU/UK-U.S. Data Privacy Framework.</li> </ul>
3.0	22/2/2024	<ul style="list-style-type: none"> <li>Amended affiliates section to reflect that no transfers of personal data take place between Reward Gateway UK and Reward Gateway USA / AUS (Reward Gateway USA / AUS removed as affiliates)</li> </ul>
2.0	01/10/2022	<ul style="list-style-type: none"> <li>Remove ClientSuccess Inc. (replaced with Salesforce)</li> <li>Move 'Supplementary Measures' to a separate Transfer Risk Assessment document.</li> </ul>
1.8	21/06/2021	<ul style="list-style-type: none"> <li>Correct 'lawful transfer mechanism' heading.</li> </ul>
1.7	13/01/2021	<ul style="list-style-type: none"> <li>Include Supplementary Measures</li> </ul>
1.6	25/09/2020	<ul style="list-style-type: none"> <li>Changes to reflect 'Schrems 2' CJEU judgement, replacing Privacy Shield with BCR/SCCs.</li> </ul> <p>Removal of Reward Gateway Macedonia</p>
1.5	28/01/2020	<ul style="list-style-type: none"> <li>Removed LiveChat (replaced by Zendesk) &amp; The Bunker (replaced by Amazon Web Services).</li> <li>Added Client Success, Inc and WalkMe, Inc.</li> </ul>
1.4	23/07/2019	<ul style="list-style-type: none"> <li>Added ZenDesk Inc.</li> </ul>
1.3	25/02/2019	<ul style="list-style-type: none"> <li>Added Reward Gateway affiliates and clarified non-EEA data transfers.</li> </ul>
1.2	23/01/2019	<ul style="list-style-type: none"> <li>Added Mailgun Technologies Inc., Amazon Web Services EMEA SARL and additional 'Effective Date' column.</li> </ul> <p>Formatting changes</p>
1.1	13/09/2018	<ul style="list-style-type: none"> <li>Provided additional information and legal basis for subprocessors following feedback from customers.</li> </ul> <p>Some formatting changes.</p>
1.0	01/03/2018	<ul style="list-style-type: none"> <li>Initial version</li> </ul>