

# Reward Gateway Sub-Processor Details

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 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 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 Reward Gateway 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  |
|---------|------------|--|
| 1.6     | 25/09/2020 | Changes to reflect 'Schrems 2' CJEU judgement, replacing Privacy Shield with BCR/SCCs.<br>Removal of Reward Gateway Macedonia        |
| 1.5     | 28/01/2020 | Removed LiveChat (replaced by Zendesk) & The Bunker (replaced by Amazon Web Services).<br>Added Client Success, Inc and WalkMe, Inc. |
| 1.4     | 23/07/2019 | Added ZenDesk Inc.   |
| 1.3     | 25/02/2019 | Added Reward Gateway affiliates and clarified non-EEA data transfers.  |
| 1.2     | 23/01/2019 | Added Mailgun Technologies Inc., Amazon Web Services EMEA SARL and additional 'Effective Date' column. Formatting changes            |
| 1.1     | 13/09/2018 | Provided additional information and legal basis for subprocessors following feedback from customers. Some formatting changes.        |
| 1.0     | 01/03/2018 | 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 is the legal basis for transfer of 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/state) are used? | How is personal data transferred to or accessed by the sub-processor? | What is the legal basis for transfer of personal data outside the EU/EEA area? (if applicable)  | Effective Date |
|---|---|---|--|---|---|----------------|
| <b>Salesforce.com, inc.</b><br>1 Market St Ste 300<br>San Francisco<br>CA 94105<br>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.               | Salesforce.com uses Binding Corporate Rules and Standard Contractual Clauses.<br><br>Use of modern encryption at rest and in transit. | Existing       |
| <b>Atlassian Pty. Ltd.</b><br>c/o Atlassian, Inc.<br>1098 Harrison Street<br>San Francisco<br>CA 94103<br>United States | Used to track some customer support information.                  | Name and contact information, support case details. | United States  | Electronic collection through email and support portal.               | Standard Contractual Clauses.<br><br>Use of modern encryption at rest and in transit.   | Existing       |

|  |  |   |                      |  |  |            |
|--|--|---|----------------------|--|--|------------|
| <b>Emailcentre UK Ltd.</b><br>West Tithe Pury Hill<br>Alderton Road,<br>Paulerspury<br>Towcester<br>NN12 7LS<br>United Kingdom | Sending of 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   |
| <b>Mailgun Technologies Inc.</b><br>548 Market St.<br>#43099<br>San Francisco<br>CA 94104<br>United States                     | Sending of email marketing and service messages.   | Name and email address, marketing preferences.  | Germany              | Electronically transferred from Reward Gateway to Mailgun, via API     | We send from within Mailgun's EU region.<br><br>Standard Contractual Clauses.<br><br>Use of modern encryption at rest and in transit.  | 30/01/2019 |
| <b>Amazon Web Services EMEA SARL.</b><br>38 Avenue John F. Kennedy, L-1855,<br>Luxembourg                                      | 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<br>Germany   | Electronically transferred from Reward Gateway to Amazon.              | We operate from within Amazon's EU data centres.<br><br>Standard Contractual Clauses.<br><br>Use of modern encryption at rest and in transit - keys managed and controlled by Reward Gateway | 23/02/2019 |
| <b>Zendesk International Ltd</b>   | Complete customer support solution,  | Name and contact  | EEA<br>United States | Electronically transferred from  | Zendesk has Binding Corporate Rules and  | 08/06/2019 |

|  |  |   |               |   |   |            |
|--|--|---|---------------|---|---|------------|
| 55 Charlemont Place, Saint Kevin's, Dublin, D02 F985 Ireland                           | including; chat, voice, tickets and success portal   | information, support case details.  |               | Reward Gateway to Zendesk, via API<br><br>Electronic collection through email, chat and support portal. | Standard Contractual Clauses.<br><br>Use of modern encryption at rest and in transit. |            |
| <b>WalkMe, Inc</b><br>71 Stevenson Street, Floor 20<br>San Francisco, CA 94105         | Contextual help, support and assistance for customer administrators.                         | Email address of customer administrators with access to Reward Manager            | United States | Electronically transferred from Reward Gateway to WalkMe  | Standard Contractual Clauses.<br><br>Use of modern encryption at rest and in transit. | 27/02/2020 |
| <b>ClientSuccess, Inc.</b><br>313 South 740 East, Suite 2<br>American Fork, Utah 84003 | Customer success software which helps us to manage our client portfolios more strategically. | Name and contact information of business contacts for customers in UK and Ireland | United States | Electronically transferred from Reward Gateway to ClientSuccess via API                                 | Standard Contractual Clauses.<br><br>Use of modern encryption at rest and in transit. | 27/02/2020 |