

# 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
1.4	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

SEO Reward Gateway DOOEL	Macedonia	Standard Contractual Clauses	Existing
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## 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> 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.	Salesforce have an EU US Privacy Shield certificate  <a href="https://www.privacysield.gov/participant?id=a2zt00000000KzLyAAK">https://www.privacysield.gov/participant?id=a2zt00000000KzLyAAK</a>	Existing
<b>Atlassian Pty. Ltd.</b> c/o Atlassian, Inc. 1098 Harrison Street San Francisco CA 94103 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.	Atlassian have an EU US Privacy Shield certificate  <a href="https://www.privacysield.gov/participant?id=a2zt000000008RdQAAU">https://www.privacysield.gov/participant?id=a2zt000000008RdQAAU</a>	Existing
<b>LiveChat, Inc.</b> One International Place	To provide live chat	Name and contact information, support case details.	United States	Electronic collection through live chat widget.	LiveChat have an EU US Privacy Shield certificate	Existing

Suite 1400 Boston MA 02110 United States	support functionality.				<a href="https://www.privacyshield.gov/participant?id=a2zt0000000L16xAAC">https://www.privacyshield.gov/participant?id=a2zt0000000L16xAAC</a>	
<b>Emailcentre UK Ltd.</b> West Tithe Pury Hill Alderton Road, Paulerspury Towcester NN12 7LS 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>The Bunker Ultra Secure Hosting Ltd.</b> Ash Radar Station Sandwich Kent CT13 0PL United Kingdom	Managed hosting provision & technical support.	Our platform and databases are run on compute and storage functions within The Bunker.	United Kingdom	Our servers are located at The Bunker.	N/A	Existing
<b>Mailgun Technologies Inc.</b> 548 Market St. #43099 San Francisco CA 94104 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.  Mailgun have an EU US Privacy Shield certificate  <a href="https://www.privacyshield.gov/participant?id=a2zt0000000PCbmAAG">https://www.privacyshield.gov/participant?id=a2zt0000000PCbmAAG</a>	30/01/2019

<p><b>Amazon Web Services EMEA SARL.</b> 38 Avenue John F. Kennedy, L-1855, Luxembourg</p>	<p>Cloud hosting provision used for supplying new and existing functionality on Reward Gateway.</p>	<p>Our platform and databases are run on compute and storage functions within Amazon Web Services.</p>	<p>Ireland Germany</p>	<p>Electronically transferred from Reward Gateway to Amazon.</p>	<p>We operate from within Amazon's EU data centres.</p>	<p>23/02/2019</p>
<p><b>Zendesk International Ltd</b> 55 Charlemont Place, Saint Kevin's, Dublin, D02 F985 Ireland</p>	<p>Complete customer support solution, including; chat, voice, tickets and success portal</p>	<p>Name and contact information, support case details.</p>	<p>EEA United States</p>	<p>Electronically transferred from Reward Gateway to Zendesk, via API  Electronic collection through email, chat and support portal.</p>	<p>Zendesk have a EU US Privacy Shield certificate <a href="https://www.privacysield.gov/participant?id=a2zt00000000TOjeAAG">https://www.privacysield.gov/participant?id=a2zt00000000TOjeAAG</a></p>	<p>08/06/2019</p>