

SUBPROCESSORS FOR THE SPOTME ENTERPRISE ENGAGEMENT PLATFORM

Approval and review	Details
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Approval authority	CEO
Owner	Legal & Procurement Manager <legal@spotme.com>

1 SCOPE

This documentation describes the subprocessors and certain other entities authorized to access information provided to SpotMe by its customers, referred to as “Customer Data”. “Customer Data” means all information processed or stored on computers or other electronic media by customers or by SpotMe on customers’ behalf and provided to SpotMe in the course of customers’ use of SpotMe’s services, as well as any information derived from such information. Customer Data includes, without limitation: (a) information provided to SpotMe by Users (as defined in the contractual documents) or by other third parties; and (b) personal data from such Users or other third parties.

2 PROCESS FOR MAKING AN OBJECTION

a) Make a formal objection. Not all of the subprocessors listed below process Customer Data for all services offered by SpotMe. Customers may provide a reasonable objection only to any new subprocessors that would have access to Customer Data by sending a written message to privacy@spotme.com within ten (10) business days after receipt of notice of a change.

b) SpotMe response. SpotMe will use commercially reasonable efforts to make available or recommend to Customer a commercially reasonable change in SpotMe’s services to avoid processing of Customer Data by the objected-to new subprocessor without unreasonably burdening SpotMe or the Customer. For the avoidance of doubt, a “reasonable objection” to a subprocessor must show an objective, evidence-based reason to believe that such new subprocessor fails to provide sufficient guarantees to implement the appropriate technical and organizational measures in such a manner that processing will meet the requirements of the EU Data Protection Laws and ensure the protection of the rights of the data subject(s).

c) Resolution. Customer understands that the listed subprocessors are essential for providing the SpotMe services. If after ninety (90) days from receipt of the objection notice, Customer has a reason to believe that corrective action taken by SpotMe with regard to the objected-to subprocessor still does not provide sufficient guarantees that the processing complies with EU Data Protection Laws, Customer may request termination of the affected services which cannot be provided by SpotMe without the use of the objected-to new subprocessor (under the applicable Order Form(s) or Statement(s) of Work). Such termination request shall be in writing. In the event of termination pursuant to this request, such termination shall not be a termination for breach, and SpotMe will refund Customer any prepaid fees covering the remainder of the term of such Order Form(s) or Statement(s) of Work following the effective date of termination with respect to such terminated services, without imposing a penalty for such termination on Customer.

3 SUBPROCESSORS

3.1 SUBPROCESSORS WHO PROVIDE TECHNOLOGIES TO POWER CERTAIN SPOTME SERVICES

The following subprocessors provide technologies used to deliver specific SpotMe services. If you deploy one of the services below, the subprocessor(s) identified for that service may process, store, or otherwise access Customer Data in the course of helping to provide that service.

Subservice organization	Services in scope	Location of processing
Amazon Web Services, Inc. (or any of its affiliates in the respective location as indicated here)	Cloud hosting services Email delivery services	United States (based on hosting location contract with customer additional locations are EU, Australia, Singapore)
Aiven Ltd.	Usage statistics	United States (based on hosting location contract with customer additional locations are EU, Australia, Singapore)
MailChimp, Inc.	Email delivery services	United States
Wordly, Inc.	Captioning services	United States
Datadog, Inc.	Metrics, monitoring, and logs	United States
Microsoft Corporation	Communication services and data visualisation	EU

3.2 SUBPROCESSORS WHO PROVIDE ANCILLARY SERVICES TO SUPPORT SPOTME SERVICES

The following subprocessors provide ancillary services to help support, operate, and maintain the Services. In such cases, the subprocessor(s) identified may process, store, or otherwise access limited Customer Data in the course of providing their ancillary services.

Subservice organization	Services in scope	Location of processing
Google LLC	Corporate organization and communication system; Processing of data subject requests via email	United States, EU
Atlassian, Inc.	Customer support system; Processing of data subject and customer support requests	United States, EU
Appcues, Inc.	Administrative user tools; User onboarding activities	United States
Intercom, Inc.	Users messaging platform, used for communication with users (chat)	United States
Cyclr Systems Ltd.	Application for computer system integrations	United Kingdom
Typeform SL	Online forms for collection, storage and management of customer feedback	United States, EU
Dropbox, Inc.	Corporate organization and communication system; If requested by Customer, used for sharing of participant lists or other business material	United States, EU
Kantata, Inc.	Operations Management and Team Collaboration Tool; If requested by Customer, used for sharing of participant lists or other business material	United States

Hubspot, Inc.	Email delivery for Customer user feedback and engagement	United States, EU
OneTrust LLC	Cookie consent management platform	United States, EU
Salesforce, Inc.	Services support	United States, EU

3.3 SPOTME CONTROLLED SUBSIDIARIES AND AFFILIATES

The following SpotMe controlled subsidiaries and affiliates support, operate, deliver, and maintain the services and in the course of doing so may process, store, or otherwise access Customer Data. This data resides only in SpotMe facilities, on SpotMe systems, and subject to SpotMe policies and supervision.

Subservice organization	Location of processing
SpotMe SA	Switzerland
SpotMe, Inc.	United States
SpotMe Pte. Ltd.	Singapore
SpotMe EOOD	EU

4 CHANGE LOG

Date of change	Change
June 23, 2023	Removed: SoftLayer Technologies, Inc. Added: Wordly, Inc.; Datadog, Inc.; Aiven Ltd.; Hubspot, Inc.; OneTrust LLC; Salesforce, Inc.
December 22, 2023	Typeform SL: updated location of processing
May 7, 2025	Added Microsoft Corporation in the subservice organization list Removed Nexmo, Inc., StreamYard, Inc. Added clarity in Services in scope descriptions
April 17, 2026	Removed: EEG Enterprises, Inc. Added clarity in Services in scope descriptions