

Attachment 5B - List of Subprocessors and Data Processing Instructions

In addition to what is already established in the Data Processing Agreement, the following will serve as an Instruction for Data Processing:

- The Service will process personal data to confirm the identity of the user upon logging in to the system and to enable providing adequate support
- The Personal data that is processed is Name, Telephone number and email address for the users the Customers have granted Service access to
- From the Customer's perspective the information can be in regards to employees but also a member from an external workforce such as a consultant or other service provider. This
- Each user and it's corresponding data is permanently deleted 4-6 months after they their access has been revoked.
- The system logs when a user is logging in to the system. These logs are saved for six months and then automatically deleted. Spendency have no obligation to provide these logs to the Customer and will only do so under when extraordinary circumstances so require.
- Data uploaded into the Service will never be transferred to a third country (a country that is not a member of the EU or EEA and has not received an EC Adequacy Decision),

Spendency is a data processor and engages certain onward subprocessors that may process personal data submitted to Spendency's services by the Customer. These subprocessors are listed below, with a description of the service and the location where data is hosted.

Last updated: 2023-02-21

Subprocessor	Description	Personal data	Data storage location
Amazon Web Services EMEA SARL , Company Registration Number: FC034225 , 38 Avenue John F. Kennedy, Luxembourg 1855 , Luxembourg	The service is used for provisioning and operations of server and infrastructure services.	Name, Telephone number and Email address is stored for those that the Customer adds as a user of the Service. In addition the Customer has the possibility to upload additional personal data that should be analysed in the Spendency Service.	EU
Google LLC , Company Registration Number: 3582691 , 251 Little falls Drive, Wilmington, New Castle , Delaware, 19808, USA	Google Workspace is used for e-mail, calendar services and for file storage of documents.	Name, Telephone number and Email address will be present in some documents stored on Google Workspace. In addition the emails sent to Spendency may contain other personal data	EU
Intercom R&D Unlimited Company , Company Registration Number: IE538158 , 2nd Floor, Stephen Court, 18-21 St. Stephen's Green , Dublin 2, Republic of Ireland	The service is used for customer support and communication.	Name, Telephone number and Email address is stored for all Spendency users and Name and Email address for any other person contacting us via one of the email addresses connected to Intercom. In addition the messages sent to Spendency may contain additional personal data.	EU
Slack Technologies Limited , Company Registration Number: IE558379 , One Park Place, 4th Floor , Hatch Street Dublin 2 , Ireland	The service is used for communication and system monitoring	Email address	EU
Oleksandr Yamkovyi, CRN: 523736420 woj. POMORSKIE, pow. Gdańsk, gm. Gdańsk, miejsc. Gdańsk, ul. Gospody, nr 14E, lok. 19, 80-340, Poland	The service is used for product development.	All personal data according to above	EU
Codest Ltd CRN:12590542 , 182-184 High Street North, E6 2JA London, UK	The service is used for product development.	All personal data according to above	EU
Onventis GmbH, Gropiusplatz 10, 70563 Stuttgart , Germany	The service is used to distribute email newsletters, for product development and to provide a full Source-to-Pay experience when agreed upon	All personal data according to above	EU

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<https://www.onventis.com/analytics-subprocessors/>