



## List of vendors processing personal data

Name of the Company	Description of the service and location	More information	Processing location and transfer mechanism
<b>SUBPROCESSORS USED ACROSS THE ALL LUMOA CUSTOMERS</b>			
<p>MICROSOFT IRELAND OPERATIONS LIMITED</p> <p>IE 8256796 U</p> <p>Ireland</p> <p>ONE MICROSOFT PLACE, SOUTH COUNTY BUSINESS PARK, LEOPARDSTOWN, DUBLIN 18</p>	<p><b>Hosting &amp; services</b></p> <ul style="list-style-type: none"> <li>Azure app services, Azure hosted Kubernetes clusters, Self-hosted virtual machines, Azure database for MySQL, Translator Text API, Cognitive Services / Speech to text</li> <li>Text API: Microsoft has an algorithm to mask Private data masked. After processing, the data is NOT stored at Microsoft.</li> <li>Azure OpenAI Service / Microsoft Cognitive Services: Service is used using prompts, the data is not used for training OpenAI models NOR sent to OpenAI. Microsoft is storing prompts and completions for maximum of 30 days to monitor for content and/or behaviours that suggest use of the service in a manner that violate product terms. Authorized Microsoft employees may review prompt and completion data that has triggered our automated systems to investigate and verify potential abuse. For customers who have deployed Azure OpenAI Service in the European Economic Area, the authorized Microsoft employees will be located in the European Economic Area.</li> <li>Azure AI Speech models: Transcribing audio files. No input/output data is retained by Speech service after the completion of a translation request.</li> </ul> <p><b>Description</b></p> <ul style="list-style-type: none"> <li>Headquarters in the US</li> <li>Personal data stored within EU/EEA</li> </ul> <p><b>Security measures:</b></p>	<p><b>Data stored and processed:</b></p> <ul style="list-style-type: none"> <li>Feedback and related background variables that is stored in Lumoa</li> <li>Lumoa user details</li> </ul> <p><b>Information on the agreement</b></p> <ul style="list-style-type: none"> <li>DPA signed (English language) <a href="https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA">https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA</a></li> <li>Microsoft is committing that they will challenge every government request for public sector or enterprise customer data – from any government – where there is a lawful basis for doing so. This strong commitment goes beyond the proposed recommendations of the EDPB. <a href="https://blogs.microsoft.com/on-the-issues/2020/11/19/defending-your-data-edpb-gdpr/">https://blogs.microsoft.com/on-the-issues/2020/11/19/defending-your-data-edpb-gdpr/</a></li> <li>Second, Microsoft will provide monetary compensation to these customers’ users if we disclose their data in response to a government request in violation of the EU’s General Data Protection Regulation (GDPR). This commitment also exceeds the EDPB’s recommendations. It shows Microsoft is confident that we will protect our public sector and enterprise customers’ data and not expose it to inappropriate disclosure (source: Same as above).</li> <li>FAQ on data privacy of Azure OpenAI Service: <a href="https://learn.microsoft.com/en-gb/legal/cognitive-services/openai/data-privacy">https://learn.microsoft.com/en-gb/legal/cognitive-services/openai/data-privacy</a></li> </ul>	<p><b>Processing location:</b></p> <ul style="list-style-type: none"> <li>Personal data processed within EU/EEA</li> <li>Lumoame has a paid subscription that guarantees that the personal data will be processed within EU/EEA.</li> </ul> <p><b>Transfer mechanism:</b></p> <ul style="list-style-type: none"> <li>SCC signed; new version based on 2021/914/EC</li> </ul>

	<ul style="list-style-type: none"> <li>Data is encrypted in transit and in rest</li> </ul>	<ul style="list-style-type: none"> <li>FAQ on data privacy and security of AI Speech: <a href="https://learn.microsoft.com/en-us/legal/cognitive-services/speech-service/speech-to-text/data-privacy-security?context=%2Fazure%2Fai-services%2Fspeech-service%2Fcontext%2Fcontext">https://learn.microsoft.com/en-us/legal/cognitive-services/speech-service/speech-to-text/data-privacy-security?context=%2Fazure%2Fai-services%2Fspeech-service%2Fcontext%2Fcontext</a></li> </ul>	
<p><b>MONGODB LIMITED</b></p> <p>IE 9793087 U</p> <p>Ireland</p> <p>BUILDING TWO, NUMBER ONE BALLSBRIDGE, BALLSBRIDGE, DUBLIN 4</p>	<p><b>Database</b></p> <ul style="list-style-type: none"> <li>MongoDB is run in within Microsoft Azure. This means that the data is hosted in the same location and with same logic as Microsoft services.</li> </ul> <p><b>Description</b></p> <ul style="list-style-type: none"> <li>Personal data stored within EU/EEA.</li> <li>Headquarters in the US</li> <li>MongoDB personnel does not have access to data stored in MongoDB database</li> </ul> <p><b>Security measures:</b></p> <ul style="list-style-type: none"> <li>Same as for Microsoft Azure</li> </ul>	<p><b>Data stored and processed:</b></p> <ul style="list-style-type: none"> <li>Feedback and related background variables that is stored in Lumoa</li> <li>Lumoa user details</li> </ul> <p><b>Information on the agreement</b></p> <ul style="list-style-type: none"> <li>Data Processing Terms signed as part of Terms of Service: <a href="https://www.mongodb.com/legal/dpa">https://www.mongodb.com/legal/dpa</a></li> <li>Technical and organizational security measures: <a href="https://www.mongodb.com/technical-and-organizational-security-measures">https://www.mongodb.com/technical-and-organizational-security-measures</a></li> <li>As an additional technical measure Lumoame has entirely restricted the access by all MongoDB personnel as described in the point 4.2.4 in under the above link in Technical and organization security measures</li> <li>MongoDB has confirmed to Lumoa that neither MongoDB nor any other affiliated US entity (collectively, "MongoDB") that processes or has access to personal data that is transferred to MongoDB fall under any of the definitions in 50 U.S.C. § 1881(b)(4) or are directly subject to 50 U.S.C. § 1881a (FISA 702), and MongoDB has not been required to cooperate with US authorities conducting surveillance of communications under EO 12.333.</li> </ul>	<p><b>Processing location:</b></p> <ul style="list-style-type: none"> <li>Personal data processed within EU/EEA</li> <li>Lumoame has a paid subscription that guarantees that the data will be processed within EU/EEA.</li> </ul> <p><b>Transfer mechanism:</b></p> <ul style="list-style-type: none"> <li>SCC signed; new version based on 2021/914/EC</li> </ul>
<p><b>CloudAMQP by</b></p> <p>84codes AB Torsgatan 26 113 21 Stockholm</p>	<p><b>Message queue</b></p> <ul style="list-style-type: none"> <li>RabbitMQ, Message queue for evening the load to API.</li> </ul> <p><b>Description</b></p>	<p><b>Data processed:</b></p> <ul style="list-style-type: none"> <li>Feedback and related background variables that is stored in Lumoa</li> <li>Lumoa user details</li> </ul>	<p><b>Processing location:</b></p> <ul style="list-style-type: none"> <li>Personal data processed within EU/EEA</li> <li>Lumoame has a paid subscription that</li> </ul>

<p>Sweden VAT ID: SE556898078201</p>	<ul style="list-style-type: none"> <li>• Headquarters in Sweden</li> <li>• Personal data stored within EU/EEA</li> </ul> <p><b>Security measures:</b></p> <ul style="list-style-type: none"> <li>• Data is encrypted in transit and in rest</li> </ul>	<p><b>Information on the agreement</b></p> <ul style="list-style-type: none"> <li>• DPA signed</li> <li>• <a href="https://www.cloudamqp.com/legal/terms_of_service.html#dpa">https://www.cloudamqp.com/legal/terms_of_service.html#dpa</a></li> </ul>	<p>guarantees that the personal data will be processed within EU/EEA.</p>
<p><b>MailGun Technologies Inc.</b></p> <p>San Antonio HQ 112 E Pecan St, #1135 San Antonio, TX, 78205</p>	<p><b>Partner for sending email notifications</b></p> <ul style="list-style-type: none"> <li>• E.g. weekly reports and event notifications to Lumoa users</li> </ul> <p><b>Description</b></p> <ul style="list-style-type: none"> <li>• Headquarters in the US</li> <li>• Personal data stored within EU/EEA.</li> <li>• The data of EU customers, i.e. Lumoame is hosted within EU.</li> </ul> <p><b>Security measures</b></p> <ul style="list-style-type: none"> <li>• Recipient email address is stored in pseudonymised format</li> <li>• Data encryption</li> <li>• Data minimization principle</li> </ul>	<p><b>Data stored and processed</b></p> <ul style="list-style-type: none"> <li>• Email address of Lumoa user, individual feedback (if the that is separately enabled to the alert email)</li> </ul> <p><b>Information on the agreement</b></p> <ul style="list-style-type: none"> <li>• DPA, SCC and EU model clause signed</li> <li>• DPA: <a href="https://www.mailgun.com/legal/dpa/">https://www.mailgun.com/legal/dpa/</a></li> </ul>	<p><b>Processing location:</b></p> <ul style="list-style-type: none"> <li>• Personal data processed within EU/EEA.</li> </ul> <p><b>Transfer mechanism:</b></p> <ul style="list-style-type: none"> <li>• SCC signed; new version based on 2021/914/EC</li> </ul>
<p><b>INTERCOM R&amp;D UNLIMITED COMPANY</b></p> <p>IE 3273393E H</p> <p>2nd Floor Stephen Court 18-21 St. Stephen's Green DUBLIN, 2 Ireland</p>	<p><b>In-product onboarding, product announcements, personalised support and notifications</b></p> <p><b>Description</b></p> <ul style="list-style-type: none"> <li>• The company is headquartered in the US.</li> <li>• Intercom will not store or track any information from your own customers or the feedback they send to your company</li> </ul> <p><b>Security measures</b></p> <ul style="list-style-type: none"> <li>• Data encrypted in transit</li> <li>• <a href="https://www.intercom.com/security">https://www.intercom.com/security</a></li> </ul>	<p><b>Data stored and processed:</b></p> <ul style="list-style-type: none"> <li>• Lumoa users name, email address, IP address</li> </ul> <p><b>Information on the agreement</b></p> <ul style="list-style-type: none"> <li>• European data hosting Addendum: <a href="https://www.intercom.com/legal/european-data-hosting-addendum">https://www.intercom.com/legal/european-data-hosting-addendum</a></li> <li>• The above link also includes link to DPA as well as list of subprocessors</li> <li>• DPA: <a href="https://www.intercom.com/legal/data-processing-agreement">https://www.intercom.com/legal/data-processing-agreement</a></li> </ul>	<p><b>Processing location:</b></p> <ul style="list-style-type: none"> <li>• Lumoa uses an instance that processes all the data in the EU.</li> </ul> <p><b>Transfer mechanism:</b></p> <ul style="list-style-type: none"> <li>• SCC signed; new version based on 2021/914/EC</li> </ul>
<p><b>Cloudflare, Inc.</b></p>	<p><b>DDoS protection</b></p> <ul style="list-style-type: none"> <li>• Cloudflare services are used to provide DDoS protection, Web Application Firewall, API rate limiting and Content Delivery Network services</li> <li>• All web traffic is transmitted through Cloudflare systems and limited amount of personal data (User agent, End-user IP address, browser and</li> </ul>	<p><b>Data stored and processed:</b></p> <ul style="list-style-type: none"> <li>• User agent, End-user IP address, browser and operating system details</li> </ul> <p><b>Information on the agreement</b></p> <ul style="list-style-type: none"> <li>• GDPR compliance - <a href="https://www.cloudflare.com/trust-hub/gdpr/">https://www.cloudflare.com/trust-hub/gdpr/</a></li> </ul>	<p><b>Processing location:</b></p> <ul style="list-style-type: none"> <li>• Cloudflare Data Localization Suite is configured to process data only within EU/EEA - <a href="https://www.cloudflare.com/data-localization/">https://www.cloudflare.com/data-localization/</a></li> </ul>

	<p>operating system details) is processed to provide protection to Lumoa systems</p> <ul style="list-style-type: none"> <li>It is estimated that Cloudflare powers around 13% of all websites currently in existence. While the list of users is exhaustive, it does include several big-brand names such as Roche, ZenDesk, Mozilla, UpWork, 9GAG, US Xpress, and more.</li> </ul> <p><b>Description</b> Cloudflare, Inc. is an American web infrastructure and website security company that provides content delivery network and DDoS mitigation service</p> <p><b>Security measures</b></p> <ul style="list-style-type: none"> <li>Data is encrypted in transit and in rest</li> <li><a href="https://www.cloudflare.com/gdpr/introduction/">https://www.cloudflare.com/gdpr/introduction/</a></li> </ul>	<ul style="list-style-type: none"> <li>ISO 27001:2013, ISO 27701:2019, SOC 2 Type II, PCI DSS 3.2.1 certifications - <a href="https://www.cloudflare.com/trust-hub/compliance-resources/">https://www.cloudflare.com/trust-hub/compliance-resources/</a></li> <li>CLOUDFLARE DATA PROCESSING ADDENDUM SIGNED. DPA also includes SCC –</li> <li>DPA - <a href="https://www.cloudflare.com/cloudflare-customer-dpa/">https://www.cloudflare.com/cloudflare-customer-dpa/</a></li> </ul>	<p><b>Transfer mechanism:</b></p> <ul style="list-style-type: none"> <li>SCC signed, new version based on 2021/914/EC - <a href="https://www.cloudflare.com/cloudflare-customer-scc/">https://www.cloudflare.com/cloudflare-customer-scc/</a></li> </ul>
<b>SUBPROCESSORS USED IF YOU ARE USING A SPECIFIC LUMOA SERVICE</b>			
<p><b>Integromat and Make.com by Celonis Inc.</b></p> <p>87th floor, New York, New York 10 007, United State</p>	<p><b>Automation service</b></p> <ul style="list-style-type: none"> <li>Used to automate process flows internally.</li> </ul> <p><b>Description</b></p> <ul style="list-style-type: none"> <li>Headquarters in US</li> <li>Personal data stored within EU/EEA</li> </ul> <p><b>Security measures:</b></p> <ul style="list-style-type: none"> <li>Usage control, Access control</li> <li>Data encrypted at rest</li> <li>Contractual order control</li> <li>Review of Article 32 GDPR</li> <li><a href="https://www.make.com/technical-and-organizational-measures.pdf">https://www.make.com/technical-and-organizational-measures.pdf</a></li> </ul>	<p><b>Data processed:</b></p> <ul style="list-style-type: none"> <li>Feedback and related background variables that is stored in Lumoa</li> <li>Lumoa user details</li> <li>Service not used for all customers, used e.g. for pulling feedback data from public sources and feeding data back to customer systems</li> </ul> <p><b>Information on the agreement</b></p> <ul style="list-style-type: none"> <li>DPA signed: <a href="https://www.make.com/data-processing-agreement.pdf">https://www.make.com/data-processing-agreement.pdf</a></li> </ul>	<p><b>Processing location:</b></p> <ul style="list-style-type: none"> <li>Personal data processed within EU/EEA</li> </ul> <p><b>Transfer mechanism:</b></p> <ul style="list-style-type: none"> <li>SCCs signed: <a href="https://www.make.com/standard-contractual-clauses.pdf">https://www.make.com/standard-contractual-clauses.pdf</a></li> </ul>
<p><b>Inscripta Oy</b></p>	<p><b>Speech recognition service</b></p> <ul style="list-style-type: none"> <li>Used only for transcribing speech to text.</li> </ul> <p><b>Description</b></p> <ul style="list-style-type: none"> <li>Headquarters in Finland</li> </ul>	<p><b>Data processed:</b></p> <ul style="list-style-type: none"> <li>Call recording, video recordings</li> <li>Data not stored</li> </ul> <p><b>Information on the agreement</b></p> <ul style="list-style-type: none"> <li>DPA signed</li> </ul>	<p><b>Processing location:</b></p> <ul style="list-style-type: none"> <li>Personal data processed within EU/EEA</li> </ul>

	<b>Security measures:</b> <ul style="list-style-type: none"> <li>• Data is encrypted in transit</li> <li>• Data does not rest but is deleted after processing</li> </ul>		
enuvo GmbH	<b>Partner for surveying</b> <ul style="list-style-type: none"> <li>• Used as a complementary surveying solution (surveyhero)</li> </ul> <b>Description</b> <ul style="list-style-type: none"> <li>• Headquarters in Switzerland</li> </ul> <b>Security measures</b> <ul style="list-style-type: none"> <li>• Data encrypted in transit and rest</li> </ul>	<b>Data processed and stored:</b> <ul style="list-style-type: none"> <li>• Data stored: Responses to surveys</li> </ul> <b>Information on the agreement</b> <ul style="list-style-type: none"> <li>• DPA signed</li> </ul>	<b>Processing location:</b> <ul style="list-style-type: none"> <li>• Personal data processed within EU/EEA</li> </ul>

EXTERNAL DEVELOPERS		
Artemi Tsinkel (Tsario) (business ID 8971913115) ul. Marsz. J. Piłsudskiego 74 lokal 320, 50-020 Wrocław	<ul style="list-style-type: none"> <li>• Developer having access to customer data</li> <li>• Location Poland</li> </ul>	<ul style="list-style-type: none"> <li>• DPA signed</li> </ul>
Twoj StartUp  ul. Żurawia 6/12, apt. 766, 00-503 Warsaw,  KRS 0000442857 NIP (Taxpayer ID No.): 5213641211, REGON number: 146433467 BDO number: 000460502	<ul style="list-style-type: none"> <li>• Tester from Poland</li> </ul>	<ul style="list-style-type: none"> <li>• DPA signed</li> </ul>