

Cappfinity Limited Personal Data Subprocessors Notice

Effective from: 13th May 2022

1. Introduction

We respect the privacy rights of individuals and are committed to handling personal information responsibly and in accordance with applicable law. This notice provides details of the subprocessors of personal data that may be used by Cappfinity Limited in relation to your personal data, the services for which we use them. We have Data Processing Addendums / Data Processing Agreements in place with each of our subprocessors.

2. Why we use subprocessors

Cappfinity Limited uses subprocessors to process personal data (and other types of data) in order to enable us to provide our services and manage our business in the best possible way for our clients, customers, users and employees. These subprocessors provide data services that we are unable to provide ourselves for reasons of economic viability, efficiency, technological capability or otherwise.

3. Cappfinity Limited subprocessors

The subprocessors used by Cappfinity Limited are listed in the table below:

Subprocessor name	Purpose of subprocessing	Primary location of subprocessing	Primary location of data storage
Microsoft Azure	SaaS Hosting	Europe/Ireland	Europe/Ireland
Mailgun	Email Delivery	Europe	Europe
Twilio	SMS Delivery	United States	United States
Hubspot	Marketing Automation	United States	United States
Auth0	Identity Management	Europe	Europe
Vonage	Live Video Collaboration	Worldwide	United States
Snowflake	Data warehousing and reporting	Europe/Ireland	Europe/Ireland
Auth0	Identity Management (Koru Only)	United States	United States
Amazon Web Services	SaaS Hosting (Koru only)	United States	United States
Mailchimp	Email Delivery (Koru Only)	United States	United States
Zoom	Video Conferencing (Virtual Assessment Centre only)	Worldwide	United States
Northpass	Provision of Learning Management System (VEE only)	United States	United States

4. Contact details

Please address any questions or requests relating to this Notice to the Cappfinity Limited Data Protection Officer, who can be contacted here - by email: dpo@cappfinity.com