Sub-processors and sub-contractors Policy

Workbooks Online limited ("Workbooks") uses certain sub-processors and sub-contractor to assist it in providing the Workbooks Services as described in the Master Services Agreement (include link) ("MSA").

Defined terms used herein shall have the same meaning as defined in the MSA.

What are sub-processors and sub-contractors
A sub-processor is a third-party data processor engaged by Workbooks who has or potentially will have access to or process Protected Data. Workbooks engages different types of sub-processors to perform various functions as explained below.

Workbooks refers to third parties that do not have access to or process Protected Data but who are otherwise used to provide the Services as "sub-contractor" and not sub-processors.

Due Diligence:
Workbooks undertakes to use a commercially reasonable selection process by which it evaluates the security, privacy and confidentiality practices of proposed sub-processors that will or may have access to or process Protected Data.

Contractual Safeguards:
Workbooks requires its sub-processors to satisfy equivalent obligations as those required from Workbooks (as a Data Processor) as set forth in Workbooks Data Processing Addendum (part of the MSA), including but not limited to the following requirements:

- process Personal Data in accordance with data controller's documented instructions (as communicated in writing to the relevant sub-processor by Workbooks);
- in connection with their sub=processing activities, use only personnel who are reliable and subject to a contractually binding obligation to observe data privacy and security, to the extent applicable, pursuant to applicable data protection laws;
- Provide regular training in security and data protection to personnel to whom they grant access to Personal Data;
- implement and maintain appropriate technical and organizational measures (including measures consistent with those to which Workbooks is contractually committed to adhere insofar as they are equally relevant to the sub-processor's processing of Personal Data on Workbooks behalf)
- promptly inform Workbooks about any actual or potential security breach; and
- cooperate with Workbooks in order to deal with requests from data controllers, data subjects or data protection authorities, as applicable.

This policy does not give Workbooks Customers any additional rights or remedies and should not be construed as a binding agreement. The information herein is only provided to illustrate Workbooks engagement process for sub-processors as well as to provide the actual list of third party sub-processors and sub-contractor used by Workbooks as of the date of this policy.

Appointing and changing sub-processes

Workbooks will notify customers in advance (via email) and via this policy to the appointment of any new sub-Processor or changes to any existing sub-processor. The customer may **object to the appointment of or; any**

change in the sub-processor where it has reasonable grounds for doing so and in such circumstances, Workbooks shall be entitled to address the objection through one of the following options at its sole discretion:

1. *cease to use the relevant sub-processor*
2. *take steps suggested by the Customer to address the objection;*
3. *cease to provide the particular Services which involves the relevant sub-processor.*

Service specific sub-processors

Workbooks works with certain third parties to provide specific functionality within the Services. These providers are the sub-processors set forth below. In order to provide the relevant functionality these sub-processors access Protected Data. Their use is limited to the indicated Services.

Entity	Purpose	Applicable Services	Entity Country	Location of Data
Communigator Limited & Carenza Limited	Communigator Limited (Communigator) provide the GatorMail and Web Insights elements of the Workbooks Marketing Automation Service. Protected Data such as email addresses and contact details will be synchronised between the Workbooks platform and the infrastructure maintained by Communigator. Carenza are the hosting provider used by Communigator	GatorMail & Web Insights	United Kingdom	United Kingdom
InvisibleCRM	InvisibleCRM develop the Workbooks Outlook Connector (WOC) which is a software plug-in for Outlook on Windows used to synchronise information between Microsoft Outlook and the Workbooks platform. Typically InvisibleCRM would not have access to Protected Data, but may be engaged to troubleshoot a specific problem which may result in Protected Data being made available in the form of log files or data files to enable them to fix a problem	WOC	United States & Ukraine	Ukraine
InvisibleCRM	InvisibleCRM develop and host the Workbooks Exchange Synchronisation Service (WESS) This service synchronises information between the Workbooks platform and Microsoft Exchange on behalf of a client. InvisibleCRM do have access to Protected Data as part of this platform The data is hosted in Dublin, Ireland but may be accessed remotely by InvisbleCRM staff in the USA and Ukraine	WESS	United States & Ukraine	Dublin, Ireland

Workbooks Online Inc.	Workbooks Online Inc is the US company which represents Workbooks in North America and is partly owned by Workbooks Online Limited. Workbooks Online Inc, will have access to Protected Data for customers sold via and supported in North America. They may occasionally have access to Protected Data of customers based inside the EEA for support and operational purposes	ALL	United States	UK
Tibco	Tibco Software Ireland Limited provide the Tibco Cloud Integration Platform, which is used by some clients to connect Workbooks to third-party applications and databases	Scribe	Ireland	Ireland

Sub-contractors

As explained above, Workbooks also uses certain "sub-contractor" to assist in the operations necessary to provide the Workbooks Services as described in the MSA. The following is a list (as of the date of this policy) of the names and locations of material third-party sub-contractor. Sub-contractors do not have access to Protected Data

Entity Name	Entity Type	Entity Country(ies)
Equinix, Inc.	Data Centre	United Kingdom

Other sub-processors

Workbooks uses some cloud-based applications in the day to day operations of its business. Customer Protected Data may be stored in these applications at various times.

Entity	Purpose	Entity Country	Location of Data
Microsoft	Office 365	USA	United Kingdom