



USER DATA SUBPROCESSOR LIST

Kognity Teaching and Learning Platform

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In order to provide our services in the best way, we work with selected and trusted third party service providers acting as our subprocessors, including for hosting our services, user analytics and to manage back-end systems processing user data. Adequate oversight and, where applicable, legally valid transfer mechanisms are always implemented in these cases.

Subprocessor	Function	Processing location	Transfer safeguards
84codes AB - RabbitMQ	Hosting	USA	Standard Contractual Clauses (SCC)
Amazon Web Services EMEA SARL	Hosting	USA	EU-US Data Privacy Framework Certified
Atlassian Pty Ltd - JIRA	Internal records	USA	EU-US Data Privacy Framework Certified
Braze, Inc.	User communications	USA	EU-US Data Privacy Framework Certified
Cloudflare, Inc.	Platform resilience	USA	EU-US Data Privacy Framework Certified
Cloudling Limited - HelpHero	Teacher tutorial	USA	Standard Contractual Clauses (SCC)
Datadog, Inc.	Hosting	USA	EU-US Data Privacy Framework Certified
Fivetran, Inc.	Data ingestion	USA	EU-US Data Privacy Framework Certified
Functional Software, inc. - Sentry	Hosting	USA	EU-US Data Privacy Framework Certified
Google Cloud EMEA Limited - Google Cloud Platform	Internal records	USA	EU-US Data Privacy Framework Certified
Google Cloud EMEA Limited - Google Workspace	Infrastructure	USA	EU-US Data Privacy Framework Certified
Holistics Software Pte Ltd	Analytics/Business intelligence	USA	Standard Contractual Clauses (SCC)
Intercom R&D Unlimited Company	User support	USA	EU-US Data Privacy Framework Certified
Mixpanel, Inc.	User analytics	USA	EU-US Data Privacy Framework Certified
Pickaxe LLC - Iterate	Surveys	USA	EU-US Data Privacy Framework Certified
PostHog Inc.	User analytics	USA	EU-US Data Privacy Framework Certified
Redis EMA LTD	Hosting	USA	Standard Contractual Clauses (SCC)
SFDC Ireland Limited - Heroku	Hosting	USA	Binding Corporate Rules (BCR) & EU-US Data Privacy Framework Certified
SFDC Ireland Limited - Tableau	Analytics/Business intelligence	USA	Binding Corporate Rules (BCR) & EU-US Data Privacy Framework Certified
Twilio Inc. - Sendgrid	Email provider	USA	Binding Corporate Rules (BCR) & EU-US Data Privacy Framework Certified

We may also from time to time engage wholly-owned subsidiaries to perform limited internal processing activities in connection with delivering our products and services, and those subsidiaries may qualify as subprocessors.

Subprocessor	Processing location	Transfer safeguards
Kognity USA, Inc.	USA	Standard Contractual Clauses (SCC)
Kognity UK Limited	UK	N/A (adequacy decision)