



## PebblePad US Sub-Processor Details

These sub-processors are utilised to provide core platform services such as hosting data and providing transactional email services, these affect all end users on the PebblePad platform, most commonly students and teaching staff.

| Name                     | The scope and purpose   | Activities   | Data Subjects   | Categories of data   | Location | Contact  |
|--------------------------|---|--|---|--|----------|--|
| Amazon Web Services, Inc | Main application hosting and storage location. All data held by PebblePad is stored and processed by AWS. | Application hosting, data storage, content delivery. | <ul style="list-style-type: none"><li>All PebblePad users</li></ul> | <ul style="list-style-type: none"><li>Name</li><li>Email Address</li><li>Course details/Module Name</li><li>Username</li><li>All user entered content.</li></ul> | USA      | Via <a href="mailto:datasecurity@pebblepad.com">datasecurity@pebblepad.com</a> |
| Google, LLC              | Storage of offsite backups of all PebblePad data for disaster recovery.                                   | Storage of backup data.                              | <ul style="list-style-type: none"><li>All PebblePad users</li></ul> | <ul style="list-style-type: none"><li>Name</li><li>Email Address</li><li>Course details/Module Name</li><li>Username</li><li>All user entered content</li></ul>  | USA      | Via <a href="mailto:datasecurity@pebblepad.com">datasecurity@pebblepad.com</a> |





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|--------------------------|---|---|---|---|-----|--|
| Brightcove, Inc          | Any audio/video uploaded by PebblePad users must be standardised to ensure it can be played by the application. | Conversion of video content to browser playable formats.                                | <ul style="list-style-type: none"> <li>All PebblePad users uploading media.</li> </ul>                | <ul style="list-style-type: none"> <li>Audio/video content</li> </ul>   | USA | <a href="mailto:privacy@brightcove.com">privacy@brightcove.com</a>             |
| Amazon Web Services, Inc | Handles all emails sent from PebblePad to ensure reliable delivery of notifications to users.                   | Transactional email service used for sending notification emails to users of PebblePad. | <ul style="list-style-type: none"> <li>Students</li> <li>Staff</li> <li>External Assessors</li> </ul> | <ul style="list-style-type: none"> <li>Name</li> <li>Email Address</li> <li>Course details/Module Name</li> <li>Username</li> </ul> | USA | Via <a href="mailto:datasecurity@pebblepad.com">datasecurity@pebblepad.com</a> |

## Sub-processors used to provide support and help desk functions to our customers

These sub-processors are used in the provision of our support and help desk service providing 2<sup>nd</sup> line support to customers. Direct users of these systems are limited to customer administrators, but they may hold the personal information of other users in the system as part of ticket details.

These systems do not have access to data held in PebblePad and are not directly involved in providing the service to end users.



| Name             | The scope and purpose  | Activities  | Data Subjects   | Categories of data  | Location | Contact  |
|------------------|--|---|---|---|----------|--|
| Freshworks, Inc. | Hold details of individuals requesting support. Held on record for audit purposes. | Help desk system used to report and track progress of support issues. | <ul style="list-style-type: none"> <li>• Students</li> <li>• Staff</li> <li>• External Assessors</li> </ul> | <ul style="list-style-type: none"> <li>• Name</li> <li>• Email Address</li> <li>• Course details/Module Name</li> <li>• Username</li> </ul> | EEA      | <a href="mailto:dpo@freshworks.com">dpo@freshworks.com</a> |

## Sub-processors used for communication with key business contacts

These sub-processors are utilised for recording details of key business to business interactions such as service reviews, contract renewals, product notifications and managing contacts and interacting with our marketing website.

These systems do not have access to data held in PebblePad or any function in provision of the service, and are not available to end users.

| Name          | The scope and purpose                                   | Activities  | Data Subjects   | Categories of data  | Location | Contact  |
|---------------|---|---|---|---|----------|--|
| Hubspot, Inc. | Holds details of key contacts involved in procurements. | Customer relationship management system which holds contact | <ul style="list-style-type: none"> <li>• Staff</li> </ul> | <ul style="list-style-type: none"> <li>• Name</li> <li>• Email Address</li> <li>• Work telephone number</li> <li>• Job title</li> <li>• Twitter name</li> </ul> | USA      | <a href="mailto:privacy@hubspot.com">privacy@hubspot.com</a> |

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|--|--|---------------------------------------|--|--|--|--|
|  |  | details for key<br>business contacts. |  |  |  |  |
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