

## Sub-processors as of 04/2026

All transfers of personal data outside of the EEA are performed on the basis of Art. 46 (2) (c) GDPR (application of the newest standard contractual clauses), with the exception of transfers to the US resulting from interactions with Microsoft, HubSpot, and Sendgrid: these companies and the relevant processing activities are covered by the EU-US Data Privacy Framework.

Name and address of Sub-processor	Scope, nature and purpose of Sub-processing	Categories of data subjects	Types of personal data	Duration of Sub-processing	Location of the Sub-processing
Microsoft (Azure/Application Insights)  Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA	Azure: cloud storage for Rencore Governance and associated scan data/app hosting  Application Insights: logging and processing of error data to assist in error resolution	The Customer's M365 users/those whose PII is referenced in the M365 tenant; Rencore Governance user	Azure: User profile data in Rencore Governance/M365; metadata generated by the use of M365  Application Insights: user IDs, exception details of external libraries and APIs, IP address, city, region	Duration of Rencore Governance subscription, with a 30-day period of subscription suspension and then a 30-day hold before permanent deletion; Application Insight logs are kept for 3 months after they are generated, regardless of end of subscription	Microsoft Germany West Central data center, as long as selected by Customer on connection of Rencore Governance with the M365 tenant – other options are Central US, Australia East, and Switzerland North. West Europe may be used with some legacy customers.
HubSpot (integration can be deactivated)  HubSpot, Inc., 2 Canal Park, Cambridge,	Operation of chat icon/support chat system within Rencore Governance; CRM system integration	The Customer's M365 users/those whose PII is referenced in the M365	User IDs, chat communications, chat metadata, subscription data in CRM system, name and email address, visited workspace ID	Duration of Rencore Governance subscription, longer where necessary for legal/accounting purposes or for the purposes of future troubleshooting	European Union

Massachusetts, 02141, USA		tenant, where relevant to the ticket; Rencore Governance user			
Chargebee  Chargebee Inc., 909 Rose Avenue, Suite 610, North Bethesda, Maryland, 20852, USA	Rencore Governance subscription management	Customer/any assigned payers of the Customer, e.g. assigned member of Customer's procurement department	Email address, username	Duration of Rencore Governance subscription, longer where necessary for legal/accounting purposes; should Rencore in the future decide to no longer work with Chargebee, Chargebee will retain data for 120 days before permanently deleting it.	Germany
Sendgrid (integration can be deactivated, with the exception of user invitation emails)  Twilio Inc., 101 Spear Street, First Floor, San Francisco, California, 94105, United States	Messaging service operating within Rencore Governance – this function can be carried out by an SMTP server or Microsoft 365 instead of Sendgrid in all cases except for inviting users to workspace, since those messages originate from Rencore's system	The Customer's M365 users; Rencore Governance users	Email address, internal message contents	Duration of Rencore Governance subscription. Sent messages may be stored for longer in end-user email clients	United States (storage in an Amazon Web Services data center)

<p>Userback (integration can be deactivated)</p> <p>Userback Pty Ltd, 9 Aspire Street, Rochedale, Brisbane, Queensland, 4123, Australia</p>	<p>Allows Customer to share feedback with Rencore</p>	<p>Rencore Governance users</p>	<p>Email address; name; text feedback, screenshots and video recordings (feedback may or may not contain PII - this is context dependent); session information (browser version, screen settings, OS, associated workspace, name of page loaded, date and time)</p>	<p>Until no longer serves purpose of collection – feedback is given under the understanding that Rencore can continue to use it post-subscription</p>	<p>United States (storage in an Amazon Web Services data center)</p>
<p>Pendo (integration can be deactivated)</p> <p>Pendo.io, Inc., 301 Hillsborough St. Suite 1900 Raleigh, NC 27603 USA</p>	<p>Collection of information on use of Rencore Governance to allow continual improvement of users' experience: Rencore creates dashboards, KPIs and metrics out of this information to help product development. Information may also be used in troubleshooting efforts.</p> <p>To create guided user journeys based on behavioral segmentation.</p>	<p>Rencore Governance users</p>	<p>Unique identifier of Rencore Governance users (not M365 users) - unique identifier can be used to derive name, company and company email address; Workspace/Environment information (ID, name); timeline for usage per Rencore Governance user; Pages visited; Features used; Events encountered (errors, exceptions, etc.); Poll responses; Product Guides watched; OS/browser/device information</p>	<p>Until no longer serves purpose of collection (product improvement, troubleshooting)</p>	<p>European Union</p>