

# Data processors

This page explains what third-party providers Rosa uses, when processing personal data. “Rosa” is Rosa ASBL, a non-profit organization established at Cantersteen 10, 1000 Brussels, with enterprise number 0745.832.604.

This document is part of the [privacy policy of Rosa](#) and of the [data processing agreement](#) between Rosa and its professional users.

To communicate with Rosa about data processors used to process personal data, please send an email to [gdpr@rosa.be](mailto:gdpr@rosa.be).

## Data processors

Rosa relies on services provided by other companies to perform its data processing activities. These companies may be considered as “data processors” under the applicable privacy laws.

Where Rosa engages data processors, Rosa ensures that they are subject to data protection obligations that provide at least the same level of protection for personal data as those in its privacy policy and data processing agreement (including, where appropriate, the Standard Contractual Clauses). As between you and Rosa, Rosa will remain responsible for any acts or omissions of its data processors as if they were Rosa’s acts or omissions.

### Data processors used for the Rosa applications

| Data processor                             | Description of processing | Data location | Types of data   |
|--|---------------------------|---------------|---|
| Amazon Web Services EMEA SARL (Luxembourg) | Cloud hosting             | EU            | Main hosting for all data processed in the Rosa applications  |
| Auth0, Inc (USA)                           | Identity management       | EU            | Auth0 receives and stores basic information in the course of authenticating users into the application. |
| MongoDB Limited (Ireland)                  | Database                  | EU            | Patient, Appointment and Health Professional data   |
| CM.com Belgium NV (Belgium)                | SMS reminders             | EU            | Phone number, appointment details.  |

|                              |  |   |  |
|------------------------------|--|---|--|
| Pendo, Inc (USA)             | Onboarding, product analytics                                    | EU  | Basic user details about usage of the application and metadata about interactions between Rosa staff and its customers.  |
| KEYMETRICS SAS               | Process Manager - Keeps our application running and capture logs | EU  | Technical data such as IP address, OS and browser version.   |
| New Relic                    | Infrastructure, Quality, and Real User Monitoring                | EU  | Technical data such as IP address, OS and browser version.<br>Basic user details about usage of the application.   |
| Google Ireland Ltd (Ireland) | Google analytics   | EU, USA   | Statistics about user configuration and website visits.  |
| Hotjar Ltd                   | Website and product analytics services                           | EU (user and usage data)<br>USA (exception-based logging) | Data collected through cookies: <ul style="list-style-type: none"> <li>• Anonymised User ID,</li> <li>• Attributes (such as speciality, language, location, days-active),</li> <li>• Country,</li> <li>• Device,</li> <li>• Operating System,</li> <li>• Browser,</li> <li>• Screen activity.</li> </ul> |
| Report-URI Ltd               | Collection of browser security errors                            | US  | <ul style="list-style-type: none"> <li>• IP address;</li> <li>• HTTP referrer;</li> <li>• document URI;</li> <li>• query string; and</li> <li>• URI fragments</li> </ul>   |

|                 |   |    |  |
|-----------------|---|----|--|
| Builder.io, Inc | Collection of data to enable our team to create, manage and publish content on our website without constantly relying on developers; A/B testing. | US | <ul style="list-style-type: none"> <li>• Use of the website;</li> <li>• Visitor ID;</li> <li>• ContentID;</li> <li>• VariantID;</li> <li>• Timestamp;</li> <li>• Browser data;</li> <li>• Purchase information.</li> </ul> |
|-----------------|---|----|--|

### Data processors used for the other activities of Rosa

| Data processor                                    | Description of processing  | Location of processing | Types of data  |
|---|--|------------------------|--|
| Google Ireland Ltd (Ireland)                      | Email  | EU                     | Communications with Rosa staff by email.   |
| Google Ireland Ltd (Ireland)                      | Workspace (Docs, Sheets, Slides, etc.)   | EU                     | Production data to manage support  |
| HubSpot Ireland Ltd (Ireland)                     | Communication with users and prospects for marketing, relationship management and support; collection of data for product and services improvement purposes. | Ireland, USA           | Personal details, communications with Rosa staff by email and metadata about those communications. |
| Partena Promeris Corporate Services GIE (Belgium) | Billing and accounting   | EU                     | Details of the customers and vendors, billing and payments information.                            |
| Tableau   | Reading and visualizing data from database   | EU                     | All Production database  |
| Atlassian   | Processing of data to import into Rosa main system   | EU                     | All customer data to be imported including patient and medical data.                               |
| Socket, Inc. (doing business as 'Wormhole')       | File sending between health professionals and  | USA                    | End-to-end encrypted customer data to be imported,   |

|  |  |              |   |
|--|--|--------------|---|
|  | Rosa   |              | including patient and medical data.   |
| Datawarehouse.io<br>A Bayard Bradford Company    | Automated format of Hubspot data to feed Tableau dashboards  | EU           | All Hubspot data  |
| Slack Technologies Limited, a Salesforce company | Internal messaging app   | EU           | Limited health professionals' data (such as name, language, gender: profession, specialty, NIHII, Phone number, sign-up Method).  |
| Figma, Inc.                                      | Processing of data to enable designing, prototyping and collaborating internally and with users in relation to Rosa's products and services. | USA          | Limited identification data of health professionals and research participants.  |
| Vanta, Inc.                                      | ISMS compliance platform   | USA          | Staff identification data and security-related information, such as location information, device information, log data like IP address, and any data reasonably necessary to verify that systems and devices are configured securely and compliant. |
| Mbrella SRL                                      | HR platform to manage flexible mobility  | EU (Ireland) | Staff identification data (such as name, surname, professional email) and information shared by mobility providers (social secretariat identification number) as required to manage mobility budget and create an account.                          |

## Changes to this document

This document enters into force as of 23 March 2023. We keep this document under regular review to ensure it is current and we may update it over time to reflect the changes in our services and data processing activities. If we do so, we will post the updated document on this webpage.

### Summary of changes

| Version number and effective date | Change(s) made   |
|-----------------------------------|--|
| V1.0 - 14 January 2022            |  |
| V1.1 - 1 February 2022            | Addition of Socket, Inc to the list of data processors.<br>Addition of New Relic to the list of data processors.   |
| V1.2 - 7 February 2022            | Addition of Google Ireland Ltd to the list of data processor for the Workspace suit  |
| V1.3 - 11 March 2022              | Location of the processing updated for Google (EU instead of USA)  |
| V1.4 - 1 April 2022               | Addition of Hotjar to the list of data processors  |
| V1.5 - 9 May 2022                 | Removal of Functional Software, Inc. doing business as "Sentry" as a data processor (as of 22 April 2022) and addition of Datawarehouse.io<br>A Bayard Bradford Company as a data processor (as of 9 May 2022).  |
| V1.6 - 20 June 2022               | To better understand the performance of our onboarding, we process some metadata about interactions between our staff and our customers. To reflect this, we have made some changes to the description of the processing activities via Hubspot and the types of data processed via Hubspot and Pendo. We would also like to use Hotjar to send surveys for analytical and quality improvements purposes. We have therefore slightly edited the description of the processing as well as the data processed. Finally, we have clarified that Partena Promeris might also process the personal data of our vendors (and their staff) for billing and accounting purposes. |

|                        |   |
|------------------------|---|
| V1.7 - 1 August 2022   | <p>We are using Slack to communicate internally about our product and services, including new users. We may use Slack to share limited personal data about health professionals.</p> <p>To build and improve our products and services, we are using Figma to design, prototype and collaborate internally or with users and to store input shared by user research participants. Figma may therefore be used to store limited personal data about health professionals and/or other research participants.</p> |
| V1.8 - 31 January 2023 | <p>We are using Vanta, a security and compliance platform to help us stay compliant from a security perspective.</p>  |
| V1.9 - 9 February 2023 | <p>As from 13 Feb 2023, we will be using Report-URI to help us detect some of the most dangerous attacks online. As from 13 February 2023, we will be using Mbrella to help employees manage their own mobility budget.</p>   |
| V1.10 - 23 March 2023  | <p>As of 21 March 2023, we have decided not to use Facebook Pixel anymore. As such, we have removed Meta/Facebook from our list of data processors.</p>   |