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 <u>privacy policy of Rosa</u> and of the <u>data processing agreement</u> between Rosa and its professional users.

To communicate with Rosa about data processors used to process personal data, please send an email to <u>gdpr@rosa.be</u>.

🛠 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.
Functional Software, Inc. doing business as "Sentry" (USA)	Quality management	USA	Email address and technical data such as IP address, OS and browser version.
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. Basic user details about usage of the application.
Google Ireland Ltd (Ireland)	Google analytics	EU, USA	Statistics about user configuration and website visits.
Facebook Pixel	Facebook ads	USA	Statistics about user behavior & website visits

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	Ireland, USA	Personal details, communications with Rosa staff by email.
Partena Promeris Corporate Services GIE (Belgium)	Billing and accounting	EU	Details of the customers, 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 Rosa	USA	End-to-end encrypted customer data to be imported, including patient and medical data.

Changes to this document

This document is current as of 7 February 2022. 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 in the list of data processors. Addition of New Relic in the list of data processors.
V1.2 - 7 February 2022	Addition of Google Ireland Itd in 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)