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.

🛠️ 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. 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
Hotjar Ltd	Website and product analytics services	EU (user and usage data) USA (exception-based logging)	- Anonymised User ID, - Attributes (such as speciality, language, location, days-active), - Country, - Device, - Operating System, - Browser, - Screen activity.

Report-URI Ltd	Collection of browser security errors	US	- IP address; - HTTP referrer; - document URI; - query string; and - URI fragments
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	- Use of the website; - Visitor ID; - ContentID; - VariantID; - Timestamp; - Browser data; - Purchase information.

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	EU	All Production

	visualizing data from database		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.
Datawarehouse.io 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	EU (Ireland)	Staff identification data (such as name,

	mobility		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 9 February 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. 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 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	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. 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.
V1.8 - 31 January 2023	We are using Vanta, a security and compliance platform to help us stay compliant from a security perspective.
V1.9 - 9 February 2023	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.