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# **CIBT Inc Sub-processors**

CIBT Inc. uses sub-processors to provide its products and to perform the relevant business operations. Subprocessors go through a vendor assessment and are subject to proportionate confidentiality and security obligations.

Below is a list of vendors that may process data pertaining to, and used by, CIBT Inc. customers ("**customer data**") in connection with products provided and hosted on cloud by CIBT Inc. ("Cloud Products").

### 1. Sub-processors for or using Cloud Products

| Sub-processor       | Purpose and Products   | Data Location                                  |
|---------------------|--|--|
| AWS                 | Hosting and providing virtual certain CIBT Inc.<br>products including ImmigoNext and API connections                           | Frankfurt, Germany and Ashburn, Virginia (USA) |
|                     |  | Ireland  |
| Microsoft           | Email, Sharepoint and general office products including SharePoint   | EU and USA                                     |
| Auth0               | Enabling all the sign-in and sign-up experiences for the Immigo, Entriva and Atlas Platforms                                   | EU   |
| UIPath              | Immigo, Entriva and Atlas (Inon). OCR and form filling technologies used to automate the completion of various documents.      | Frankfurt, Germany                             |
| NovaCore Al Limited | Image validation for passport photos.  | Frankfurt, Germany                             |
| The COZM            | A1 application processing and form fill. <i>Limited to A1 applications.</i>  | London UK                                      |
| AORA                | Platform for review of documents and<br>sponsorship information to expedite and<br>automate Skilled Worker applications in UK. | London UK                                      |

#### 2. Sub-processors for Support

| Sub-processor | Purpose                             | Data Location |
|---------------|-------------------------------------|---------------|
| Freshworks    | Client case management and tracking | EU and USA    |
| Salesforce    | Customer contact information.       | EU and USA    |

## 3. Professional Services

Professional Services may be delivered through affiliates or contractors, depending on customer needs. We



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currently have processing offices in over 60 countries, and we use our affiliates only in countries where we are not otherwise able to provide service or are prohibited from doing so by the government in that location. We disclose the use of our affiliates at the time of service for your request.

### 4. CIBT Inc. Affiliates

We may share personal data contained in customer data with our affiliates as necessary to provide support services or perform usual business activities. The CIBT affiliates are in India and Serbia.

### 5. Customer data storage location

For global clients of Immigo, Entriva and Atlas, we store customer data in our Frankfurt data center. For non-EU/UK/Swiss clients, customer data can be hosted across different regions, depending on:

- the region of your organization
- the services you have active in your organization and tenant, and their availability in your region

Further information is available when you sign up for our services.

CIBT Inc. uses COLO facilities in Frankfurt, London, Australia, Switzerland and the United States.

### 6. Updates

This document may be updated from time to time.

Changes to sub-processors having access to personal data will be made available to customers either via (i) notice at the email address of the account manager, or (ii) notification service available for subscription to customers.