

# SurveyMonkey Subprocessors

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Please note that not all subprocessors are used in the provision of all of our Services. Our subprocessor list is segmented into specific SurveyMonkey services.

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## Subprocessors used to provide SurveyMonkey

Sub-processor	Purpose	Personal Data	Transfer Destination	Mechanism of transfer	Supplementary Measures: Contractual, Organizational, and Technical	Risk
Amazon Web Services ("AWS")	Data storage services for storing assets and database hosting; Content distribution network ("CDN") services	<p><b>Personal data:</b> Names of Individuals (First and/or Last Names)</p> <p>Any unique identifier that can be used to tie to a particular person in the real world</p> <p>Vehicle registration plate number</p> <p>Data of Birth</p> <p>Email Address</p> <p>Phone Number</p> <p>Physical Address (i.e. 123 Fake St)</p> <p>ZIP/Postal Code</p> <p>Apartment Numbers (i.e. Address Line 2)</p> <p>IP address</p>	<p>United States</p> <p>Canada</p> <p>Ireland</p>	<p>USA: SCCs and <a href="#">DPF</a></p> <p>Canada: SCCs and adequacy</p> <p>Ireland: SCCs</p>	<p>Please see AWS's <a href="#">commitments to data control, data privacy, and security</a>.</p> <p>Specifically, SurveyMonkey uses the latest generation of EC2 which automatically gain the protection of the AWS Nitro System. Using purpose-built hardware, firmware, and software, AWS Nitro provides unique and industry-leading security and isolation by offloading the virtualization of storage, security, and networking resources to dedicated hardware and software. This enhances security by minimizing the attack surface and prohibiting administrative access</p>	<p>USA: Low</p> <p>Canada: Low</p> <p>Ireland: Non-material</p>

Sub-processor	Purpose	Personal Data	Transfer Destination	Mechanism of transfer	Supplementary Measures: Contractual, Organizational, and Technical	Risk
		<p>IMSI/IMEI numbers</p> <p>MAC address</p> <p>Insurance details</p> <p>Family members and Dependents</p> <p>Sensitive Personal Data can be included in survey response or form data and so AWS may store any of the following:</p> <p>Government/National ID (e.g. SSN, SIN), Driver's License number, Passport number</p> <p>Username and password, Authentication credentials</p> <p>Financial and Payment information (account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account)</p>			<p>while improving performance.</p> <p>All data in transit between our secure datacenter facilities, availability zones, and regions is encrypted automatically at the hardware level. SurveyMonkey also utilizes AWS Key Management Services to control and manage our own keys within FIPS-140-2 certified hardware security modules. Regardless of whether data is encrypted or unencrypted, we will always work vigilantly to protect data from any unauthorized access.</p> <p>Our security team has carried out a comprehensive review of all AWS cloud</p>	

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		<p>Geolocation</p> <p>Race/ethnicity</p> <p>Religious/Political/Trade Union Affiliation</p> <p>Sex life or Sexual Orientation</p> <p>Health data (incl. prescription medications, medical procedures and tests, diagnoses, medical practitioners and area of practice, health card numbers etc.)</p> <p>Biometrics (e.g. fingerprints, voice recordings, photos)</p> <p>Genetic data</p> <p>Salary/Income (or ranges of same)</p> <p>Customer survey responses (responses received by a customer to the survey they create within SurveyMonkey accounts)</p>			<p>infrastructure services and changes are kept under continual review.</p> <p>SurveyMonkey encrypts all data at rest in our data centres using AES 256 based encryption. Additionally, SurveyMonkey encrypts all data in motion using (i) RSA with 2048 bit key length based certificates generated via a public Certificate Authority, for communications with entities outside SurveyMonkey's data centres, and (ii) RSA 256 certificates generated via Internal Certificate Authority, for all the data within the data centre.</p> <p>These encryption efforts prevent the acquisition of data in an intelligible form This also deters wiretapping between</p>	

Sub-processor	Purpose	Personal Data	Transfer Destination	Mechanism of transfer	Supplementary Measures: Contractual, Organizational, and Technical	Risk
		<p>Credit score/record</p> <p>Communications - the contents of a consumer's private communications, unless the company is the intended recipient of the communication</p> <p>Criminal record</p> <p><b>Quasi identifiers:</b> This could include data which is not personal unless linked to other data e.g. web identifiers, device information, browser data and other metadata which may in some cases be linkable to other categories of data listed above.</p>			the two end-points while such data is in transmission or in storage.	
Argos	Assist with translation services ordered as part of the professional services SurveyMonkey offers. This subprocessor is only utilized when a SurveyMonkey	<p>Names of Individuals (First and/or Last Names) , Email, Phone Number, Content of communications sent during provision of professional services</p> <p>Respondent ID, Respondent email address, First and last name, phone number, Browser</p>	Poland	SCCs	Please see Argos' security information and ISO 27001 certificate <a href="#">here</a> .	Non-material

Sub-processor	Purpose	Personal Data	Transfer Destination	Mechanism of transfer	Supplementary Measures: Contractual, Organizational, and Technical	Risk
	customer has purchased additional professional services, specifically to translate survey question, answer, and response text.	information, Survey Responses including open text response data				
Inginit	Professional Services project coordinators (contractors). This subprocessor is only utilized when a SurveyMonkey customer has purchased additional professional services.	Names of Individuals (First and/or Last Names) , Email, Phone Number, Content of communications sent during provision of professional services  Respondent ID, Respondent email address, First and last name, phone number, Browser information, Survey Responses including open text response data	India	SCCs	Please see Inginit's Security page, in addition to the information below.  SurveyMonkey employs remote desktop control over contracted professional services agents. All personnel handling personal data are subject to confidentiality obligations. Anti-malware and malicious software detection controls are in place to ensure no unauthorised access to data can take place, and	Low

Sub-processor	Purpose	Personal Data	Transfer Destination	Mechanism of transfer	Supplementary Measures: Contractual, Organizational, and Technical	Risk
					<p>all data are encrypted when transferred over public networks.</p> <p>There are also specific data handling procedures in place which ensure strict 'need to know' access controls are in place, as well as policies which ensure the deletion of the data after use. Further access controls also require specific identification of the terminal user on the relevant systems, as well as requiring identification codes and password complexity standards for anyone who needs to access the data. VPNs, two-factor authentication and role-based access are also baked into the main access control procedures.</p>	

Sub-processor	Purpose	Personal Data	Transfer Destination	Mechanism of transfer	Supplementary Measures: Contractual, Organizational, and Technical	Risk
					<p>During transmission, data are subject to various strict transmission controls including procedures preventing the data from being read, copied, altered or deleted while in transit. Encryption technologies and the use of firewalls are in place to protect gateways and firewalls through which the data travels, and VPN connections safeguard the data connection to internal networks. Infrastructure is constantly monitored (e.g. through ICMP-Ping at network level), and the end-to-end security monitoring takes place to ensure the completeness and correctness of all transfers.</p>	



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					<p>All encryption solutions are deployed with no less than a 128-bit key for symmetric encryption and a 1024 (or larger) bit key length for asymmetric encryption.</p> <p>Input control ensures that it is possible to check and establish whether and by whom Personal Data has been input into data processing systems or removed.</p> <p>Such controls include authentication and logging. Vulnerability management is in place to detect and immediately remedy any system vulnerabilities.</p> <p>Data destruction procedures also ensure that data subject to the</p>	

Sub-processor	Purpose	Personal Data	Transfer Destination	Mechanism of transfer	Supplementary Measures: Contractual, Organizational, and Technical	Risk
					transfer are secured and not held for any longer than necessary to achieve the purposes of providing professional services ordered by the customer.	
Microsoft (Sharepoint)	Internal document repository	Customer Data as requested to provide Professional Services (eg: survey design and response analysis)	USA	SCCs and DPF	Please see <a href="#">Microsoft Cloud Transfer Whitepaper</a> and <a href="#">security documentation</a> .	Low
SurveyMonkey Inc.	Customer and product support services; product development, infrastructure, and technology services.	Respondent: Contact Information, Usage Information, Device Information, Cookie and other tracking information	USA	SCCs and DPF	Please see description above and our <a href="#">Security Statement</a> and <a href="#">GDPR Whitepaper</a> .	Low
SurveyMonkey Australia Pty Limited	Customer and product support services; product development, infrastructure, and technology services.	Respondent: Contact Information, Usage Information, Device Information, Cookie and other tracking information	Australia	SCCs	Please see description above and our <a href="#">Security Statement</a> and <a href="#">GDPR Whitepaper</a> .	Low

Sub-processor	Purpose	Personal Data	Transfer Destination	Mechanism of transfer	Supplementary Measures: Contractual, Organizational, and Technical	Risk
SurveyMonkey Canada Inc.	Customer and product support services; product development, infrastructure, and technology services.	Respondent: Contact Information, Usage Information, Device Information, Cookie and other tracking information	Canada	Adequacy and SCCs	Please see description above and our <a href="#">Security Statement</a> and <a href="#">GDPR Whitepaper</a> .	Low
SurveyMonkey UK Ltd.	Customer and product support services; product development, infrastructure, and technology services.	Respondent: Contact Information, Usage Information, Device Information, Cookie and other tracking information	UK	Adequacy and SCCs	Please see description above and our <a href="#">Security Statement</a> and <a href="#">GDPR Whitepaper</a> .	Low
Salesforce (including Sales Cloud, Service Cloud, Community Cloud, Chatter, Salesforce Platform, Customer Data Platform, Marketing	Customer Support	Names of Individuals (First and/or Last Names) , Email, Phone Number, Content of communications sent during provision of Customer Support	USA	SCCs and DPF	Please see Salesforce's <a href="#">Security Whitepaper</a> , <a href="#">security certifications</a> , <a href="#">DPA FAQ</a> , and <a href="#">Trust and Compliance documentation</a> .	Low

Sub-processor	Purpose	Personal Data	Transfer Destination	Mechanism of transfer	Supplementary Measures: Contractual, Organizational, and Technical	Risk
Cloud, Mulesoft, and Tableau CRM)						
Snowflake	Storage of usage data for analytics and product development.	IP Address, Email address (first and last name), Quasi identifiers Respondent ID	USA	SCCs and DPF	<p>SurveyMonkey data is stored encrypted at rest on AWS S3. Snowflake uses strong AES 256 bit encryption with a hierarchical key model. Snowflake implements a comprehensive monitoring and logging system.</p> <p>Snowflake is ISO 27001 and SOC 2 certified and these certifications have been reviewed by the SurveyMonkey security team in full as part of our risk review.</p> <p>Employees are provided with both Security and Privacy Awareness Training overview which</p>	Low

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					<p>they are required to complete at hire and then on an annual basis thereafter. In addition, as needed, other quarterly training on featured security and privacy related topics and role specific training for personnel whose role responsibilities require additional security procedures are provided.</p> <p>Access to any production environment is based on least privileged access rules and role based access controls and deprovisioning is similarly managed and monitored.</p> <p>See Snowflake's documentation for more information: <a href="#">Data Security and Trust Center</a>.</p>	

Sub-processor	Purpose	Personal Data	Transfer Destination	Mechanism of transfer	Supplementary Measures: Contractual, Organizational, and Technical	Risk
Sparkpost (MessageBird)	Email delivery service.	Email address, meta data (open clicks, date stamps)	USA	SCCs and DPF	<p>See: <a href="#">Security Program - SparkPost</a></p> <p>SparkPost maintains Customer Data in an encrypted format at rest and in transit using SSL, HTTPS, and opportunistic TLS as applicable.</p> <p>Customer Data is encrypted when in transit between Customer and SparkPost Services using HTTPS. Customer Data is encrypted when in transit between SparkPost and Recipient using opportunistic TLS.</p> <p>SparkPost conducts various third-party audits to attest to various frameworks including SOC 2 Type II and regular application vulnerability and</p>	Low

Sub-processor	Purpose	Personal Data	Transfer Destination	Mechanism of transfer	Supplementary Measures: Contractual, Organizational, and Technical	Risk
					<p>penetration testing.</p> <p>SparkPost does not store the message body of an Email after it has either been delivered to the Recipient or has bounced or otherwise been rejected by the mailbox provider, which typically occurs within seconds. In the event of a rejection or bounce, SparkPost will retain the message body for a limited period of time to allow for the Email transmission to be retried. If the transmission is still unsuccessful, the message body is permanently deleted.</p> <p>SparkPost only stores Recipient Personal Data in raw form for a limited amount of time after the transmission of an Email</p>	

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					to a Recipient. After the initial retention period, the Personal Data is pseudonymized through a one-way hash and is only stored in its pseudonymized form. For more information about this process please see the Sparkpost Data FAQs available <a href="#">here</a> .	
Splunk	Software for searching, monitoring, and analyzing machine-generated data.	Respondent ID, Respondent email address, First and last name, phone number, Browser information, Open text response data	USA	SCCs and DPF	Please see Splunk's <a href="#">security documentation</a> and <a href="#">compliance certificates</a> .	Low
Twilio	SMS delivery.	Respondent phone number, Content of SMS communications	USA	SCCs and DPF	Please see Twilio's <a href="#">security certification</a> , <a href="#">security statement</a> , and <a href="#">security overview</a> .	Low
Upwork	Professional Services project coordinators (contractors). This subprocessor is only	Names of Individuals (First and/or Last Names) , Email, Phone Number, Content of communications sent during provision of professional services	USA Australia Italy	USA: SCCs and DPF Australia: SCCs	Please see Upwork's <a href="#">security page</a> , in addition to the information below.	USA: low Australia: low



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	utilized when a SurveyMonkey customer has purchased additional professional services	Respondent ID, Respondent email address, First and last name, phone number, Browser information, Survey Responses including open text response data		Italy: SCCs	<p>SurveyMonkey employs remote desktop control over contracted professional services agents. All personnel handling personal data are subject to confidentiality obligations. Anti-malware and malicious software detection controls are in place to ensure no unauthorised access to data can take place, and all data are encrypted when transferred over public networks.</p> <p>There are also specific data handling procedures in place which ensure strict 'need to know' access controls are in place, as well as policies which ensure the deletion of the data after use. Further access controls</p>	Italy: non-material

Sub-processor	Purpose	Personal Data	Transfer Destination	Mechanism of transfer	Supplementary Measures: Contractual, Organizational, and Technical	Risk
					<p>also require specific identification of the terminal user on the relevant systems, as well as requiring identification codes and password complexity standards for anyone who needs to access the data. VPNs, two-factor authentication and role-based access are also baked into the main access control procedures.</p> <p>During transmission, data are subject to various strict transmission controls including procedures preventing the data from being read, copied, altered or deleted while in transit. Encryption technologies and the use of firewalls are in place to protect gateways and firewalls</p>	

Sub-processor	Purpose	Personal Data	Transfer Destination	Mechanism of transfer	Supplementary Measures: Contractual, Organizational, and Technical	Risk
					<p>through which the data travels, and VPN connections safeguard the data connection to internal networks. Infrastructure is constantly monitored (e.g. through ICMP-Ping at network level), and the end-to-end security monitoring takes place to ensure the completeness and correctness of all transfers.</p> <p>All encryption solutions are deployed with no less than a 128-bit key for symmetric encryption and a 1024 (or larger) bit key length for asymmetric encryption.</p> <p>Input control ensures that it is possible to check and establish whether and by whom Personal Data has been</p>	

Sub-processor	Purpose	Personal Data	Transfer Destination	Mechanism of transfer	Supplementary Measures: Contractual, Organizational, and Technical	Risk
					<p>input into data processing systems or removed.</p> <p>Such controls include authentication and logging. Vulnerability management is in place to detect and immediately remedy any system vulnerabilities.</p> <p>Data destruction procedures also ensure that data subject to the transfer are secured and not held for any longer than necessary to achieve the purposes of professional services.</p>	
Upwork	Customer Support team task augmentation (contractors).	Customer name (First and/or Last Names) , Email, Phone Number, Content of communications sent during provision of Customer Support	Philippines Costa Rica	SCCs	See above.	Philippines: low Costa Rica: low
Xoriant, InfoSol,	Data & Analytics team task	Data as listed for Snowflake	India	SCCs	All the security controls available and listed	Low



Subprocessor	Purpose	Personal Data	Transfer Destination	Mechanism of transfer	Supplementary Measures: Contractual, Organizational, and Technical	Risk
Australia Pty Limited, SurveyMonkey Canada Inc., SurveyMonkey UK Ltd.)						
Salesforce	See above	See above	See above	See above	See above	See above
Snowflake	See above	See above	See above	See above	See above	See above
Sparkpost	See above	See above	See above	See above	See above	See above
Splunk	See above	See above	See above	See above	See above	See above
Twilio	See above	See above	See above	See above	See above	See above
Upwork	Professional Services	See above	See above	See above	See above	See above
Upwork	Customer Support	See above	See above	See above	See above	See above
Xoriant, InfoSol, Tredence, Impetus, Valuelabs	See above	See above	See above	See above	See above	See above

## Subprocessors used to provide GetFeedback Digital

Subprocessor	Purpose	Personal Data	Transfer Destination	Mechanism of transfer	Supplementary Measures: Contractual, Organizational, and Technical	Risk
AWS	See above	See above	See above	See above	See above	See above
Google	Open-text response translation feature requested by a subset of GetFeedback Digital customers.	Survey Response data. This may or may not include personal data, depending on the types of questions in the survey and how the respondent chooses to answer the questions.	USA	SCCs and DPF	<a href="https://cloud.google.com/security/">https://cloud.google.com/security/</a>	Low
SurveyMonkey Affiliates (SurveyMonkey Inc., SurveyMonkey Australia Pty Limited, SurveyMonkey Canada Inc., SurveyMonkey UK Ltd.)	See above	See above	See above	See above	See above	See above

Subprocessor	Purpose	Personal Data	Transfer Destination	Mechanism of transfer	Supplementary Measures: Contractual, Organizational, and Technical	Risk
ScaleGrid	Database hosting	<p>Names of Individuals (First and/or Last Names)</p> <p>Any unique identifier that can be used to tie to a particular person in the real world</p> <p>Vehicle registration plate number</p> <p>Data of Birth</p> <p>Email Address</p> <p>Phone Number</p> <p>Physical Address (i.e. 123 Fake St)</p> <p>ZIP/Postal Code</p>	Ireland	SCCs	<a href="https://mongodb.scalegrid.io/hubs/Whitepaper-ScaleGrid-Infrastructure-Security.pdf">https://mongodb.scalegrid.io/hubs/Whitepaper-ScaleGrid-Infrastructure-Security.pdf</a>	Non-material



Subprocessor	Purpose	Personal Data	Transfer Destination	Mechanism of transfer	Supplementary Measures: Contractual, Organizational, and Technical	Risk
		<p>Apartment Numbers (i.e. Address Line 2)</p> <p>IP address</p> <p>IMSI/IMEI numbers</p> <p>MAC address</p> <p>Insurance details</p> <p>Family members and Dependents</p> <p>Sensitive Personal Data can be included in survey response or form data and so AWS may store any of the following:</p>				

Subprocessor	Purpose	Personal Data	Transfer Destination	Mechanism of transfer	Supplementary Measures: Contractual, Organizational, and Technical	Risk
		<p>Government/National ID (e.g. SSN, SIN),  Driver's License number,  Passport number</p> <p>Username and password,  Authentication credentials</p> <p>Financial and Payment information  (account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account)</p>				

Subprocessor	Purpose	Personal Data	Transfer Destination	Mechanism of transfer	Supplementary Measures: Contractual, Organizational, and Technical	Risk
		Geolocation Race/ethnicity Religious/Political/Trade Union Affiliation Sex life or Sexual Orientation Health data (incl. prescription medications, medical procedures and test, diagnoses, medical practitioners and area of practice, health card numbers etc.) Biometrics (e.g. fingerprints, voice				

Subprocessor	Purpose	Personal Data	Transfer Destination	Mechanism of transfer	Supplementary Measures: Contractual, Organizational, and Technical	Risk
		<p>recordings, photos)</p> <p>Genetic data</p> <p>Salary / Income (or ranges of same)</p> <p>Customer survey responses (responses received by a customer to the survey they create within SurveyMonkey accounts)</p> <p>Credit score / record</p> <p>Communications - the contents of a consumer's private communications, unless the company is the</p>				

Subprocessor	Purpose	Personal Data	Transfer Destination	Mechanism of transfer	Supplementary Measures: Contractual, Organizational, and Technical	Risk
		<p>intended recipient of the communication</p> <p>Criminal record</p> <p><b>Quasi identifiers:</b> This could include data which is not personal unless linked to other data e.g. web identifiers, device information, browser data and other meta data which may in some cases be linkable to other categories of data listed above.</p>				
Upwork	Engineering Team augmentation (contractors)	See above	Brazil	SCCs	See above	Low

## Subprocessors used to provide GetFeedback Direct

Subprocessor	Purpose	Personal Data	Transfer Destination	Mechanism of transfer	Supplementary Measures: Contractual, Organizational, and Technical	Risk
AWS	See above	See above	See above	See above	See above	See above
Functional Software Inc. (Sentry.io)	Applications error capturing (site health monitor).	<p>Direct identifying information (e.g. name, email address, telephone)</p> <p>Indirect identifying information (e.g. job title, gender, date of birth)</p> <p>Device identification data and traffic data (e.g. IP addresses, MAC addresses, web logs, browser agents)</p> <p>Any personal data supplied by end users of the Service.</p>	USA	SCCs and DPF	See Sentry's <a href="#">security page</a> for more details.	Low
Google	Hosts survey assets and respondent assets, NLP for respondent data,	Survey Response data. This may or may not include personal data,	USA	SCCs and DPF	<a href="https://cloud.google.com/security/">https://cloud.google.com/security/</a>	Low

Subprocessor	Purpose	Personal Data	Transfer Destination	Mechanism of transfer	Supplementary Measures: Contractual, Organizational, and Technical	Risk
	respondent data hosted on Google platform for searching/indexing dashboards.	depending on the types of questions in the survey and how the respondent chooses to answer the questions.				
Heroku (Salesforce)  (if you utilize GetFeedback Direct's EU Data Center, Heroku is not a subprocessor)	Application host and data store that runs on AWS.	See 'Amazon/AWS' above	USA	SCCs and DPF	Please see Heroku's <a href="#">security certifications</a> and <a href="#">Trust and Compliance documentation</a> .	Low
IPdata	Geolocation lookup for Respondents	IP address	USA	SCCs	Please see IP data's <a href="#">Privacy Policy</a> for more information.	Low
SurveyMonkey Affiliates (SurveyMonkey Inc., SurveyMonkey Australia Pty Limited,	See above	See above	See above	See above	See above	See above









Subprocessor	Purpose	Personal Data	Transfer Destination	Mechanism of transfer	Supplementary Measures: Contractual, Organizational, and Technical	Risk
Limited, SurveyMonkey Canada Inc., SurveyMonkey UK Ltd.)						
Salesforce	See above	See above	See above	See above	See above	See above
Sparkpost (MessageBird)	See above	See above	See above	See above	See above	See above
Upwork	Customer Support	See above	See above	See above	See above	See above