

# Stannp Subprocessor Directory

## Introduction

Stannp Ltd ("Stannp," "we," "us," or "our") is committed to protecting your privacy and maintaining the highest standards of data security. This Subprocessor Directory lists all third-party service providers (subprocessors) that may process personal data on behalf of Stannp in connection with providing our Platform and Services.

As a data controller and processor, we carefully select, assess, and continuously monitor all subprocessors to ensure they meet our stringent security, privacy, and compliance requirements.

## What is a Subprocessor?

A subprocessor is any third party that processes personal data on Stannp's behalf to support the delivery of our Services. This includes hosting providers, analytics services, communication platforms, and other service providers that may have access to personal data.

## Current Subprocessors

### Cloud Infrastructure

We rely on cloud infrastructure providers to host our platform, store data securely, and ensure reliable service delivery to our customers.

| Subprocessor           | Data Processed                      | Processing Purpose   | Data Location | Security Certifications          | Privacy Information                         |
|------------------------|-------------------------------------|--|---------------|----------------------------------|---|
| <b>Microsoft Azure</b> | All customer data and personal data | Server hosting, database storage, cloud-based file storage | EEA           | ISO 27001, SOC 2, GDPR compliant | <a href="#">Microsoft Privacy Statement</a> |

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## Customer Experience & Communications

These services help us manage customer relationships, deliver communications, and understand how our platform is being used.

| Subprocessor     | Data Processed                                      | Processing Purpose  | Data Location                | Security Certifications                  | Privacy Information                    |
|------------------|---|---|------------------------------|--|--|
| HubSpot          | Customer contact details, communication preferences | Customer relationship management and marketing email delivery | EEA (Ireland)                | ISO 27001, SOC 2 Type II, GDPR compliant | <a href="#">HubSpot Privacy Policy</a> |
| Plivo            | Phone numbers, SMS content                          | SMS delivery service  | US (Adequacy Decision)       | ISO 27001, SOC 2 Type II                 | <a href="#">Plivo Privacy Policy</a>   |
| SendGrid         | Email addresses, transactional email content        | Transactional notification email delivery                     | US (Adequacy Decision)       | ISO 27001, SOC 2 Type II                 | <a href="#">Twilio Privacy Notice</a>  |
| Google Analytics | Website usage data, anonymized user behavior        | Website and platform analytics                                | EEA > US (Adequacy Decision) | ISO 27001, SOC 2                         | <a href="#">Google Privacy Policy</a>  |
| Google Ads       | Email addresses and names                           | Targeted advertising and audience matching                    | EEA > US (Adequacy Decision) | ISO 27001, SOC 2                         | <a href="#">Google Privacy Policy</a>  |

## Fulfilment & Logistics

Our direct mail services require physical delivery partners and data validation services to ensure successful campaign delivery.

| Subprocessor     | Data Processed                       | Processing Purpose   | Data Location | Security Certifications              | Privacy Information                       |
|------------------|--------------------------------------|--|---------------|--------------------------------------|---|
| Royal Mail (PAF) | Recipient addresses, mailing data    | Postal Address File — address validation and standardisation | UK            | Government postal security standards | <a href="#">Royal Mail Privacy Notice</a> |
| Royal Mail       | Recipient addresses, mailing data    | Delivery of postcards and letters                            | UK            | Government postal security standards | <a href="#">Royal Mail Privacy Notice</a> |
| Whistl           | Recipient addresses, delivery data   | Downstream courier services for physical items               | UK            | ISO 9001, secure logistics standards | <a href="#">Whistl Privacy Policy</a>     |
| Sagacity         | Customer mailing lists, address data | Data cleaning and validation services                        | UK            | ISO 27001, data processing standards | <a href="#">Sagacity Privacy Policy</a>   |

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## Business Operations

Essential business management tools for accounting, invoicing, and financial reporting.

| Subprocessor          | Data Processed                             | Processing Purpose                         | Data Location | Security Certifications    | Privacy Information                   |
|-----------------------|--|--|---------------|----------------------------|---------------------------------------|
| <b>Sage</b>           | Customer billing information, invoice data | Accounts software and financial management | UK            | ISO 27001, PCI DSS Level 1 | <a href="#">Sage Privacy Notice</a>   |
| <b>Opayo (Elavon)</b> | Payment card data, billing information     | Payment processing                         | UK            | PCI DSS Level 1, ISO 27001 | <a href="#">Elavon Privacy Policy</a> |

## Data Protection Safeguards

All subprocessors are required to implement appropriate technical and organisational security measures, process data only on documented instructions from Stannp, maintain confidentiality of all personal data, assist with data subject rights requests when required, notify Stannp of any data breaches without undue delay, and return or delete data upon termination of services.

## International Data Transfers

Where subprocessors are located outside the UK/EEA, we ensure adequate protection through adequacy decisions (US adequacy decision) or appropriate safeguards (Standard Contractual Clauses). All transfers comply with UK GDPR Article 44-49 requirements and additional security measures are implemented where necessary.

## Changes to Subprocessors

We will provide advance notification when we engage new subprocessors, replace existing vendors, or make material changes to subprocessor arrangements that affect data processing scope, location, or security. We do not provide advance notice for removing subprocessors, minor administrative changes, or service improvements that enhance security.

Upon receiving notification of changes, you have the right to object to new subprocessors within 30 days by contacting [privacy@stannp.com](mailto:privacy@stannp.com), request information about how changes may affect your data, and terminate relevant services if we cannot accommodate your objections.

## Contact Information

For questions about our subprocessors or to exercise your rights please email [privacy@stannp.com](mailto:privacy@stannp.com) or write to us at Data Protection Query, Stannp Ltd, Unit 12 Taw Trade Park, Braunton Road, Barnstaple, Devon, England, EX31 1JZ.

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