

## intelliflo sub-processors (all regions)

Last updated: May 2023

intelliflo engages vendors in the provisioning of services and to support the operationalisation of our software.

In the context of privacy and data protection law, vendors providing such services to us are defined as 'sub-processors' and must act in accordance with our instructions.

Below is a list of these vendors and the scope of their services.

| Vendor name                           | Vendor address   | Key activities   | Do they store data? | Can they access data?* | Vendor<br>location |
|---------------------------------------|--|--|---------------------|------------------------|--------------------|
| Amazon Web<br>Services, Inc.<br>(AWS) | 1 Principal Place, London,<br>Worship Street, EC2A 2FA                                     | Computing, storage, and other application services   | Yes                 | Yes                    | UK, EEA            |
| Certua                                | 1st Floor Healthaid House, Marlborough Hill,<br>Harrow, Middlesex, United Kingdom, HA1 1UD | Certua are a service provider who integrate with banks and financial institutions using open banking to provide intelliflo with account integration services. Customers will only have Certua as a sub processor when using the open banking service within PFP. | Yes                 | Yes                    | UK                 |
| Datavail                              | 11800 Ridge Pkwy Ste 125, Broomfield,<br>Colorado, 80021, United States                    | Infrastructure, support  | No                  | Yes                    | US, India          |
| DocuSign                              | The Pavilions, Bridgwater Road, Bristol,<br>England, BS13 8FD                              | Electronic signature capabilities within personal finance portal   | Yes                 | Yes                    | EEA                |
| eValue                                | Benyon House Newbury Business Park,<br>London Road, Newbury, Berkshire, RG14 2PZ           | Financial planning solution that includes various planning tool-based capabilities. When customers use this integration, the customers' data will be sent to eValue's facilities for processing and storage.   | Yes                 | Yes                    | UK                 |

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|---|---|--|---------------------|------------------------|--------------------|
| Glia                                    | Viru väljak 2, 6th floor,<br>Tallinn, Estonia, 10111                          | This service allows customers to co-browse with their clients and communicate via text, audio, or video. To aid with MIFID ii compliance, Glia records all browsing and communications which means that any documents shared, or discussions had will be recorded and stored by Glia. Glia is a US company however the service they provide to intelliflo is based in EEA. Any recordings are therefore stored in EEA. | Yes                 | Yes                    | EEA                |
| Godel<br>Technologies                   | Charlotte St. Neo Building FI 9, Manchester,<br>M1 4ET, United Kingdom        | Software development, support  | No                  | Yes                    | EEA                |
| Inscale                                 | Inscale Limited Maidstone Road, Kingston,<br>Milton Keynes, England, MK10 0BD | Software development   | No                  | Yes                    | EEA                |
| Mailchimp                               | 675 Ponce De Leon Avenue, Northeast Suite<br>5000 Atlanta, GA 30308 USA       | When customers use the intelliflo office mail campaign functionality this leverages the Mailchimp delivery service   | Yes                 | Yes                    | US                 |
| Maytech<br>Communications<br>Limited    | UK Flag 4 Mount Ephraim Road,<br>Tunbridge Wells, Kent, TN1 1EE               | Secure data transfer solution (Quatrix)  | Yes                 | No                     | EEA                |
| Oxford Risk<br>Research and<br>Analysis | 62 Foxhall Road, Didcot, England, OX11 7AD                                    | If customer uses the OxfordRisk ATR functionality then, in the event of a defect that requires investigation by OxfordRisk, intelliflo may be required to identify the data subject.   | Yes                 | Yes                    | UK                 |
| PCA Predict                             | Waterside, Basin Road, Worcester, WR5 3DA<br>England, United Kingdom          | This service allows customers to verify addresses. To enable this service to work it is necessary to share some details about the client's address, specifically house number, and postcode.   | Yes                 | Yes                    | UK                 |
| Snowflake                               | Riverbank House, 2 Swan Lane, London,<br>England, England, EC4R 3TT           | Warehouse technology, development, support   | Yes                 | Yes                    | UK                 |

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| intelliflo affiliate  | Vendor address   | Services provided     | Storage | Access | Location |
|---|--|-----------------------|---------|--------|----------|
| intelliflo<br>(established in<br>New Hampshire<br>as RedBlack<br>Software, LLC) | 1 Bedford Farms Drive<br>Suite 104<br>Bedford<br>New Hampshire 03110 | Intra-company support | No      | Yes    | US       |

## Vendors accessing intelliflo's cloud-based SaaS environment

intelliflo have put specific processes in place to govern and monitor vendors requesting access, what they are requesting access to, why they need access and for how long.

In addition, there are specific technical controls in place to ensure that personal data cannot leave the control environment regardless of the member of intelliflo's personnel or the location they are accessing from.

Additionally, intelliflo has implemented technical controls in its corporate environment to ensure that personal data is not arriving from intelliflo's cloud-based SaaS environment. The controls applied to the Approval Process is as follows:

- Workflow driven which forms requesting details such as scope and rationale.
- Mandatory approval is required from Line Manager or Cloud Operations Engineer.
- All access requests both approved and rejected are tracked and audited.
- All access is time limited default is 8 hours.
- All access is based on least privilege and so is limited in scope to what is required whenever possible.

## Updates to this page

The changing needs of our products and our business may impact the vendors we use. This page therefore will be subject to periodic updates which will reflect the changes made to sub-processors.

## **Notification of changes**

Request for notifications of changes should be directed to dataprotection@intelliflo.com with 'Sub-processor Changes' as the subject heading.

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