



# Trekea Sub-Processors List

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Valid until superseded

## 1. Introduction

As part of its compliance with the General Data Protection Regulation (GDPR) and applicable Data Protection Laws, Trekea Mobile maintains and makes available this list of the sub-processors it engages in the delivery of its products and services to customers.

This document lists sub-processors engaged by Trekea to process Personal Data in connection with the delivery of FieldLogs software and services. Sub-processors involved solely in implementation activities are not included in this document, as they may vary on a customer-by-customer basis and will be described in the applicable Statement of Work or Order Form for such implementation.

## 2. Definitions

The following definitions apply in this document and are consistent with those used in the Data Processing Addendum:

**Sub-processor:** Any Processor engaged by Trekea, by an Affiliate of Trekea, or by another Sub-processor, including Affiliates of Trekea acting as Processors.

**Processing:** Any operation or set of operations performed upon Personal Data, whether or not by automatic means, such as collection, recording, organisation, storage, adaptation, retrieval, consultation, use, disclosure by transmission, or erasure.

**Personal Data:** Any information relating to an identified or identifiable natural person and, where applicable, an identified or identifiable legal entity, where such data is Customer Data.

**Controller:** The entity which determines the purposes and means of the processing of Personal Data. For the purposes of this document, the Customer is the Controller.

**Processor:** The entity which processes Personal Data on behalf of the Controller. Trekea acts as Processor in relation to Customer Personal Data.

**Standard Contractual Clauses (SCCs):** The standard contractual clauses for the transfer of Personal Data to third countries adopted by the European Commission under Decision (EU) 2021/914, or equivalent transfer mechanisms as applicable.

**Data Privacy Framework (DPF):** The EU-U.S. Data Privacy Framework (and equivalent UK and Swiss extensions), providing an adequacy mechanism for transfers of Personal Data from the EEA/UK/Switzerland to the United States.

**EEA:** The member states of the European Union, Iceland, Liechtenstein and Norway.

## 3. Scope

This document covers sub-processors engaged in the delivery of the following services provided by Trekea:

**FieldLogs Services:** Cloud-hosted delivery of the FieldLogs Software, including infrastructure hosting, support services, and embedded third-party software components.

**Third-Party Software Components:** Third-party software products distributed as integrated or embedded components of FieldLogs, each operating with its own sub-processors as listed in Section 5.

Note: FieldLogs can be deployed as both a Trekea service within a customer's chosen (and Trekea-approved) hosting environment and as an on-premise deployment. Where an on-premise deployment is agreed in the applicable Order Form, sub-processors listed in Sections 4 and 5 as supporting the hosted cloud delivery do not apply.

## 4. FieldLogs Sub-Processors

The following sub-processors are engaged by Trekea in the delivery of FieldLogs:



| Corporate Name                  | Service Description                                                                                                                               | Data Processing                                                                                                                                        | Control Measures                                                                                         | Country & Data Centre                                                                                                   | Contact Information                                                                       | Transfer Mechanism         |
|---------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|----------------------------|
| Trekea Mobile Inc.              | Regional R&D, product engineering, level-3 support for FieldLogs Software FieldLogs Software platform, FieldLogs hosted services, support and R&D | All Personal Data categories processed under the Agreement; system logs; support data; Technical support data; system logs; anonymised diagnostic data | Trekea Global ISMS; Trekea DPA; Trekea Info Security Standard                                            | Global R&D in Paris (France), India, USA. Data centre region per Order Form                                             | Trekea Mobile, Inc. 855 Village Center Drive, Suite 309 North Oaks MN 55127 UNITED STATES | SCCs / DPF (as applicable) |
| Trekea SAS                      | Global R&D, product engineering, level-3 support for FieldLogs Software FieldLogs Software platform, FieldLogs hosted services, support and R&D   | All Personal Data categories processed under the Agreement; system logs; support data; Technical support data; system logs; anonymised diagnostic data | Trekea Global ISMS; Trekea DPA; Trekea Info Security Standard                                            | Global R&D in Paris (France), India, USA. Data centre region per Order Form                                             | Trekea SAS 76 rue de la Pompe, 75116 Paris FRANCE                                         | SCCs                       |
| Microsoft Corporation (Azure)   | Cloud platform infrastructure (IaaS/PaaS) hosting FieldLogs                                                                                       | All Personal Data processed in the cloud environment; encryption key management via MS Key Vault                                                       | Microsoft DPA; ISO 27001; SOC 2 Type II; MS Key Vault for encryption key management within agreed region | Data centre location specified in the applicable Order Form. Off-site GRS backup paired within the same region          | One Microsoft Way, Redmond, WA 98052, USA. +1 425-882-8080                                | SCCs                       |
| Amazon Web Services, Inc. (AWS) | Cloud platform infrastructure (IaaS/PaaS) hosting FieldLogs                                                                                       | All Personal Data processed in the cloud environment; encryption key management via AWS KMS                                                            | AWS DPA; ISO 27001; SOC 2 Type II; AWS KMS for encryption key management within agreed region            | Data centre location (AWS Region) specified in the applicable Order Form. Off-site backup paired within the same region | 410 Terry Avenue North, Seattle, WA 98109, USA. +1 206-266-1000                           | SCCs                       |

## 5. Third-Party Software Sub-Processors

The following sub-processors are associated with third-party software components distributed as integrated or embedded parts of the software provided by Trekea:

| Corporate Name                | Service Description                                                                      | Data Processing                                                                                 | Control Measures                                                          | Country & Data Centre                                        | Contact Information                                        | Transfer Mechanism |
|-------------------------------|------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------|--------------------------------------------------------------|------------------------------------------------------------|--------------------|
| Microsoft Corporation (Azure) | Cloud platform services supporting third-party software components embedded in FieldLogs | Azure Service Provision; MS Key Vault secure management of encryption keys within agreed region | Microsoft DPA; ISO 27001; SOC 2 Type II; MS Key Vault for encryption keys | Data centre location specified in the contract with customer | One Microsoft Way, Redmond, WA 98052, USA. +1 425-882-8080 | SCCs               |
| Amazon Web                    | Cloud platform services                                                                  | AWS Service Provision; AWS                                                                      | AWS DPA; ISO 27001; SOC 2                                                 | Data centre location specified                               | 410 Terry Avenue North,                                    | SCCs               |



| Corporate Name       | Service Description                                              | Data Processing                                               | Control Measures                     | Country & Data Centre         | Contact Information                     | Transfer Mechanism |
|----------------------|------------------------------------------------------------------|---------------------------------------------------------------|--------------------------------------|-------------------------------|-----------------------------------------|--------------------|
| Services, Inc. (AWS) | supporting third-party software components embedded in FieldLogs | KMS secure management of encryption keys within agreed region | Type II; AWS KMS for encryption keys | in the contract with customer | Seattle, WA 98109, USA. +1 206-266-1000 |                    |

6. Sub-Processor Change Notifications

Trekea will notify customers of any new sub-processor or material change to an existing sub-processor before authorising such sub-processor to Process Personal Data, in accordance with the notification mechanism set out in the Data Processing Addendum.