

Sitoo sub-processor policy

Introduction

Sitoo uses certain sub-processors (including intra group entities and third parties, as listed below) to assist in providing the Sitoo POS and Unified Commerce Platform and related services, as described in the Merchant Agreement.

What is a sub-processor

A sub-processor is a third-party data processor engaged by Sitoo (the Processor) who receives Customer Data (which may contain Personal Data) from the Processor for Processing on behalf of the Merchant (i.e. the Controller) and in accordance with the Controller's instructions (as communicated by the Processor) and the terms of its written subcontract. Sitoo engages different types of sub-processors to perform various functions as explained in the table below.

Process to engage new sub-processors

Pursuant to the DPA between Sitoo and the Merchant, Sitoo will provide notice of updates to the list of sub-processors that Sitoo proposes to utilize to deliver the Service. Sitoo undertakes to keep this list updated regularly to enable the Merchant to stay informed of the scope of sub-processing associated with the Service. Further, a Controller may object in writing to the Processing of its Personal Data by a new sub-processor proposed to be appointed by Sitoo, within the fourteen (14) days notice period prior to the update and such objection shall describe Controller's legitimate reason(s) for objection. If Controller does not object during such time period, the new sub-processor(s) shall be deemed accepted.

List of sub-processors

The following is an up-to-date list of the names, entity type, and locations of sub-processors that the Controller has authorised Sitoo to use:

Service and legal name	Address	Processing location	Description	Comment
Hosting service				
Amazon Web Services Sweden AB CRN 556833-3503	Kungsgatan 49 111 22 Stockholm Sweden	EU/Ireland	Amazon Web Services provides the cloud service which hosts the Sitoo POS and Unified Commerce Platform. The Controller's data will be recorded and stored within the cloud service.	
Support services				
Visma EssCom AB CRN 556478-3933	Gårdsfogdevägen 5 168 67 Bromma Sweden	EU/Sweden	Visma provides on-call First-Line Support on behalf of Sitoo. The Controller's data in respect of staff calling the support will be recorded and stored by Visma.	
Zendesk	1019 Market St. San Francisco, CA 94103 United States of America	EU/Ireland	Zendesk provides a support matter management software used by Sitoo. The Controller's data in respect of support matters will be recorded and stored in the	European Commission's Standard Contractual Clauses (SCC) implemented.

			software.	
Fiscalization Add-ons				
InfraSec Sweden AB CRN 556624-1674	Industrivägen 7 171 48 Solna Sweden	EU/Sweden	Infrasec provides control units to customers with stores in Sweden and which orders such Add-on under the Main Agreement.	
fiskaly Germany GmbH	Zeilweg 42 60439 Frankfurt am Main Germany	EU/Germany	Fiskaly provides a cloud-based solution for fiscalization to customers with stores in Germany which orders such Add-on under the Main Agreement.	
Miscellaneous				
Sitoo Limited	Medius House, 2 Sheraton Street, London, W1F 8BH United Kingdom	UK	Sitoo Limited is a wholly owned subsidiary of Sitoo. Accordingly, it functions as sub-processor to provide the Service.	
