

Annex 3 to the Data Processing Agreement (DPA)

List of Sub-Processors

Title, registration number, contact information of sub-processor/	Personal data processing carried out by subprocessor (including, activity, role, information whether all Personal data processed or part of them)	Place of processing (including, access and storage of Personal data)	If Personal data processed outside of EU or EEA, what legal ground for transfer is applied and what safeguards applied (e.g., adequacy decision of EU, EU standard contractual clauses, Privacy Shield etc.)	Security measures applied for processing and protection of Personal data (encryption etc.)
Google Cloud Google Cloud EMEA Limited, 70 Sir John Rogerson's Quay, Dublin 2, Ireland	-Cloud services - storage and processing for core business. - All personal data	Physical: Finland		https://cloud.google.com/security
Sendgrid/ Twilio Inc. Twilio Inc., a Delaware corporation, with a place of business at 101 Spear Street, 1st Floor, San Francisco, California, 94105, United States of America www.sendgrid.com	-Email delivery platform that enables to send and manage email communications. Creation of email campaigns. Also bounce handling, unsubscribe management, and IP warmup. -E-mail address -E-mail content incl. First/Last name most often -Received / Opened / Clicked data	US (Contract made before 03.08.2021)	Revised DPA https://www.twilio.com/en-us/gdpr	SOC 2 Type 2 (Trust Service Principles: Security & Availability) PCI DSS Level 4 TLS v1.1 or higher for emails in transit between Customer's software application and the recipient's email server. Security overview: https://www.twilio.com/legal/security-overview
Directo Directo OÜ Local business registry code 10652749; address Mõisa 4, Tallinn, 13522 Estonia www.directo.ee	Used for automating financial processes, such as invoicing, expenses, and bookkeeping.	Estonia and EU		ISO 27001:2013

Everypay Everypay AS Local business registry code 12280690,	Payment services and solutions. It allows to accept payments from customers through various channels, such	Estonia and EU		EveryPay payment platform is PCI DSS level 1 certified.
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address: VäikeKarja 12, 10148 Tallinn, Estonia www.everypay.com	as credit cards, debit cards, bank transfers			
LHV	Banking service provider	Estonia and EU		Licensed bank
Vero Vero Holdings Australia Pty Ltd. 251 Riley Street Sydney, New South Wales2010	Customer relationship management (CRM) tool. <ul style="list-style-type: none"> • First name, Last name • Email • Customer ID • Received / Opened / Clicked data • Optional data 	Australia, US	DPA SCC Revised 15.02.2023	SOC 2 All databases are encrypted at rest, applications encrypt in transit with TLS/SSL only. https://www.getvero.com/security/
Google Ireland Ltd (Ads, Analytics, Tag Manager)	<ul style="list-style-type: none"> • Data gathered from Google login • First name (from exports for exclusions purposes) • Last name (from exports for exclusions purposes) • Email (from exports for exclusions purposes) Customer Communications Branding Marketing ad campaigns	Parent: US EU body: Ireland	https://business.safety.google/adsprocessorterms/	https://business.safety.google/data-safety/marketersand-publishers/

Meta Platforms Ireland Ltd	<ul style="list-style-type: none"> • First name • Last name • Email Exclusion purposes for our marketing campaigns if needed	Parent: US EU body: Ireland	Standard terms (DPA SCC)	https://www.facebook.com/business/gdpr
Helpscout	Platform is used to communicate with Users.	US	DPA SCC	https://www.helpscout.com/company/legal/security/
	User data, which is provided by User itself. E-mail, name, phone number, PIN, transaction data (ticket number)			
Freshdesk Freshworks Inc. (US). Contact: Tower B, 5th floor c/o CoWrks New Indiranagar Swamy Vivekananda Road, Sadanandanagar, Bennigana Halli, Bengaluru - 560 016	User communication (mostly chat). Will be closed 27th of July 2023. User data, which is provided by User itself. E-mail, name, phone number, PIN, transaction data (ticket number).	India US	DPA SCC	Freshworks encrypts personal data at rest and in transit protecting it from interception from US government surveillance agencies. We use AES 256 bit encryption for data at rest and HTTPS with TLS 1.2 encryption for data in transit, meaning that it will be intelligible to third parties. We are also certified with ISO 27001 and undergo SOC 2 type 2 audit by independent third party firms.

Signatures of the Parties:

On behalf of Controller Riigi Kaitseinvesteeringute Keskus Ivar Janson <i>/signed digitally/</i>	On behalf of Processor Stebby OÜ Karl-Eduard Möldre <i>/signed digitally/</i>
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