

Happydance - Sub-Processor Information Table

Document control

Version	2.7
Issue date	22 October 2026
Document owner	Helen Adams, Information Security Manager
Sub-processors listed	15, plus Microsoft Clarity listed for transparency as an independent controller
Canonical published version	https://www.happydance.love/legal

Sub-Processor	Description of Processing	Location of Processing
Microsoft Azure (Address: Redmond, WA, USA)	Production cloud hosting, job post indexing through Azure AI Search, and Microsoft Entra ID for back-office identity and access management. The job search index holds job and website content, not candidate CV content. Microsoft Azure AI Vision generates image alt text for the AI Content Advisor in the CMS, in the same Azure region as the customer's CMS; images are processed in real time and are not retained after processing, and customer data is not used to train models.	USA (region per customer deployment)
Cloudflare, Inc. (Address: 101 Townsend St, San	Content Delivery Network, Web Application Firewall, DDoS protection, bot and scrape management, TLS	USA/Global

Francisco, CA 94107, USA)	termination and rate limiting. Processes traffic metadata only; no candidate application data or CV content.	
Google LLC (Address: 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA)	Analytics and tag management through Google Analytics 4, Google Tag Manager and Data Studio, supporting website performance insights, conversion tracking and reporting. Consent-gated through the cookie management platform. Behavioral and engagement data only, pseudonymous at collection and aggregated at the reporting layer; no candidate application data, CV content or personal identifiers.	USA/Global
Google LLC (Google Maps Platform) (Address: 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA)	Location lookup supporting the radius search feature on the careers website, engaged only where the customer has purchased radius search. The Google Maps JavaScript API and Places API are loaded into the candidate's browser when the candidate uses the location field, so Google receives the location text the candidate enters, the candidate's IP address as an attribute of the browser connection, and, where the candidate selects the "use my location" option, the coordinates returned by the browser geolocation API. No candidate application data, resume content, name or email address is transmitted. Requests are made under an API key issued to	USA/Global

	Happydance except where the customer supplies its own key.	
Google LLC (Google Cloud Talent Solution) (Address: 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA)	Alternative job search index supporting radius search and military occupational specialty code search, engaged only where the customer has purchased those features. Job content is indexed from the customer's feed. Candidate search queries, including the keyword or occupational specialty code entered and any location term, are submitted from Happydance servers to the Google Cloud Talent Solution API. The query is made server to server, so the candidate's IP address is not disclosed to Google through this service. No candidate application data, resume content, name or email address is transmitted.	USA
Microsoft Corporation (Microsoft Clarity) One Microsoft Way, Redmond, WA 98052, USA	Optional session analytics and heatmaps on customer careers websites. Enabled per customer and loaded only after the visitor consents to analytics cookies. Microsoft acts as an independent controller of Clarity data under the Microsoft Clarity Terms of Use; it is not engaged as a processor under the Happydance DPA. Listed here for transparency.	USA/Global

Vercel Inc. (Address: 340 S Lemon Ave #4133, Walnut, CA 91789, USA)	Front-end application hosting and content delivery for the Happydance platform, covering both the candidate-facing careers website front end and the My Happydance customer portal (my.happydance.website). Processes customer back-office user email addresses for single sign-on login to the portal; these are stored in the portal database hosted by Neon. Delivers front-end content to visitors. Resume-extraction requests are also routed through Vercel AI Gateway to an inference provider. A single extraction service supports both Job Match and the easy-apply overlay, so the gateway is engaged where the customer has either feature enabled and is not engaged where the customer has neither. Text extracted from the candidate's resume is transmitted once per upload and a structured profile is returned. Inference only, with no model training on customer or candidate data. Zero Data Retention is enabled on the gateway, so neither the transmitted text nor the returned profile is retained by the gateway or by the inference provider. Gateway logging is limited to request metadata, being time, status, model, provider, token counts, cost and duration. No prompt or response content is logged and no trace drain to	USA/Global
---	--	------------

	an external observability backend is configured. Requests are made under Vercel's system credentials, which is the configuration under which Zero Data Retention is available. The inference provider serving these requests is engaged by Vercel under Vercel's own sub-processor arrangements and is not contracted directly by Happydance.	
Amazon Web Services, Inc. (Address: 410 Terry Ave North, Seattle, WA 98109, USA)	Underlying cloud infrastructure for sub-processors including Vercel and Neon.	USA/Global
Databricks, Inc. (Neon) (Address: 160 Spear Street, 15th Floor, San Francisco, CA 94105, USA)	Neon managed PostgreSQL database for the My Happydance customer portal (my.happydance.website), provisioned through Vercel and hosted on Amazon Web Services in the London region. Databricks, Inc. is the contracting entity; its subsidiary Neon, LLC provides and bills the service. Stores the portal's authentication sessions and the account details of customer back-office users, including the email addresses used for single sign-on login. Portal users sign in only by single sign-on, so no passwords are stored. Also stores portal content and customer configuration, including content management system connection settings. No candidate application data or resume content is stored. Engaged	UK (London)

	for every customer with users on the My Happydance portal. Databricks acts as processor under its data processing addendum and engages its own sub-processors, listed by Databricks.	
SendGrid, Inc (Address: Denver, CO, USA)	Transactional email delivery, including job alert and system notification emails.	USA
Atlassian (JIRA) (Address: Sydney, Australia)	Support desk ticketing.	Australia/Global
UptimeRobot s.r.o. (Address: Obchodná 507/2, 811 06 Bratislava, Slovak Republic)	External endpoint uptime monitoring (no personal data).	EU (Slovak Republic), with monitoring infrastructure in the EU, USA, Asia and Oceania
New Relic, Inc. (Address: 188 Spear Street, Suite 1000, San Francisco, CA 94105, USA)	Application and infrastructure performance monitoring (no personal data).	USA
OpenAI OpCo, LLC. (Address: 3180 18th St, San Francisco, CA 94110, USA)	Conversational Navigation responses, Culture Compass explanatory summaries, Job Match search query construction, and the AI Content Advisor in the CMS. Inference only, stateless, no model training on customer or candidate data, prompt logging not enabled. In Job Match the model constructs the search query only. The match score, the match band and the explanatory text shown to the candidate are produced by deterministic Happydance code and by	USA

	content managed in the content management system, not by an AI model. Alignment banding in Culture Compass is likewise computed by deterministic Happydance code. Executed data processing addendum between Phuse Technology Limited and OpenAI OpCo, LLC effective 17 August 2026, incorporating EU SCCs Modules 2 and 3 as amended by the UK Addendum, governed by the laws of England and Wales with the ICO as competent supervisory authority. Module 2 applies where the customer is controller, Module 3 where the customer is processor. OpenAI acts as processor, must notify a personal data breach without undue delay, and must assist with data protection impact assessments. Where data falls within EEA or Swiss law, OpenAI Ireland Limited is instructed to carry out the processing, with onward transfer outside the EEA under SCCs. Abuse monitoring logs retained up to 30 days by default.	
Groq, Inc. (Address: 1600 Adams Dr, Menlo Park, CA 94025, USA)	Contracted for resume extraction and not currently in use. Groq was the intended inference provider for the resume-extraction service supporting Job Match and the easy-apply overlay. No candidate data is sent to Groq at the date of this issue. The entry is	USA

	retained on the register so that bringing the service into use does not require a new notification cycle. If brought into use it would be engaged only where the customer has Job Match or the easy-apply overlay enabled.	
CultureHQ, Inc. (Address: 2 Ave de Lafayette, Boston, MA 02111)	Employee Stories: an embedded platform through which a customer's employees contribute video and written stories for the careers website. Supports SSO login and serves content via secure API. Processes content contributed by the customer's employees, not candidate data. Includes AI-assisted features that help employees draft and refine their own contributions and help administrators create campaigns and edit approved content. No AI feature makes a decision about or produces a score for any individual, and human review is required before publication. CultureHQ engages its own sub-processors for AI inference, speech to text and media processing; the list is available on request. CultureHQ's AI inference provider retains inputs and outputs for up to 30 days for abuse and safety monitoring and does not train on them. Engaged only where the customer has purchased Employee Stories.	USA (one optional audio tool processed in the EEA)

Version history

Version	Date	Changed by	Summary of change
2.7	22 October 2026	Jim Taylor	Databricks, Inc. (Neon) added as a sub-processor. Neon, a Databricks company, hosts the PostgreSQL database behind the My Happydance customer portal, in the London region, and has done so since the portal launched on 14 April 2026. Vercel entry corrected: Vercel processes customer back-office user email addresses for single sign-on login but does not store them; they are stored in the portal database hosted by Neon. Amazon Web Services entry extended to record that it underlies Neon. Microsoft Azure entry extended to record Azure AI Vision for AI Content Advisor image alt text. The sub-processor count is now 15. Uptime Robot entry corrected to its legal entity, UptimeRobot s.r.o. (Obchodná 507/2, 811 06 Bratislava, Slovak Republic), and its location of processing restated as the EU with monitoring infrastructure in the EU, USA, Asia and Oceania. The previous entry gave a hosting location (Dallas, TX, USA) rather than the contracting entity. No change to the service or the data processed.
2.6	16 October 2026	Jim Taylor	CultureHQ, Inc. added as a sub-processor for Employee Stories. Versions 1.0 and 1.1 were issued

			without version numbers, which are assigned here retrospectively.
2.5	13 October 2026	Jim Taylor	Microsoft Clarity restated as an independent controller rather than a processor: Microsoft states it acts as data controller for Clarity and does not sign processor or joint-controller terms with Clarity customers. Clarity remains listed for transparency; the sub-processor count is now 14. Job Grader removed from the OpenAI row: it is a CMS feature and does not use AI.
2.4	17 September 2026	Jim Taylor	Vercel row corrected following engineering confirmation of 17 September 2026. Resume extraction is a single shared service supporting both Job Match and the easy-apply overlay, so the gateway is engaged for either feature and the previous Job Match only scoping is withdrawn. Zero Data Retention recorded as enabled, gateway logging recorded as request metadata only with no prompt or response content and no trace drain configured, and requests recorded as made under Vercel system credentials. OpenAI row extended to record Job Match search query construction and to state that the match score, band and candidate-facing explanatory text are produced by deterministic Happydance code and CMS content. Groq row rescoped from Job Match to the shared resume-

			extraction service. No change to the number of sub-processors.
2.3	15 September 2026	Jim Taylor	Groq row restated as contracted and not currently in use, and the Vercel row extended to record that Job Match resume-extraction requests are routed through Vercel AI Gateway to the inference provider. The previous Groq wording described Groq as the live extraction provider with Zero Data Retention and is withdrawn. No change to the number of sub-processors.
2.2	15 September 2026	Jim Taylor	Google Maps Platform and Google Cloud Talent Solution added as separate Google entries, bringing the total to 15. Google Maps Platform covers location lookup for the radius search feature and is loaded in the candidate's browser. Google Cloud Talent Solution covers the alternative job search index used for radius search and military occupational specialty code search, and is queried from Happydance servers. Both are engaged only where the customer has purchased the relevant feature.
2.1.1	15 September 2026	Jim Taylor	Document control block and version history added. No change to sub-processor entries.
2.1	2 September 2026	Jim Taylor	Vercel entry corrected to record candidate-facing careers website front-

			end delivery in addition to the My Happydance customer portal.
2.0	18 August 2026	Happydance InfoSec	OpenAI entry corrected to record that relevance scoring in Job Match and alignment banding in Culture Compass are computed by deterministic Happydance code, and that SmartApply is not a live feature. Microsoft Clarity added, bringing the total to 13. Azure, Cloudflare, Google, New Relic and SendGrid descriptions corrected. Consent gating stated for both analytics recipients.
1.1	12 January 2026	Jim Taylor	Kombo Technologies, LLC removed (no longer in use). Vercel, Inc. added for the Happydance Customer Portal. Groq, Inc. added for resume extraction in Job Match (later confirmed as contracted and not in use; see 2.3). Also listed: Cloudflare, Google, Amazon Web Services, New Relic and OpenAI. 11 sub-processors. Partners with contractual notice rights notified on 12 January 2026.
1.0	December 2024	Happydance	Earliest list held: Microsoft Azure, Kombo Technologies, LLC, SendGrid, Atlassian (Jira) and Uptime Robot. 5 sub-processors.