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Happydance - Sub-Processor Information Table

Document control

Version	2.9
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Document owner	Helen Adams, Information Security Manager
Sub-processors listed	14, plus Microsoft Clarity listed for transparency as an independent controller and not included in the count
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 search indexing through Azure AI Search (job and website content only, not candidate resume content) and Microsoft Entra ID for back-office sign-in. Azure AI Translator machine-translates CMS dictionary items and content and, on careers websites with more than one language, AI-generated image alt text; it receives text only, not images, and Microsoft does not store the text. On some legacy careers websites, Azure AI Vision generates image alt text for the AI Content Advisor; Microsoft does not retain the image or use it for training.	UK, EU or USA (region per customer deployment); Azure AI Translator and Azure AI Vision have no fixed region

Cloudflare, Inc. (Address: 101 Townsend St, San Francisco, CA 94107, USA)	Content delivery network, web application firewall, DDoS protection, bot and scrape management, TLS termination and rate limiting. Cloudflare R2 stores media uploaded to careers websites on our current platform, which can include images of employees. Cloudflare does not store candidate application data or CV content.	USA/Global
Google LLC (Address: 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA)	Google Analytics 4, Google Tag Manager and Data Studio for careers website analytics and reporting, consent-gated through the cookie management platform. Pseudonymous at collection and aggregated in reporting; no application data or resume content. Events include search terms candidates type, including questions typed into Conversational Navigation, which could contain personal information if a candidate enters it. Where Job Match or Culture Compass is enabled, this includes the candidate's Job Match result (a label such as "strong match" or "not a close match", with no score or resume content) and, for Culture Compass, the candidate's answer to each question and their overall result band, recorded against the pseudonymous analytics ID. Where enabled, Google Analytics 4 data is exported to Google BigQuery, with the dataset location set per	USA/Global; BigQuery dataset location set per customer (USA, UK or EU)

	customer. Where AI Insights is enabled, Happydance reads that customer's BigQuery export and, if the customer grants access, its Google Search Console data, each through a Happydance service account with access to that customer only; the customer adds the Search Console account as a restricted user.	
Google LLC (Google Maps Platform) (Address: 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA)	Location lookup for radius search, engaged only where purchased. The Maps JavaScript and Places APIs run in the candidate's browser, so Google receives the location text entered, the candidate's IP address and, if the candidate chooses "use my location", the browser's coordinates. No application data, resume content, name or email address. Requests use Happydance's API key unless the customer supplies its own.	USA/Global
Google LLC (Google Cloud Talent Solution) (Address: 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA)	Alternative job search index for radius search and military occupational specialty code search, engaged only where purchased. Job content is indexed from the customer's feed. Candidate search terms are sent from Happydance servers, so the candidate's IP address is not disclosed to Google. No application data, resume content, name or email address.	USA

Microsoft Corporation (Microsoft Clarity) One Microsoft Way, Redmond, WA 98052, USA	Optional session analytics and heatmaps, enabled per customer and loaded only after the visitor consents to the cookie category agreed with the customer. Microsoft acts as an independent controller under the Microsoft Clarity Terms of Use, not as a processor under the Happydance DPA. Listed for transparency and not counted.	USA/Global
Vercel Inc. (Address: 340 S Lemon Ave #4133, Walnut, CA 91789, USA)	Front-end hosting and content delivery for the careers website and the My Happydance customer portal (my.happydance.website). Processes back-office user email addresses for portal single sign-on; these are stored by Neon. AI Insights, where enabled, runs on portal functions in the United States, with its data stored by Neon. Vercel AI Gateway routes two features to inference providers: resume extraction for Job Match (engaged where Job Match is enabled), and Conversational Navigation, the candidate-facing assistant, on careers websites running its current version. Zero Data Retention is enabled on the gateway, so prompts and outputs are not retained by the gateway or the inference provider; requests use Vercel's system credentials, the configuration under which Zero Data Retention applies. Gateway logging is	USA/Global

	request metadata only (time, status, model, provider, token counts, cost and duration), with no prompt or response content and no trace drain. Inference only, no model training on customer or candidate data and no automated decision about any candidate. Inference providers hold zero data retention agreements with Vercel, are engaged through the gateway and are not contracted 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)	Managed PostgreSQL database for the My Happydance customer portal, provisioned through Vercel on Amazon Web Services in London. Databricks, Inc. is the contracting entity; its subsidiary Neon, LLC provides the service. Engaged only for customers with users on the portal. Stores portal sessions, back-office user account details including single sign-on email addresses, portal content and customer configuration, which is encrypted with AES-256 at rest. No application data or resume content. Where AI Insights is enabled, also stores aggregated careers website analytics, generated insights and reports, portal users' questions, and search terms and	UK (London)

	Search Console queries used five or more times, with email addresses, phone numbers, long digit runs and URLs removed. Databricks acts as processor under its data processing addendum and lists its own sub-processors.	
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
OpenAI OpCo, LLC. (Address: 3180 18th St, San Francisco, CA 94110, USA)	Inference for resume parsing for the easy-apply overlay where resume parsing is enabled (the text of the uploaded resume is sent to prefill the application form); Culture Compass explanatory summaries; Job Match search query construction; Conversational Navigation responses on careers websites not yet running its current version (see Vercel); the AI Content Advisor in the CMS, including, on careers websites on our current platform, alt text generated for images saved to the media library without it (images may show people, such as	USA

	employees); summaries of error messages returned by applicant tracking systems to the easy-apply overlay, which can repeat what a candidate entered; and, where AI Insights is enabled, narration of insights and answers to portal users' questions from aggregated analytics. Inference only, with no model training on customer or candidate data. OpenAI may retain inputs and outputs, including abuse monitoring logs kept for up to 30 days by default. Job Match scores, bands and explanations, and Culture Compass banding, come from deterministic Happydance code and CMS content, not an AI model. Data processing addendum executed 17 August 2026, incorporating EU SCCs Modules 2 and 3 and the UK Addendum, under the laws of England and Wales with the ICO as supervisory authority; OpenAI Ireland Limited processes data within EEA or Swiss law.	
Groq, Inc. (Address: 1600 Adams Dr, Menlo Park, CA 94025, USA)	Contracted for resume extraction for Job Match. This contract is not in use. Kept on the register so that bringing it into use needs no new notification cycle.	USA
CultureHQ, Inc. (Address: 2 Ave de Lafayette, Boston, MA 02111)	Employee Stories, engaged only where purchased: an embedded platform where a customer's employees	USA (one optional audio

	contribute video and written stories, with SSO login and content served by secure API. Processes employee content, not candidate data. AI features help employees draft their contributions and administrators create campaigns and edit approved content; none scores or makes a decision about any individual, and human review is required before publication. CultureHQ engages its own sub-processors for AI inference, speech to text and media processing (list available on request); its AI inference provider retains inputs and outputs for up to 30 days for abuse and safety monitoring and does not train on them.	tool processed in the EEA)

Version history

Version	Date	Changed by	Summary of change
2.9	16 November 2026	Jim Taylor	Vercel and Groq entries corrected: the AI gateway handles resume extraction for Job Match, not for the easy-apply overlay, which parses resumes through OpenAI. OpenAI entry: easy-apply overlay resume parsing, alt text for images on the current platform and summaries of applicant tracking system error messages added; retention restated. Microsoft Azure entry: Azure AI Vision restated as used on some legacy careers websites, and Azure AI

			Translator added. Cloudflare entry: R2 media storage added. Google analytics entry: search terms candidates type, the Job Match result label, and the candidate's answers to each Culture Compass question and their overall result band, recorded. New Relic, Inc. removed: it is no longer used. Neon entry restated. 14 sub-processors.
2.8	11 November 2026	Jim Taylor	AI Insights purposes added to the Databricks (Neon), OpenAI, Google and Vercel entries; they apply only where a customer enables AI Insights, a My Happydance portal feature not yet generally available. Conversational Navigation moves from OpenAI to Vercel AI Gateway as each careers website is upgraded; the Vercel and OpenAI entries record both routes during the move. Google entry records the BigQuery export, with its location set per customer. Neon entry records AES-256 encryption of customer configuration at rest. Microsoft Clarity consent wording corrected to the cookie category agreed with the customer. Microsoft Azure location restated. Microsoft Clarity is listed for transparency and not counted; the totals at versions 2.0 and 2.2 included it and are left as issued. Descriptions shortened throughout, with no change to the processing described. 15 sub-processors.

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.