

Happydance - Sub-Processor Information Table

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.	USA (region per customer deployment)
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. Processes traffic metadata only; no candidate application data or CV content.	USA/Global
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

Microsoft Corporation (Microsoft Clarity) One Microsoft Way, Redmond, WA 98052, USA	Website behavior analytics including heatmaps and session insights, deployed on the careers website to inform user-experience analysis and recommendations. Consent-gated through the cookie management platform. Pseudonymous behavioral and engagement data only; no candidate application data, CV content or personal identifiers.	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). Stores customer back-office user email addresses for single sign-on login. Delivers front-end content to visitors.	USA/Global
Amazon Web Services, Inc. (Address: 410 Terry Ave North, Seattle, WA 98109, USA)	Underlying cloud infrastructure for sub-processors including Vercel.	USA/Global
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
Uptime Robot (Address: Dallas, TX, USA)	External endpoint uptime monitoring (no personal data).	USA

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 and Culture Compass explanatory summaries, plus AI Content Advisor and Job Grader in the CMS. Inference only, stateless, no model training on customer or candidate data, prompt logging not enabled. Relevance scoring in Job Match and alignment banding in Culture Compass are computed by deterministic Happydance code, not by an AI model. 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	USA

	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)	Job Match CV extraction. Text extracted from the candidate's CV is transmitted once per upload and parsed into a structured profile. Inference only. Zero Data Retention is enabled on the Happydance organization account, so inputs and outputs are not stored; absent that setting Groq may store inputs and outputs for up to 30 days for reliability and compliance purposes, and Happydance has opted out. No training on customer data. Transfers under EU SCCs Modules 2 and 3 plus the UK International Data Transfer Addendum; governing law Ireland, competent supervisory authority the Irish Data Protection Commission where legally permissible; breach notification within 72 hours; deletion on request within a maximum of 180 days. Engaged only where the customer has Job Match enabled.	USA
CultureHQ, Inc. (Address: 2 Ave de Lafayette, Boston, MA 02111)	Embedded employee storytelling video platform for Employee Stories. Supports SSO login and serves video content via secure API.	USA