GotPhoto

Markets	Tool / System	Name of Sub-processor and Address	Service provided	Purpose of processing	Data Processed	Location of Processing	Transfer Mechanism
All	AWS	Amazon Web Services EMEA Sarl, 38 John F. Kennedy, L-1855, Luxemburg	Cloud Infrastructure and Hosting Services	Provision of cloud infrastructure and hosting services, including data storage, content delivery network (CDN) services, and related technical support.	1) End customer details: Email address, phone number (if applies), first name, last name, 2) Subject details (if applies): First name, last name, group/grade, teacher, gender, birthdate, organization, address, photos 3) Order details: Billing address, purchased products and photos, order amount, order date, delivery address (if applies) 4) Technical data: IP Address, User-Agent / Browser Information, Operating System, Referrer URL, Cookies, Timestamp, Session ID 5) Data analytics: location (based on IP address), device/browser information, where did they come from (referral), user behavior and events (clicks, scrolls, session recordings, task completion, etc)	AWS servers based in the European Union (Frankfurt, Germany)	Intra-group transfers within AWS group covered by EU Standard Contractual Clauses; AWS Inc. certified under the EU–US Data Privacy Framework, UK Extension and Swiss-US Data Privacy Framework (where applicable).
All	Snowflake	Snowflake Computing Netherlands B.V., FOZ Building, Gustav Mahlerlaan 300-314, 1082 ME Amsterdam, Netherlands	Data Warehouse	secure and encrpyted data storage and analysis	all	AWS servers based in the European Union (Frankfurt, Germany)	Intra-group transfers within Snowflake group covered by EU Standard Contractual Clauses; Snowflake Inc. certified under the EU–US Data Privacy Framework, UK Extension and Swiss-US Data Privacy Framework (where applicable).
All	Airbyte	Airbyte, Inc., 2261 Market Street, Suite 4381, San Francisco, CA 94114, United States	Data Integration Engine	consolidation of data in databases and warehouses	all	Servers based in the European Union (Frankfurt, Germany)	Transfers are covered by EU Standard Contractual Clauses
All	Sentry	Functional Software, Inc., 45 Fremont Street, 8th Floor San Francisco, CA 94105, United States	Error Monitoring and Debugging	Monitor application errors and exceptions in real-time to identify, diagnose, and resolve issues quickly, ensuring application reliability.	Technical data related to application errors and crashes, including error messages, stack traces, and device/browser information. Personal data is minimized but may be captured incidentally.	Servers based in the United States	Sentri.io certified under the EU–US Data Privacy Framework, UK Extension and Swiss-US Data Privacy Framework; in case of invalidation international transfers are covered by EU Standard Contractual Clauses.

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All	Uptrace	Uptrace, Chisinau, Moldova	Application Performance and Infrastructure Monitoring	1) Monitor and analyze application performance, infrastructure health, and system metrics to ensure optimal functioning and reliability of the services. 2) Sort logs to determine and solve issues with photo uploads, when receiving a bug report or other issue report from photographer.	Technical telemetry generated during the operation and use of the GotPhoto platform, including application traces, application logs (with personal data redacted), technical identifiers and, where applicable, limited infrastructure and network metadata required for application monitoring and troubleshooting.	Servers based in Germany (backups in Finland)	
All	PostHog	PostHog, Inc., 2261 Market Street #4008, San Francisco, CA 94114, United States	Analytics	Track user behavior and interactions on the website or application to improve product performance, troubleshoot issues, and optimize user experience.	1) anonymous session identifier for online shop visitors (cookie-based); 2) behavioural and usage data relating to interactions in the onlins shop (e.g. page views, clicks, navigation paths, feature usage, interaction events and session duration); 3) approximate location (city/country derived from IP address; raw IP addresses are not stored) 4) session recordings of user interactions with text and images masked using privacy controls to minimize the collection of personal data	Servers based in the United States	Transfers are covered by EU Standard Contractual Clauses; PostHog, Inc. certified under the EU–US Data Privacy Framework, UK Extension and Swiss-US Data Privacy Framework
All	AWS	Amazon Web Services EMEA Sarl, 38 John F. Kennedy, L-1855, Luxemburg	Communication (Email notifications)	Notify customers (parents) about picture day events, order confirmations, or upcoming buying opportunities	Customer contact information (e.g., email addresses, phone numbers) and relevant message content (e.g., event reminders, order confirmations)	AWS servers based in the European Union (Frankfurt, Germany)	Intra-group transfers within AWS group covered by EU Standard Contractual Clauses; AWS Inc. certified under the EU–US Data Privacy Framework, UK Extension and Swiss-US Data Privacy Framework (where applicable).
UK only	Clickatell	Clickatell, Inc., 900 Island Drive Suite 202 Redwood City, CA 94065 United States	Communication (SMS notifications to UK-based customers)	Notify customers (parents) about picture day events, order confirmations, or upcoming buying opportunities	Customer contact information (e.g., email addresses, phone numbers) and relevant message content (e.g., event reminders, order confirmations)	Clickatell's primary data locations are in AWS Ireland for all messaging and transaction services	??? (staff in US, Canada, South Africa, Nigeria - international data transfers inherent)
All	Qmate	noltesoftware GmbH, Sophienallee 11, 20257 Hamburg, Germany	Image editing	Provide photo editing and enhancement service. Data is processed to customize graphics and enhance the final product delivered to customers	Photographic images and associated metadata, such as image details, provided by the photographer for editing, photographer name, file name, and album name.		
All	ProImageExperts	ProImageExperts LLC., 30405 Solon Road, Suite 9, Cleveland, OH 44139, United States	Image editing	Manual editing, cropping, culling	Photographic images and associated metadata, such as image details, provided by the photographer for editing, photographer name, file name, and album name.	United States (sub-processors in India)	Transfers are covered by EU Standard Contractual Clauses
All	36Pix	36Pix Inc., 9350 Avenue de l'Esplanade, Montréal, QC H2N 1C8, Canada	Image editing	Background removal	Photographic images and associated metadata, such as image details, provided by the photographer for editing, photographer name, file name, and album name.	Canada (sub-processors in the United States)	Transfers are covered by EU Standard Contractual Clauses

All	Pure Photos	TeamDev Management OÜ, Narva mnt 7-559, 10117, Kesklinna linnaosa, Tallin, Estonia	Image editing	Background removal	Photographic images and associated metadata, such as image details, provided by the photographer for editing, photographer name, file name, and album name.	Estonia	Transfers are covered by EU Standard Contractual Clauses
All	Photo Room	Photo Room S.A.S., 229 rue Saint-Honoré, 75001 Paris, France	Image editing	Modification and editing of photos with the use of artificial intelligence	Photographic images and associated metadata, Subject (first name, last name, teacher, group, identifier), Customer (customer name, email, phone number), Job (job name, institution)	France	Transfers are covered by EU Standard Contractual Clauses
Europe only	Photo Labs	various	Photo Lab	Provision of tangible photo products, order processing and delivery (e.g., batch delivery to the photographer's studio).	Customer order information, including images and order details, along with the photographer's contact information. This data is shared with the lab for fulfillment and delivery purposes.		
United Kindom		DIGITALAB, PO Box 2, Norham Road, North Shields, Tyne & Wear, NE29 0YQ, United Kingdom	Photo Lab			UK	
		DS Colour Labs, Unit 12 Bamford Business Park, Hibbert Street, South Reddish, Stockport, SK4 1PL, United Kingdom	Photo Lab			UK	
		Loxley Colour Lab, 1 Drum Mains Park, Orchardton Woods, Glasgow, G68 9LD, United Kingdom	Photo Lab			UK	
		One Vision Imaging, Herald Way, Binley, Coventry, CV3 2NY, United Kingdom	Photo Lab			UK	
		SIMLAB, Unit 8, The IO Centre, Hearle Way, Hatfield, AL10 9EW, United Kingdom	Photo Lab			UK	