Front Systems – Sub-processors

This list contains an overview of the sub-processors that EG uses in connection with the delivery of Front Systems POS, Front Systems Portal and FrontZapp.

Some sub-processors are used exclusively for the provision of elective services. Whether these sub-processors are used thus depends on the individual customer's individual services.

Last updated: 23.11.2022

NAME	ORGANIZATION NUMBER	ADDRESS	DESCRIPTION OF PROCESSING	THIRD COUNTRY TRANSFER
Front Information AS	NO915624634	c/o Front, P.B. 2406 Solli, 0257, Oslo, NO	SMS gateway, embedded service i portalen. Kunderne kan sende SMS fra løsningen.	Yes
Microsoft Ireland Operations Ltd	IE8256796	One Microsoft Place, South County Business Park, D18 P521, Dublin, IE	Hosting - Azure	Yes
Sub-processors to Microsoft Ireland Operations Ltd are provided in special terms				
Zendesk Inc.	DUNS961919805	1019 Markets street, 94103, San Francisco, US	Støttesystem til support (skal erstattes af SNOW).	Yes
Sub-processors to Zendesk Inc. are provided in special terms				
SendGrid, Inc.	DUNS9370111	101 Spear street, CA 94105, San Francisco, US	Mail gateway til brug for levering, styring og analysering af e-mails til kundernes ansatte, cloudløsning.	Yes
Sub-processors to SendGrid, Inc. are provided in special terms				
Segment.io, Inc.	DUNS59206819	101 Spear St FL 1, CA 94105-1580, San Francisco, US	Customer Data Platform	Yes
Sub-processors to Segment.io, Inc. are provided in special terms				
EG Danmark A/S	DK84667811	Lautrupvang 24, 2750, Ballerup, DK	Koncernforbunden leverandør	No
B4Restore A/S	DK27719945	Åhave Parkvej 31, 8260, Viby J, DK	Backup af servere og data	No
team.blue Denmark A/S	DK29412006	Højvangen 4, 8660, Skanderborg, DK	Hosting af servere og data, backup	No
Sub-processors to Front Information AS				

Telenor Norge AS	NO 976967631	Snarøyveien 30, 1360, Fornebu, NO	Teleoperatør	No
Telia Norge AS	NO 981929055	Sandakerveien 140, 484, Oslo, NO	Teleoperatør	No
ICE Communications AS	NO 912672808	Nydalsveien 18 A, 484, Oslo, NO	Teleoperatør	No
Telenor Sverige AB	SE 556350-7804	Katarinavägen 15, 11645, Stockholm, SE	Teleoperatør	No
Strex AS	NO 985867569	Drammensveien 133, 277, Oslo, NO	Betalingsleverandør	No
Sinch UK Ltd (CLX)	UK 03049312	Cap House, 9-12 Long Lane Barbican, EC1A 9HA, London, GB	Aggregator	Yes
OnlineCity ApS	27364276	Buchwaldsgade 50, 5000, Odense C, DK	Aggregator	No
LINK Mobility AS	NO 992434643	Langkaia 1 – Havnelageret, 150, Oslo, NO	Aggregator	No
Systor Vest AS	NO 982326028	Nedre Banegate 19, 4014, Stavanger, NO	Aggregator	No
Sergel Kredittjänster AB	SE 556264-8310	FE 26184, 10526, Stockholm, SE	Aggregator	No
Amazon Web Services EMEA SARL	B186284	38 avenue John F. Kennedy, L-1855, Luxembourg (Server – Frankfurt – Germany) ,	Serverleie	Yes
Sub-processors to Amazon Web Services EMEA SARL are provided in special terms				
Nasjonal Referansedatabase AS	NO 983195156	St Olavs plass 3, 165, Oslo, NO	Database	No
Visma Software AS	NO 933646920	Karenslyst allé 56, 277, Oslo, NO	Regnskap	No
VISMA FINANCIAL SOLUTIONS AS	NO 984842252	Karenslyst allé 56, 277, Oslo, NO	Regnskap	No
Hurd Økonomi & Regnskap AS	NO 976861213	Biskop Gunnerus' gate 2, 155, Oslo, NO	Regnskap	No
Regnskapsavdelingen Oslo AS	NO 913105664	Bygdøy allé 5, 257, Oslo, NO	Regnskap	No
Statsautorisert Revisor Jon Heger	NO 989947249	Henrik Ibsens gate 60C, , , NO	Regnskap	No
Front Invest DA	NO 983202313	Bygdøy allé 5, 257, Oslo, NO	Nummeropplysning	No
Sub-processors to team.blue Denmark A/S				
PING IT A/S	DK34471967	Vandmanden 24, 9200, Aalborg SV, DK	Erasure of data an decommisioning of hardware	No
T1A Enterprise A/S	DK34471967	Vandmanden 24, 9200 Aalborg SV, Denmark	Outsourced services for IBM spectrum (TSM) backup services	No

Approved sub-processors with special terms

The following sub-processors are used for the processing with the special terms listed:

One Microsoft Way

Redmond

WA 98056

USA

Microsoft Corporation is located in the U.S. and uses the EU-U.S. Data Privacy Framework as a valid basis for transfer, cf. point 8 (Transfer of data to third countries or international organisations), Annex C, point C.6 (Instructions concerning transfer of personal data to third countries) and Annex B, point B.1 (Approved sub-processors).

The data processing agreement with Microsoft Corporation states that Microsoft Corporation is entitled to use and replace additional sub-processors on special terms. These sub-processors are listed in Microsoft's list of sub-processors and can be found here: https://servicetrust.microsoft.com/DocumentPage/aead9e68-1190-4d90-ad93-36418de5c594

Furthermore, it is stated in Microsoft's data processing agreement that a notice period of 6 months is given before any new sub-processors are used. This is done by Microsoft updating the above list and the data controller must do the following to receive notification of this:

1. Go to the homepage: https://servicetrust.microsoft.com/ViewPage/PrivacyDataProtection

2. Find the document titled "Microsoft General – Online Services Subprocessors List"

3. Check the box (☑) next to the title of the document

4. Press "Save to library" above the list of documents

5. Log in to your Microsoft account, in the pop-up window

6. Press "Yes" to receive email notifications

7. Enter your e-mail address and specify how often you want to receive notifications

8. Press "Save"

This procedure replaces, as far as Microsoft's sub-processors are concerned, the one described in Appendix B, point B.2.

Zendesk Inc
1019 Markets street
94103
San Francisco
USA

As Zendesk Inc is located in a third country, the European Commission's Standard Contractual Clauses is used as a valid transfer tool.

The European Commission's Standard Contractual Provisions have thus been entered into by the data processor with Zendesk on behalf of the data controller

The European Commission's Standard Contractual Clauses with Zendesk Inc states that

Zendesk Inc has the right to use and replace additional sub-processors. These processors

appear in Zendesk Inc list of processors and can be found here:

https://support.zendesk.com/hc/en-us/articles/360022185294

It further states that Zendesk Inc will announce 30 days before any new sub-processors are taken into use. This is done by Zendesk Inc updating the list above and the Data Controller must do the following to be notified:

Click on the link above to see the list of sub-processors on the Zendesk website. Click the link "follow" and a login window will appear. From there click the link "Sign up" where name and email address is added. Zendesk will send a confirmation email, from which it will be possible to log in through a validation link. After the login is completed click again on the link "follow" in Zendesk's list of sub-processors, which is linked above.

This procedure replaces, as far as Zendesk Inc sub-processors are concerned, the one described in Appendix B, point B.2.

Twilio (Sendgrid)

75 Beale Street, Suite 300,

San Francisco

04105 USA

As Twilio (Sendgrid) is located in a third country, the European Commission's Standard Contractual Clauses is used as a valid transfer tool.

The European Commission's Standard Contractual Provisions have thus been entered into by the data processor with Twilio (Sendgrid) on behalf of the data controller

The European Commission's Standard Contractual Clauses with Twilio (Sendgrid) states that

Twilio (Sendgrid) has the right to use and replace additional sub-processors. These processors

appear in Twilio (Sendgrid) list of processors and can be found here:

https://www.twilio.com/legal/sub-processors

It further states that Twilio (Sendgrid) will announce 10 days before any new sub-processors are taken into use. This is done by Twilio (Sendgrid) updating the list above and the Data Controller must do the following to be notified:

To subscribe to notifications on changes in sub-processors fill out the information fields on this link: https://www.twilio.com/legal/sub-processors/updates. Insert your company name and email address. Select "Email (SendGrid)" to subscribe to notification of changes in sub-processors and press "submit" at the bottom of the page.

This procedure replaces, as far as Twilio (Sendgrid) sub-processors are concerned, the one described in Appendix B, point B.2.

Amazon Web Services Inc.

410 Terry Avenue North

Seattle

WA 98109-5210

USA

As Amazon Web Services Inc. is located in a third country, the European Commission's Standard Contractual Clauses is used as a valid transfer tool.

The European Commission's Standard Contractual Provisions have thus been entered into by the data processor with Amazon Web Services Inc. on behalf of the data controller.

The European Commission's Standard Contractual Clauses with Amazon Web Services Inc. states that Amazon Web Services Inc. has the right to use and replace additional sub-processors. These processors appear in Amazon Web Services Inc. list of processors and can be found here:

https://aws.amazon.com/compliance/sub-processors/

It further states that Amazon Web Services Inc. will announce 30 days before any new sub-processors are taken into use. This is done by Amazon Web Services Inc. updating the list above and the Data Controller must do the following to be notified:

On the above mentioned "AWS Sub-processors"-page select the link "subscribe for updates" and state the email address the information should be sent to.

This procedure replaces, as far as Amazon Web Services Inc. sub-processors are concerned, the one described in Appendix B, point B.2.

Segment.io Inc.

101 Spear St FL 1

CA 94105-1580

San Francisco

USA

As Segment.io Inc. is located in a third country, the European Commission's Standard Contractual Clauses is used as a valid transfer tool.

The European Commission's Standard Contractual Clauses with Segment.io Inc. states that

Segment.io Inc. has the right to use and replace additional sub-processors. These processors

appear in Segment's list of processors and can be found here:

https://segment.com/legal/subprocessors/

It further states that Segment.io will announce 10 days before any new sub-processors are taken into use. This is done by Segment.io updating the list above and the Personal Data Controller must do the following to be notified:

On the "Subprocessors" page above, select the "subscribe to notifications of sub-processor changes" link at the bottom of the first section. Insert your company name and email address. Select "segment" to subscribe to notification of changes in sub-processors and press "submit" at the bottom of the page.