

CM.com Sub-processors

This document lists the standard sub-processors under the CM.com Terms and Conditions, sub-processors are categorized per business unit (Connect, Engage, Live and Pay) and further specified per service.

Connect & Engage

Conversational AI Cloud:

Entity	Activity	Location	Mechanism
CM.com Affiliates	Support, performance of the Agreement	EU/EEA	DPA
Microsoft Ireland Operations Limited	Azure Hosting/Cloud Services	EU/EEA	DPA
Cloudflare, Inc.	Network security	USA	DPA, Standard contractual clauses

Conversational Channels:

Entity	Activity	Location	Mechanism
CM.com Affiliates	Support, performance of the Agreement	EU/EEA	DPA
Cloudflare, Inc. (Optional Global endpoint, please see: https://developers.cm.com/messaging/docs/integration)	Load balancing & Network security	USA	DPA, Standard contractual clauses

Conversational Router:

Entity	Activity	Location	Mechanism
CM.com Affiliates	Support, performance of the Agreement	EU/EEA	DPA
Google Ireland Ltd.	Cloud hosting and services provider	EU/EEA	DPA

Customer Data Platform:

Entity	Activity	Location	Mechanism
CM.com Affiliates	Support, performance of the Agreement	EU/EEA	DPA
Google Ireland Ltd.	Cloud hosting and services provider	EU/EEA	DPA

HALO:

Entity	Activity	Location	Mechanism
CM.com Affiliates	Support, performance of the Agreement	EU/EEA	DPA
Microsoft Ireland Operations Limited	Azure Hosting/Cloud Services	EU/EEA	DPA
Cloudflare, Inc.	Network security	USA	DPA, Standard contractual clauses
Google Ireland Ltd.	Personal information redaction; Vertex AI Platform	EU/EEA	DPA
Elevenlabs Inc. (Optional)	AI-based text-to-speech services, converting text input into synthesized speech audio for voice output functionalities.	US	DPA EU Standard contractual clauses

**Identity:**

Entity	Activity	Location	Mechanism
CM.com Affiliates	Support, performance of the Agreement	EU/EEA	DPA

Inspire:

Entity	Activity	Location	Mechanism
CM.com Affiliates	Support, performance of the Agreement	EU/EEA	DPA
Microsoft Ireland Operations Limited	Azure Hosting/Cloud Services	EU/EEA	DPA
CYSO B.V.	Cloud Support	EU/EEA	DPA

Mobile Identity:

Entity	Activity	Location	Mechanism
CM.com Affiliates	Support, performance of the Agreement	EU/EEA	DPA
Sekura Mobile Intelligence, Ltd.	Provision of mobile identity services via operator connections	UK	DPA

Mobile Marketing Cloud:

Entity	Activity	Location	Mechanism
CM.com Affiliates	Support, performance of the Agreement	EU/EEA	DPA
(Optional) SendGrid, Inc.	Email delivery (Email Campaigns)	USA	DPA, Standard contractual clauses
(Optional)	Email validation service	USA	DPA, Standard

Hertza L.L.C. (ZeroBounce)			contractual clauses
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Mobile Service Cloud:

Entity	Activity	Location	Mechanism
CM.com Affiliates	Support, performance of the Agreement	EU/EEA	DPA
Microsoft Ireland Operations Limited	Azure Hosting/Cloud Services	EU/EEA	DPA
Wildbit LLC	Inbound email parsing	USA	DPA, Standard contractual clauses
SendGrid, Inc.	Email delivery (Email Campaigns)	USA	DPA, Standard contractual clauses
Fullstory, Inc.	Support, debugging	USA	DPA, Standard contractual clauses
OBI4wan B.V.* *Only for Clients connected before 30 June 2023	Custom channels	The Netherlands	DPA
Surfly B.V.	Co-browse	The Netherlands	DPA
MaxMind, Inc.	Digital mapping	USA	DPA, Standard contractual clauses

Sign:

Entity	Activity	Location	Mechanism
CM.com Affiliates	Support, performance of the Agreement	EU/EEA	DPA
(Optional) Microsoft Ireland Operations Limited	Azure Hosting/Cloud Services	EU/EEA	DPA
(Optional) Google Ireland Ltd.	Cloud storage of signed dossiers.	EU/EEA	DPA

SMS:

Entity	Activity	Location	Mechanism
CM.com Affiliates	Support, performance of the Agreement	EU/EEA	DPA
Cloudflare, Inc. (Optional Global endpoint, please see: https://developers.cm.com/messaging/docs/integration)	Load balancing & Network security	USA	DPA, Standard contractual clauses

Tracedock:

Entity	Activity	Location	Mechanism
CM.com Affiliates	Support, performance of the Agreement	EU/EEA	DPA
Amazon Web Services EMEA SARL	Cloud hosting and Logging	EU/EEA	DPA

Verification as a Service:

Entity	Activity	Location	Mechanism
CM.com Affiliates	Support, performance of the Agreement	EU/EEA	DPA
Subprocessors listed under "Mobile Marketing Cloud" (Optional if email OTP is enabled)	-	-	-

Voice:

Entity	Activity	Location	Mechanism
CM.com Affiliates	Support, performance of the Agreement	EU/EEA	DPA
Cloudflare, Inc. (Optional Global endpoint, please see: https://developers.cm.com/messaging/docs/integration)	Load balancing & Network security	USA	DPA, Standard contractual clauses
(Optional) Microsoft Ireland Operations Limited	Azure AI Services	EU/EEA	DPA
(Optional) Amazon Web Services EMEA SARL	Transcriptions for Voice API services	EU/EEA	DPA
(Optional) Google Ireland Ltd.	Transcriptions for Voice API services	EU/EEA	DPA


 Live

Appmiral:

Entity	Activity	Location	Mechanism
CM.com Affiliates	Support, performance of the Agreement	EU/EEA	DPA
Cloudflare, Inc.	Network security	USA	DPA, Standard contractual clauses
Google Ireland Ltd.	Analytics	EU/EEA	DPA
Datadog, Inc.	Monitoring API traffic	USA	DPA, Standard contractual clauses
Amazon Web Services EMEA SARL	Cloud services	EU/EEA	DPA

CM.com Ticketing Platform:

Entity	Activity	Location	Mechanism
CM.com Affiliates	Support, performance of the Agreement	EU/EEA	DPA
Cloudflare, Inc.	Network security	USA	DPA, Standard contractual clauses
Google Ireland Ltd.	Cloud hosting and services provider	EU/EEA	DPA
SendGrid, Inc.	Email delivery	USA	DPA, Standard contractual clauses

Museums & Parks:

Entity	Activity	Location	Mechanism
CM.com Affiliates	Support, performance of the Agreement	EU/EEA	DPA
Microsoft Ireland Operations Limited	Azure Hosting/Cloud Services	EU/EEA	DPA
Cloudflare, Inc.	Network security	USA	DPA, Standard contractual clauses
SendGrid, Inc.	Email delivery (Email Campaigns)	USA	DPA, Standard contractual clauses
Google Ireland Ltd.	Google Analytics/Hosting & Cloud services	EU/EEA	DPA

Your ticket provider Platform:

Entity	Activity	Location	Mechanism
CM.com Affiliates	Support, performance of the Agreement	EU/EEA	DPA
Microsoft Ireland Operations Limited	Azure Hosting/Cloud Services	EU/EEA	DPA
Cloudflare, Inc.	Network security	USA	DPA, Standard contractual clauses
Amazon Web Services EMEA SARL	Email delivery	EU/EEA	DPA

Pay

Online Payments:

Entity	Activity	Location	Mechanism
CM.com Affiliates	Support, performance of the Agreement	EU/EEA	DPA
Cloudflare, Inc.	Network security	USA	DPA, Standard contractual clauses
Google Ireland Ltd.	Cloud hosting and services provider	EU/EEA	DPA

POS Payments:

Entity	Activity	Location	Mechanism
CM.com Affiliates	Support, performance of the Agreement	EU/EEA	DPA
Google Ireland Ltd.	Cloud hosting and services provider	EU/EEA	DPA

Miscellaneous

Other CM.com Services (if not specified above):

Entity	Activity	Location	Mechanism
CM.com Affiliates	Support, performance of the Agreement	EU/EEA	DPA

For a detailed overview of CM.com Affiliates, please see: <https://www.cm.com/trust-center/privacy/>