Sub-Processor and Supplier List

Proactis Hosted Products

Version:
2.3

Classification:
Public

Date Reviewed:
October 2026

Next Review Date:
October 2027

Table of Contents

1 Document Control 3

1.1 Document Owner 3
1.2 Readership 3
1.3 Version Control 4

2 Introduction 5

3 DotNet products: P2P, S2C, eCat Invoice Capture, ProContract 6

3.1 Sub-processors 6
3.2 Suppliers who are not sub-processors 7

4 TBN, PerfectProcure, WebProcure and PerfectSource 9

4.1 Sub-processors 9
4.2 Suppliers who are not sub-processors 9

5 Proactis P9 10

5.1 Sub-Processors 10
5.2 Suppliers who are not sub-processors 10

6 SAP products: eBuy, eSource 12

6.1 Sub-Processors 12
6.2 Suppliers who are not sub-processors 12

1 Document Control

1.1 Document Owner

This document is owned, approved and maintained by the ***Data Protection Officer*** and is to be reviewed and brought up to date ***every twelve months***.

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1.2 Readership

This document is aimed at the following:

Proactis
Chief Executive Officer
Chief Financial Officer
Chief Information Security Officer
Product Owners
Head of IT Availability Services
Compliance and Quality Officers
General Counsel
Other appropriate Proactis employees
Current or prospective Proactis customers

1.3 Version Control

Document version should start 0.1 and increase numerically from there. When the document is signed off, then the version should be 1.0. Any changes to that document will then be 1.1, 1.2, 1.3 until signed off.

Version	Date	Author	Changes	Status
0.1	29 April 2024	Mark Anderson	Initial draft composition	Draft
1.0	1 May 2024	Mark Anderson	Document authorised for release	Released
1.1	10 May 2024	Mark Anderson	Added CloudFlare to DotNet SubProcessors	Released
1.2	4 June 2024	Mark Anderson	Added Microsoft to DotNet Suppliers for Azure-hosted ML document recognition	Released

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1.3	10 June 2024	Mark Anderson	Reviewed all hosting providers with Head of ITAS	Released
1.4	14 June 2024	Mark Anderson	Various minor changes to improve clarity	Released
1.5	11 July 2024	Mark Anderson	Updated name of Exa to nLighten and added Reporting to Microsoft Azure	Released
1.6	14 November 2024	Mark Anderson	Added optional sub-processor Lexical Labs to DotNet. Added Salesforce and Certinia to the list of suppliers. Added section for SAP products. Moved ComponentSpace from section 3.1 to 3.2 after discussing with product team	Released
1.7	11 December 2024	Mark Anderson	Shortened heading text to improve clarity. Added location for several subprocessors in sections 3.1, 4.1 and 5.1	Released
1.8	14 March 2025	Mark Anderson	Updated description of service provided by Instant Systems in 4.1	Released
1.9	14 April 2025	Mark Anderson	Added optional sub-processor Kaunt to section 3.1	Released
2.0	14 July 2025	Mark Anderson	Amended description of Microsoft Azure in 5.1 to make it clearer. Removed Exa / nLighten from 5.2 following migration to Equinix	Released
2.1	3 September 2025	Mark Anderson	Added Proactis SA to section 5.1. Expanded description of Azure at 5.1 to include Proactis Insights reporting	Released
2.2	22 September 2025	Mark Anderson	Added Touchstone FMS to section 2.1	Released
2.3	14 October 2026	Viresh Sharma	No changes	Released

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2 Introduction

This document provides Proactis customers with information about Sub-Processors in accordance with the Proactis Standard Agreement and the requirements of the GDPR.

Since many customers also wish to know about essential suppliers involved in delivering services to them, this information is also provided to assist those customers..

In some cases, a sub-processor or supplier may not be applicable to a particular customer, depending on the product modules and hosting options which have been chosen. Further information can be obtained from your Account Manager or by emailing **compliance@proactis.com**

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3 DotNet products: P2P, S2C, eCat Invoice Capture, ProContract

3.1 Sub-processors

Company or Product	Purpose
Adobe / AdobeSign	Used in S2C for Sign & Send documents
CloudFlare	Web Application Firewall and DDoS protection. Limited web traffic data is analysed in servers located in the EU and US. For more information: https://www.cloudflare.com/en-gb/trust-hub/gdpr/
Proactis SA	Proactis SA, a French Proactis Group Company, provides additional staff located in Manila for processing of invoices in IC Managed Service and providing customer support services. The staff in Manila are employed directly by Proactis SA
Redcentric PLC	Hosted infrastructure for UK Proactis servers. Redcentric have access to customer IP addresses from their firewalls and other network infrastructure. Access to Proactis systems and customer data is not possible under normal operating conditions but could be granted should the need arise
NexusTek	Hosted infrastructure for US Proactis servers. Nexustek have access to customer IP addresses from their firewalls and other network infrastructure. Access to Proactis systems and customer data is not possible under normal operating conditions but could be granted should the need arise
Amazon Web Services (AWS)	Hosted infrastructure for APAC Proactis servers. AWS have access to customer IP addresses from their firewalls and other network infrastructure. Access to Proactis systems and customer data is not possible under normal operating conditions but could be granted should the need arise
SecurityHQ	Server log monitoring and security alerts. Data residency in SecurityHQ is within the same region as the monitored systems

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Microsoft Azure	MS Azure instances host a Microsoft pre-built document intelligence module which is available to optionally supplement and enhance the existing OCR tool in IC, leading to improved accuracy. Each territory (UK, EU, US) has its own localised Azure instance. The module does not use customer data for further training or any other purpose. Hosting of Reporting databases for customers who have selected this option. Access to Proactis customer data is not possible under normal operating conditions but could be granted should the need arise
Lexical Labs	Optional S2C module: Tiro Contract Review and Intelligence Software analyses contractual documents, allowing customers to easily find potential risks. Documents are processed using custom NLP and AI technologies. The Tiro application is hosted using AWS instances in the UK and passes anonymised contract text to LLMs hosted in the US.
Kaunt A/S	Optional invoice coding module. If selected, Proactis systems will send encrypted data from supplier invoices to Kaunt's system hosted in EU Azure instances. The Kaunt system will return an AIgenerated department code which can be linked to the invoice. Kaunt are designated a sub-processor because where a supplier is a sole trader, the supplier data will be Personal Data.
Touchstone FMS Ltd	Touchstone are a Proactis Parter who provide specialist consultancy around data transfers and inter-operability of data. Engagement is on a percustomer basis as required.

3.2 Suppliers who are not sub-processors

Company or Product	Purpose
Equinix	Hosted rack space for EU Proactis servers. Equinix do not have access to any Proactis customer data
Microsoft SQL Server	Main datastore for P2P, S2C, eCat, TBN. Production, UAT, test, developer databases. Hosted by Proactis so no access to data by Microsoft

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MS Azure DevOps	DevOps ticketing and software factory. Used by Proactis as a Data Controller
Hibernating Rhinos Ltd / RavenDB	Main datastore for InvoiceCapture. Production, UAT, test, developer databases. Hosted by Proactis so no access to data by the supplier
Gurock / Testrail	Test software. Used by Proactis as a Data Controller.
JetBrains / IntelliJ / Teamcity	Dev Env (Teamcity used by P2P). Used by Proactis as a Data Controller.
Browserstack	Test software. Used by Proactis as a Data Controller.
Flexera Software Ltd.	Installshield for P2P
Progress Telerik / Kendo UI	UI Library in P2P, S2C, IC. Hosted by Proactis so no access to data by the supplier
LeadTools	Document viewer for IC, P2P. Hosted by Proactis so no access to data by the supplier
Limilabs	Mail DLL for IC. Hosted by Proactis so no access to data by the supplier
Grapecity / ActiveReports	Reports in P2P. Hosted by Proactis so no access to data by the supplier
Salesforce	CRM and support ticketing system hosted in the EU. Used by Proactis as a Data Controller
Certinia	Salesforce plugin for Professional Services planning. Used by Proactis as a Data Controller
ComponentSpace	IC : SAML for ASP .Net. Hosted by Proactis so no access to data by the supplier

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4 TBN, PerfectProcure, WebProcure and PerfectSource

4.1 Sub-processors

Company or Product	Purpose
Sovos / Trustweaver	TBN : Sign and archive invoices
NexusTek	Hosted infrastructure for US Proactis servers. Nexustek have access to customer IP addresses from their firewalls and other network infrastructure. Access to Proactis systems and customer data is not possible under normal operating conditions but could be granted should the need arise
Proactis SA	Proactis SA, a French Proactis Group Company, provides additional staff located in Manila for providing customer support services. The staff in Manila are employed directly by Proactis SA
Instant Systems Inc	Instant Systems Inc, a company located in Fremont, California, USA provide five developers and one quality analyst for WebProcure product development
SecurityHQ	Server log monitoring and security alerts. Data residency in SecurityHQ is within the same region as the monitored systems
DocuSign	Sign & send contract documents from WebProcure and PerfectProcure

4.2 Suppliers who are not sub-processors

Company or Product	Purpose
Equinix	Hosted rack space for EU Proactis servers (TBN)
TIBCO / Jasper reports	Reporting/transform in PP. Hosted by Proactis so no access to data by the supplier
Software AG / WebMethods	Integration platform for messaging buyers in PP (OSN/TBN) also used by P9/TBN integrations outside NL. Hosted by Proactis so no access to data by the supplier

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OpusCapita INC/ JCat	JCat in PP. Hosted by Proactis so no access to data by the supplier
Ping Identity Corp	PingFederate in PP for SSO. Hosted by Proactis so no access to data by the supplier

5 Proactis P9

5.1 Sub-Processors

Company or Product	Purpose
Amazon Web Services	Gateway for accepting UML invoices and various integration services
Microsoft Azure	Hosting P9 instances for UK and US customers. Hosting of Reporting databases for customers who have selected this option. Each territory (UK, EU, US) has its own localised Azure instance. Proactis Insights Reporting is also hosted in an Azure instance located in Ireland (EU). Microsoft have access to customer IP addresses from their firewalls and other network infrastructure. Access to Proactis systems and customer data is not possible under normal operating conditions but could be granted should the need arise
Proactis SA	Proactis SA, a French Proactis Group Company, provides additional staff located in Manila for customer support services. The staff in Manila are employed directly by Proactis SA
SecurityHQ	Server log monitoring and security alerts. Data residency in SecurityHQ is within the same region as the monitored systems
ValidSign	Sign & send contract documents from P9 for customers who have selected this option. Hosted in the EU.
DocuSign	Sign & send contract documents from P9 for customers who have selected this option. Hosted in the EU.

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Namirial / eSignAnywhere	Sign & send contract documents from P9 for customers who have selected this option. Hosted in the EU.

5.2 Suppliers who are not sub-processors

Company or Product	Purpose
Equinix	Hosted rack space for EU Proactis servers. Equinix do not have access to any Proactis customer data
Oracle	Production, UAT, test, developer databases. Hosted by Proactis so no access to data by Oracle
Alfresco	DMS for Production, UAT, test. Hosted by Proactis so no access to data by Alfresco
MongoDB Atlas	Online datastore for Supplier portal product which handles tokens used for digital signatures.
	Data passed to MongoDB could not be used to identify people at this point. https://www.mongodb.com/legal/dpa
Elastic	Indexed data from Oracle. Hosted by Proactis so no access to data by Elastic
QlikView	Reporting solution. Hosted by Proactis so no access to data by QlikView
jQuery	Included in app: Front-End library hosted by Proactis
Apache licensed frameworks	Included in app and hosted by Proactis
GNU licensed frameworks	Included in app and hosted by Proactis
Atlassian	Ticketing system (Jira) used by Proactis as a Data Controller
Neo4J	Online datastore for Customer master data in Test environment only. If adopted in UAT or Production, will become a Sub-Processor

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6 SAP products: eBuy, eSource

6.1 Sub-Processors

Company or Product	Purpose
SAP France	The platform on which the products are built
Koortis SA, France	Providing support and development for Proactis SAP solutions.
SecurityHQ	Server log monitoring and security alerts. Data residency in SecurityHQ is within the same region as the monitored systems

6.2 Suppliers who are not sub-processors

Company or Product	Purpose
Equinix	Hosted rack space for EU Proactis servers. Equinix do not have access to any Proactis customer data

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