



Sub-Processor List



Data processing – List of sub-processors

Scope

The table below lists Dustin's third-party sub-processors, including Dustin AB and its wholly owned companies ("Subsidiaries") that may process customer personal data under the data processing agreement ("DPA") applicable to Dustin's services (the "Services"). The sub-processors only process personal data for the purpose of delivering the Services Dustin has engaged them to provide. They are not permitted to use any personal data for any other purpose and never for their own purposes. These sub-processors may provide services to one or more Services under the DPA. Each Subsidiary may act as a sub-processor for any Dustin company in relation to any part of the Services.

What is a Sub-processor?

A sub-processor is a third-party data processor engaged by Dustin, including Dustin AB and its Subsidiaries, who have – or potentially will have – access to or process customer data (which may contain personal data). Dustin engages different types of sub-processors to perform various functions.

Dustin owns or controls access to the infrastructure that Dustin uses to host and process general customer and service data submitted to the Services. The table below describes the location and entities engaged by Dustin in the processing of personal data.

Dustin works with certain third parties to provide specific functionality within the Services. In order to provide the relevant functionality, these sub-processors access service data. Their use is limited to the specific service as described in the table below.

Supplier Assessment

Dustin undertakes to use a commercially reasonable selection process by which it evaluates the security, privacy and confidentiality practices of proposed sub-processors that may have access to or otherwise process customer data.

Contractual Safeguards

Dustin requires its sub-processors to satisfy equivalent obligations as those required from Dustin under the DPA, including but not limited to requirements to:

- process personal data in accordance with the data controller's (i.e. the customer's) documented instructions (as communicated in writing to the relevant sub-processor by Dustin).
- use only personnel in connection with their sub-processing activities, who are reliable and subject to a contractually binding obligation to observe data privacy and security to the extent applicable pursuant to applicable data protection laws.
- provide regular training in security and data protection to personnel to whom they grant access to personal data.
- implement and maintain appropriate technical and organizational measures and provide certification that evidences compliance with this obligation.
- promptly inform Dustin about any actual or potential security breach; and
- cooperate with Dustin to manage requests from data controllers, data subjects or data protection authorities, as applicable,

and typically, Standard Contractual Clauses are applied as a legal basis for transfers of personal data to a country outside the EU/EEA, when such legal basis is necessary. To the extent a different transfer mechanism is applied, this will be specifically stated under additional details in the table below.

Security Principles

Dustin's operations are characterized by a number of security principles, with the objective of supporting a sustainable management of personal data. Below are some of these principles:

- we focus on the least privilege principle to limit access to data.
- employees should only have access to the data on a need-to-know basis.
- we implement the principles of data privacy by design and default to ensure data minimization in our designs and when collecting data.
- only necessary data should be collected, processed and stored.
- storage limitation, data anonymization and data deletion where applicable; and

- the security program is used to ensure that adequate security measures are implemented to protect the integrity, availability and confidentiality of data.

Versions

- This sub-processor list has been updated since implementation and the most important changes are listed below.

Version	Major changes since last version
2025:[1]	Skykick has become ConnectWise Ltd. LogMeIn and Team viewer removed from applicable services. Removed from Network as a Service: 3stepIT and De Lage Landen Finans AB. K15t GmbH, Precio Fishbone, Okta Inc, ConnectWise Ltd added under all services, Exclaimer added under Modern Workplace.
2022:[2]	New Service added: Managed Detection and Response. New Sub-processor added to Managed Detection and Response: Truesec Group AB. New Service added: Product Lifecycle Portal along with new agreement category; Product Lifecycle Services Agreement. New subprocessors added to Product Lifecycle Portal: Velory AB and Okta Inc.
2022:[1]	LogMeIn and Team viewer moved from all services to applicable services, Cisco removed from the list, new sub-processors added: Okta, LogicMonitor, CloudBlue, Centro Oy. Updated purpose of processing for Canon se, dk, no. Added new services: Back up as a Service, Storage as a Service, Disaster recovery as a Service, Private cloud Shared, Private cloud Dedicated
2021:[1]	Extensive updates to include more detailed information on sub-processors used, data processed, purpose and transfer mechanism in place. The following headings and information thereunder has been added with this version: Scope, What is a sub-processor, Supplier Assessment, Contractual Safeguards, Security Principles, Data Privacy Program.

All Services¹

Subsidiaries	Location of Sub-processing
Dustin Aktiebolag	Denmark, Finland, Norway, Sweden, Netherlands and Belgium
Dustin A/S	Denmark, Finland, Norway, Sweden, Netherlands and Belgium
Dustin Finland Oy	Denmark, Finland, Norway, Sweden, Netherlands and Belgium
Dustin Norway AS	Denmark, Finland, Norway, Sweden, Netherlands and Belgium
Dustin Sverige AB	Denmark, Finland, Norway, Sweden, Netherlands and Belgium
Inventio.it A/S	Denmark, Finland, Norway, Sweden, Netherlands and Belgium
Dustin Belgium N.V.	Denmark, Finland, Norway, Sweden, Netherlands and Belgium
Dustin Netherlands B.V.	Denmark, Finland, Norway, Sweden, Netherlands and Belgium
Dustin NL B.V.	Denmark, Finland, Norway, Sweden, Netherlands and Belgium

¹ All Services means any and all services provided by Dustin, whether or not specifically listed below.

Sub-processor	Purpose of Processing	Personal Data Processed	Location of Sub-processing	Additional Details
Microsoft Corporation	End user support, ticketing and invoicing, on the Azure cloud platform	Customer data handled in the service	Netherlands and Ireland	https://www.microsoft.com/en-gb/trust-center/privacy/gdpr-overview https://privacy.microsoft.com/en-US/
Tele2 Sverige AB	End user support through Genesys cloud and customer care services	Customer Data provided as part of the Service	EU (Frankfurt)	
Atlassian Pty Ltd.	End user support through Confluence	Name, e-mail address and phone number, as well as technical documentation related to applicable services provided to the customer e.g. documentation of device information such as IP addresses and device names	Australia, Brazil, Germany, India, Japan, Malaysia, Mexico, Netherlands, New Zealand, Philippines, Poland, Turkey, Ukraine, United Kingdom, United States.	https://www.atlassian.com/legal/privacy-policy#what-this-policy-covers
K15t GmbH	Adjust confluence pages to Dustin Layout	Name, e-mail address and phone number, as well as technical documentation related to applicable services provided to the customer e.g. documentation of device information such as IP addresses and device names	EU	https://www.k15t.com/legal/privacy-statement
Okta, Inc.	Single Sign On solution for Skyportal	First and last name, Business contact information (company, email, phone, physical business address), Personal contact information (email, cell phone), Title, Position, ID data such as mobile ID, Professional life data, Personal life data (in the form of security questions and answers), Connection data such as IP-address and localization data	USA, Romania, Canada and Australia	https://www.okta.com/uk/privacy-policy/ Transfer of personal data to Canada is based on an adequacy decision.
Precio Fishbone AB	Consultancy including productivity, workshops, and assessments	Access to customer environment to provide the contracted services	Within the customer environment	Privacy Policy and Cookies

ConnectWise Ltd	Provider of services for managing customer support, projects and billing.	Name, e-mail address and phone number, device information and any type of information submitted by the customer in support tickets.	Ireland	Privacy Policy How You're Protected
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Services with managed services agreement				
Modern workplace				
Sub-processor	Purpose of Processing	Personal Data Processed	Location of Sub-processing	Additional Details
Microsoft Corporation	Service provider of Office 365 cloud solutions	Decided by the customer	Decided by the customer tenant location	Subscription-based licensing. https://www.microsoft.com/en-gb/trust-center/privacy/gdpr-overview https://privacy.microsoft.com/en-US/
Cloudblue LLC	Provider of self-service portal for software licenses (Dustin Marketplace)	Name, e-mail address and phone number	Spain, Netherlands, Canada and USA	https://www.cloudblue.com/security-statement/ Transfer of personal data to Canada is based on an adequacy decision.
Centero Oy	Service for updating applications regularly	Name, e-mail address	Ireland, Sweden, Finland	https://preview.portal.centero.fi/Home/Policies/Privacy?layout=static
FastTrack Software ApS	Service to elevate end-users' administrative privileges on devices	Portal user (administrator) name, email address and phone number (phone number mandatory only with two factor authentication)	Microsoft Azure is used. The Data Processor only uses datacenters located within the continent of where the processing takes place	https://www.adminbyrequest.com/Privacy Data Processing Agreement (adminbyrequest.com)
Exclaimer Ltd.	Provide automatic email signature	Name, email address, address	EU	

Azure Services				
Sub-processor	Purpose of Processing	Personal Data Processed	Location of Sub-processing	Additional Details
Microsoft Corporation	Provider of Azure Consumption for managing service consumption, including cost management and support escalation	Decided by the customer	Decided by the customer	https://www.microsoft.com/en-gb/trust-center/privacy/gdpr-overview https://privacy.microsoft.com/en-US/
Microsoft Corporation	Provider of Azure Operate, which is a managed service for Azure workloads	Decided by the customer	Decided by the customer	https://www.microsoft.com/en-gb/trust-center/privacy/gdpr-overview https://privacy.microsoft.com/en-US/
LogicMonitor, Inc	Network monitoring to all hosting services	Incidental Personal Data elements processed may include name, email address, mobile device number, and workstation IP address, upon the instruction of the Customer	USA and United Kingdom	https://www.logicmonitor.com/data-handling-supplement https://www.logicmonitor.com/privacy/policy

Document Management Service				
Sub-processor	Purpose of Processing	Personal Data Processed	Location of Sub-processing	Additional Details
Canon Svenska AB	Provider of hardware, support, secure print and a monitoring tool for managing the print environment in real time	Contact details, IP-address and picture	Sweden, Ireland, France and Netherlands	https://www.canon-europe.com/privacy-policy/
Canon Denmark A/S	Provider of hardware, support, secure print and a monitoring tool for managing the print environment in real time	Contact details, IP-address and picture	Denmark, Ireland, France and Netherlands	https://www.canon-europe.com/privacy-policy/
Canon Norway AS	Provider of hardware, support, secure print and a monitoring tool for managing the print environment in real time	Contact details, IP-address and picture	Norway, Ireland, France and Netherlands	https://www.canon-europe.com/privacy-policy/
Canon Nederland NV	Provider of hardware, support, secure print and a monitoring tool for managing the print environment in real time	Contact details, IP-address and picture	Norway, Ireland, France and Netherlands	https://www.canon-europe.com/privacy-policy/
Netprint Solution Göteborg AB	Provider of cloud-based secured print	E-mail address	Denmark, Finland, Iceland, Norway and Sweden as well as UK, USA and Australia.	https://www.netprint.se/en/privacy-policy/
3 Step IT Group Oy	Provider of IT asset financing and management	Business contact details	Sweden	https://www.3stepit.com/privacy-policy
Scrive	Esignature tool	Contact details, IP-address,	EU/EEA	

Network as a Service				
Sub-processor	Purpose of Processing	Personal Data Processed	Location of Sub-processing	Additional Details
LogicMonitor, Inc	Network monitoring for Network as a Service	Incidental Personal Data elements processed may include name, email address, mobile device number, and workstation IP address, upon the instruction of the Customer	USA and United Kingdom	https://www.logicmonitor.com/data-handling-supplement https://www.logicmonitor.com/privacy/policy

Private Cloud Shared				
Sub-processor	Purpose of Processing	Personal Data Processed	Location of Sub-processing	Additional Details
LogicMonitor, Inc	Network monitoring to all hosting services	Incidental Personal Data elements processed may include name, email address, mobile device number, and workstation IP address, upon the instruction of the Customer	USA and United Kingdom	https://www.logicmonitor.com/data-handling-supplement https://www.logicmonitor.com/privacy/policy

Private Cloud Dedicated				
Sub-processor	Purpose of Processing	Personal Data Processed	Location of Sub-processing	Additional Details
LogicMonitor, Inc	Network monitoring to all hosting services	Incidental Personal Data elements processed may include name, email address, mobile device number, and workstation IP address, upon the instruction of the Customer	USA and United Kingdom	https://www.logicmonitor.com/data-handling-supplement https://www.logicmonitor.com/privacy/policy

Backup as a Service				
Sub-processor	Purpose of Processing	Personal Data Processed	Location of Sub-processing	Additional Details
LogicMonitor, Inc	Network monitoring to all hosting services	Incidental Personal Data elements processed may include name, email address, mobile device number, and workstation IP address, upon the instruction of the Customer	USA and United Kingdom	https://www.logicmonitor.com/data-handling-supplement https://www.logicmonitor.com/privacy/policy

Disaster Recovery as a Service				
Sub-processor	Purpose of Processing	Personal Data Processed	Location of Sub-processing	Additional Details
LogicMonitor, Inc	Network monitoring to all hosting services	Incidental Personal Data elements processed may include name, email address, mobile device number, and workstation IP address, upon the instruction of the Customer	USA and United Kingdom	https://www.logicmonitor.com/data-handling-supplement https://www.logicmonitor.com/privacy/policy

Storage as a Service				
Sub-processor	Purpose of Processing	Personal Data Processed	Location of Sub-processing	Additional Details
LogicMonitor, Inc	Network monitoring to all hosting services	Incidental Personal Data elements processed may include name, email address, mobile device number, and workstation IP address, upon the instruction of the Customer	USA and United Kingdom	https://www.logicmonitor.com/data-handling-supplement https://www.logicmonitor.com/privacy/policy

Managed Detection and Response				
Sub-processor	Purpose of Processing	Personal Data Processed	Location of Sub-processing	Additional Details
Truesec Group AB	Provider of detection and response solution.	First and last name, Business contact information (company, email, phone, physical business address). Connection data such as IP-address. Localization data. Domain. User data such as login credentials, device ID, traffic volumes and patterns and behaviour and/or preferences. As well as any other personal data sent through the Service, hosted on servers, storage and backup as well as on local computers – all as determined by the customer. The customer may submit special categories of data to the Service, the extent of which is determined and controlled by the customer in its sole discretion, and which may include Personal Data concerning health information.	Sweden and Netherlands	https://www.truesec.com/privacy-and-terms

Services with Product Lifecycle Services Agreement				
Product Lifecycle Portal				
Sub-processor	Purpose of Processing	Personal Data Processed	Location of Sub-processing	Additional Details
Velory AB	Provider of Product Lifecycle Portal.	First and last name, Business contact information (company, email, phone, work title, physical business address). IP-address and Localization data. User data such as login credentials, user no, device ID, traffic volumes and patterns. As well as any other personal data sent through the Service, hosted on servers, storage and backup as well as on local computers – all as determined by the customer. The customer may submit other categories of data to the Service such as photos, the extent of which is determined and controlled by the customer in its sole discretion.	Poland, Germany, Ireland, Netherlands, Sweden, Israel, France and USA	https://www.velory.com/privacy-policy

Services with online terms				
Easy Workplace				
Sub-processor	Purpose of Processing	Personal Data Processed	Location of Sub-processing	Additional Details
Microsoft Corporation	Provider of subscription-based licensing on the Azure cloud platform	Decided by the customer	Decided by the customer tenant location	https://www.microsoft.com/en-gb/trust-center/privacy/gdpr-overview https://privacy.microsoft.com/en-US/
Cloudblue LLC	Provider of self-service portal for software licenses (Dustin Marketplace)	Name, e-mail address and phone number	Spain, Netherlands, Canada and USA	https://www.cloudblue.com/security-statement/ Transfer of personal data to Canada is based on an adequacy decision.
ConnectWise Ltd	Provider of cloud backup solution for Office 365	Name and e-mail address	USA, United Kingdom, Ireland and Netherlands	Privacy Policy How You're Protected
3 Step IT Group Oy	Provider of IT asset financing and management	Business contact details	Sweden	https://www.3stepit.com/privacy-policy
Inrego Holding AB	Provider of IT asset disposition services	Business contact details	Sweden	https://inrego.se/cookies/

License Management (Dustin Appmarket / Marketplace)				
Sub-processor	Purpose of Processing	Personal Data Processed	Location of Sub-processing	Additional Details
Microsoft Corporation	Provider of subscription-based licensing on the Azure cloud platform	Decided by the customer	Decided by the customer tenant location	https://www.microsoft.com/en-gb/trust-center/privacy/gdpr-overview https://privacy.microsoft.com/en-US/
Cloudblue LLC	Provider of self-service portal for software licenses (Dustin Marketplace)	Name, e-mail address and phone number	Spain, Netherlands, Canada and USA	https://www.cloudblue.com/security-statement/ Transfer of personal data to Canada is based on an adequacy decision.
ConnectWise Ltd	Provider of cloud backup solution for Office 365	Name and e-mail address	USA, United Kingdom, Ireland and Netherlands	Privacy Policy How You're Protected

Learning HUB				
Sub-processor	Purpose of Processing	Personal Data Processed	Location of Sub-processing	Additional Details
Lexicon Interactive AB	Provider of education platform for IT training	Name and e-mail address	Denmark and Netherlands	https://www.lexicon.se/Personuppgiftspolicy/

Consultant firms having access to Dustin systems				
Sub-processor	Purpose of Processing	Personal Data Processed	Location of Sub-processing	Additional Details
Innosoft AB	Provider of consultancy services in connection with ConnectWise development work	Access to ConnectWise under Dustin supervision when working on a system support request from Dustin	Sweden and UK	

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NOTE: This document is subject to change at any time. Last update 20 March 2025.