



# CLOUD ACADEMY DATA SUMMARY

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Date of Issue: November 2023

# Version Control

Revision History			
Version	Issue Date	Author	Description of Change
1.2	28/11/2023	Carrie Kimble	Further updates - Daily and removed LinkedIn
1.1	22/11/2023	Carrie Kimble	Update to reflect changes in WFL Data Processing & Sharing Agreement
1.0	21/03/2023	Carrie Kimble	Initial document release
0.5	20/03/2023	Carrie Kimble	Release for comments

Document Approval		
Name	Position	Viewed / Comments
DJ Black	InfoSec & Governance Manager	Reviewed and Approved



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# 1 Introduction

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This document describes the Cloud Academy and third-party systems used within the Cloud Academy cloud-based online learning platform (Cloudacademy.com).

It gives an overview of the systems and services used within the Cloud Academy learning platform as well as the data processed by their third parties.

The tables included herein detail the description, service model, data locations, security and data privacy considerations.

## 2 Core Systems and Learning Delivery

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### 2.1 Core Systems

Cloud Academy provides a SaaS platform from within Amazon Web Services (AWS), located within the US-WEST2 region (Oregon).

Cloud Academy are certified to Cyber Essentials Plus and ISO27001.

### 2.2 Cloud Learning Platform

The systems used within the portal provide an enterprise class cloud hosted learning platform.

In addition to the core services provided by Cloud Academy, the cloud-based delivery includes a number of third-party service components.

The delivery platforms used are detailed within section 4 of this document.

### 2.3 Third Party Suppliers and Systems

The third parties that provide services within the Cloud Academy learning portal provide software or components that enables Cloud Academy to extend the features of the SaaS portal. In this regard, such third parties typically act as Data Processors downstream from Cloud Academy.

Cloud Academy has contracts and Agreements in place with relevant sub-processors to ensure that data protection responsibilities for data sub-processors are secure within our supply chain.

Where Cloud Academy needs to transfer personal data outside of the US, contracts between Cloud Academy and its suppliers include the use of EU Standard Contractual Clauses (SCC) and UK International Data Transfer Agreement (IDTA) Addendums to ensure the requirements of the General Data Protection Regulation (GDPR) and the UK Data Protection Act (DPA) are met.

Please note that third parties are used to provide specific portal functionality and not every customer's data will be processed by all third parties. Please refer to the [Cloud Academy Privacy Notice](#) for more details.

The geographic location the third parties process data as well as certifications they hold are detailed within the tables in the following sections.

The third-party services are not within the scope of Cloud Academy's ISO27001 and Cyber Essentials certification.

## 3 Corporate / Delivery Platforms

System	Corporate	Portal	Provider / Host	Description	Service Model	Certification	Data Location	Legal Safeguard
6 sense	X	X	6 sense	Account engagement platform	Cloud		USA	DPAs / SCCs
Adobe	X		Adobe	Electronic signature	Cloud	ISO27001	EEA - AWS Ireland & Germany	Adequacy decision
Algolia		X		Imported data search engine for contents of portal	Cloud	ISO27001	USA	SCC
Alibaba Cloud		X	Alibaba	Hosting platform only, no personal data shared with this supplier.	Cloud		China	N/A as no personal data shared with supplier.
Auth0		X	Auth0	Authentication	Cloud	ISO27001, ISO27018, AICPA 3 <sup>rd</sup> party SOC 2 Type 2, Gold CSA level 2 (cloud security), PCI DSS	USA	SCC
AWS	X	X	AWS	Main IaaS for Portal	IaaS	ISO27001, ISO27018	USA	SCC
Bitly	X		Bitly	Shorten URLs, track analytics	Cloud		USA	SCC
Calendly	X	X	Calendly	Calendar availability, scheduling, interactions with business customers & support onboarding to platform	Cloud		USA	SCC
Chartmogul		X	Chartmogul	Managing analytics and metric reporting	Cloud		USA, Germany	SCC
Churnzero		X	Churnzero	Customer Success Management: communications to individuals, product usage data	Cloud	AICPA SOC 2 Type 2	USA	SCC

System	Corporate	Portal	Provider / Host	Description	Service Model	Certification	Data Location	Legal Safeguard
Cloudingo (via Salesforce)	X		Symphonic Source Company	Account converter in Salesforce	Cloud	Salesforce ISV, SOC 2 Type II	USA	
Cube.dev		X	Deployed through AWS, Google GCP and Azure	Creation of dashboards and reporting	Cloud	AICPA: SOC 2 Type 1 & 2, HIPAA	USA	SCC
Daily	X	X	Daily.co	WebRTC	Cloud	SOC 2 Type 2, EU-US and Swiss-US Data Privacy Framework Program, GDPR and HIPAA compliant	USA	SCC
Datadog		X	Datadog	Monitoring system	Cloud	ISO27001, HIPAA, SOC 2 Type I & II,	USA	SCC
Egress Software	X		Egress Software Technologies Ltd	Email security, breach prevention and secure data sharing	Cloud	ISO27001, CyberEssentialsPlus and SOC 2.	Azure, UK	Adequacy decision
Filestack		X	Hosted on AWS, owned by Idera, Inc	Manages upload/download on the Platform of customer's contents and resources.	Cloud		USA (N. Virginia)	SCC
GoTo	X	X	LogMeIn, Inc	Platform used to host Webinars with several participants, including customers and prospects (used by both Marketing as well as customer services)	Cloud	Certain products and / or suite-specific: SOC 2 Type II, BSI, C5, SOC 3, ISO27001 TBC	USA	
G2.com		X	G2	Collecting reviews on CA platform	Cloud		USA	SCC
Google (Ads, backups)	X	X	Google	Analytics, Advertising, TagManager, Remarketing, Matched Audience Lists, Youtube,	Cloud	ISO27001	USA & other global locations	Adequacy decision, SCC

System	Corporate	Portal	Provider / Host	Description	Service Model	Certification	Data Location	Legal Safeguard
				Conversion tracking (Digital advertising, retargeting, tracking and reconciliation of conversions). IdP Authentication, reCAPTCHA, Backups, Portal Laboratories.				
Google (Cloud Platform)	X	X	Google	A serverless execution environment for building and connecting cloud services.	Cloud	ISO27001	USA	Adequacy decision, SCC
Hootsuite		X	Hootsuite	Platform used to schedule organic social media posts.	Cloud	AICPA SOC 2 Type II, Cyber Essentials, FedRAMP NIST SP 800-53	Canada	Adequacy
Hotjar	X	X	Hotjar	Platform to support surveys, Heat Maps, conversions.	Cloud		USA, Malta	SCC
Hubspot	X		Hubspot	Marketing Automation: emails to individuals and customers; Landing pages, Campaign flows (connected with Salesforce)	SaaS	AICPA SOC 2 Type II and SOC 3	USA East Region or AWS in Germany	SCC, UK Addendum
KeepIt	X		KeepIt	Backup up service -Office 365	Cloud	ISO27001	USA, Europe (Germany, Denmark, UK).	Adequacy decision for Swiss/UK transfers & SCCs for USA
Launchdarkly .com		X	Catamorphic, Co.	Used to manage selective deployment of new feature.	Cloud	ISO27001, ISO17021, SOC 2 Type II, FedRAMP Moderate authorisation	USA	SCC
Meta	X	X	Meta Platforms , Inc	Authentication, pixel, Remarketing, Analytics, Lookalike	Cloud	ISO27001	Ireland, USA	SCC

System	Corporate	Portal	Provider / Host	Description	Service Model	Certification	Data Location	Legal Safeguard
				Audience, Matched Audience Lists				
Microsoft Azure (Labs)	X		Microsoft	Suite of office tools	Cloud	ISO27001	UK	Adequacy decision
Microsoft 365/ Azure		X	Microsoft	Used to provide Lab environments to customers.	Cloud	ISO27001	USA	
MixPanel	X		MixPanel	Business intelligence	Cloud	Native SOC 2 Type II attestation, Cloud Star Alliance (CSA) Star Level 1	USA, Netherlands	SCC
Outreach		X	Outreach	Marketing and emailing system	Cloud	ISO27001	USA	SCC
Palo Alto	X	X	PwC	Managed Cyber defence threat management & EDR service	SaaS Managed	ISO27001, CyberEssentialsPlus	Google Cloud Platform	Adequacy decision
Pendo		X		Customer feedback, sentiment analytics, improve customer experience.	Cloud		USA	
Quick Books	X		Intuit	Finance system	Cloud	QuickBooks Online Database is ISO/IEC 27001:2013 certified.  QuickBooks Online is assessed annually for PCI DSS compliance and is listed on the Visa Registry of Global Service Providers.	USA	SCC
Quora	X		Quora	Retargeting, pixel, analytics, Lookalike Audience, Matched Audience Lists	Cloud		USA	SCC



System	Corporate	Portal	Provider / Host	Description	Service Model	Certification	Data Location	Legal Safeguard
Recurly.com		X	Recurly, Inc	Subscription management	Cloud	PCI-DSS Level 1, compliant, a Visa Global Registry Service Provider	USA	SCC
Refract	X	X	Allego	Service to record conference calls with customers	Cloud	TBC	USA	SCC
Rollbar	X	X		Defect identification	SaaS	ISO27001	USA	SCC
Rustici	X	X	LTG	eLearning platform	Cloud	ISO27001	USA	SCC
Salesforce	X		Salesforce	Customer relationship and service management system Communications to individuals	Cloud	ISO27001	USA	SCC
Sostenuto (Sunrise Software)	X		Sunrise Software Ltd	Complete view of customer interactions and tracking through ticketing system	SaaS	ISO27001, IT-Health CHECK	UK	Adequacy decision
Stackadapt		X	Stackadapt	Podcast, pixel, Analytics	Cloud		USA	SCC
Stitchdata.com		X	Talend	ETL - to integrate salesforce/hubspot in AWS DWH - no storage, but transport.	Cloud	SOC 2, HIPAA compliant	USA	
StreamNative.io		X	Pulsar	Messaging & streaming service	Cloud	SOC 2 Type II, HIPAA compliant	USA	SCC
Stripe.com		X	Stripe.com	Payment processing platform	Cloud	ISO27001, PCI Level -1	USA & Ireland	SCC
Tackle.io		X	Tackle.io	Provides AWS Marketplace integration.	Cloud	TBC	USA	SCC
Twilio Sendgrid		X	Twilio	Transactional emails, Customer engagement platform.	Cloud	ISO27001, SOC 2 attestation	USA	SCC

System	Corporate	Portal	Provider / Host	Description	Service Model	Certification	Data Location	Legal Safeguard
X (formerly Twitter)		X	X Holdings, Inc	Social media & networking service, Retargeting, pixel, analytics, Lookalike Audience.	Cloud	ISO27001	USA, Ireland & other countries	SCC
Usersnap		X	Usersnap	Tool to gather customer feedback to Technical Support team.	Cloud		EEA	
Workspan		X	Workspan	Application provider.	Cloud	SOC 2 Type II	USA	SCC
Zapier		X	Zapier, Inc	Integration among cloud services.	Cloud	SOC 2 Type II, SOC 3	USA	SCC
Zendesk		X	Zendesk	Helpdesk: communications to individuals.	Cloud	ISO27701, ISO27701, AIPCA	USA	SCC
Zoom	X		Zoom Video Comms	Conference call with customers.	SaaS	ISO27001	USA	SCC

## 4 Model Data Processing / Sharing Agreement

Below are details on Data Sharing and Data Processing agreements for the management of data transacted between the Supplier and its customers.

The third parties listed are the core set expected to be used within service delivery, however, there may be other third parties introduced depending on the nature of the services requested by the customer and within the management of delivery by Supplier. These additional third parties will be specified within the order.

<b>Data Controller/Processor</b>	Supplier will act as a Data Processor with the customer being the Data Controller.			
<b>Subject matter and Purpose of data processing</b>	Management and provision of content delivery platform (the Portal) including skills assessment, examination, certification and marketing related activity.			
<b>Nature of the processing</b>	The processing of Personal Data is required for the provision of the agreed services, which may include the collection, recording, organisation, structuring, storage, adaptation, or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction of data as described herein. Data may be used for marketing purposes where consent or other lawful basis has been confirmed.			
<b>Categories of data subjects</b>	Employees and/or representatives of the client.			
<b>Type of personal data processed</b>	<ul style="list-style-type: none"> <li>- First name</li> <li>- Last name</li> <li>- Email</li> <li>- Photo</li> <li>- IP address (Geo-location data)</li> <li>- Marketing related data</li> </ul>	<ul style="list-style-type: none"> <li>- Company</li> <li>- Country</li> <li>- Member since</li> <li>- Time zone</li> <li>- Activity logs</li> <li>- Consents</li> <li>- License related data</li> </ul>	<ul style="list-style-type: none"> <li>- Personal website</li> <li>- LinkedIn profile</li> <li>- Study plan</li> <li>- Exam details</li> <li>- Password(s)</li> <li>- Attainment</li> <li>- Complaints</li> </ul>	<ul style="list-style-type: none"> <li>- Hands on lab</li> <li>- Quizzes</li> <li>- Skills growth</li> <li>- Activities</li> <li>- Enquiries</li> <li>- Preferences</li> </ul>
<b>Special category data (Sensitive data)</b>	None Processed			
<b>Duration of processing (Data Retention)</b>	Duration is term of contract plus appropriate retention periods to meet legal and regulatory requirements.			
<b>Description of technical and organisational controls</b>	<ul style="list-style-type: none"> <li>• CIA Objectives - Confidentiality, Integrity, Availability</li> <li>• Information Ownership and Custodianship - Internal Governance</li> <li>• Information Risk Management</li> <li>• Privacy Compliance</li> <li>• Minimization and Limitation of Information Quantity</li> <li>• Data and Information Retention</li> <li>• Compliance with Privacy, Laws, Regulations, Customer Agreements</li> <li>• Management Oversight</li> <li>• Human Resources Security</li> <li>• Information Classification</li> <li>• Information Handling</li> </ul>			
<b>Return or Destruction of the Personal Data</b>	Data will be destroyed in line with legal and contractual requirements. Customers can discuss any requirement for Supplier to return data at the end of contracted period.			
<b>Subprocessors &amp; Onward</b>	6 sense	United States	Microsoft Azure (Labs)	United States
	Adobe	EEA (Ireland, Germany)	Microsoft Office365 / Azure	UK
	Algolia	United States	MixPanel	United States
	Alibaba Cloud	China	Outreach	United States
	Auth0	United States	PaloAlto (PwC)	UK
	AWS	United States	Pendo	United States
	Bitly	United States	Quora	Ireland/United States
	Calendly	United States	Quickbooks	United States
	Chartmogul	United States	Recurly.com	United States
	Churnzero	United States	Refract	United States
	Cloudingo (via Salesforce)	United States	Rollbar Inc	United States
	Cube.dev	United States	rusticsoftware.com	United States
	Daily	United States	Salesforce.com	United States
	Datadog	United States	Sostenuto	UK
	Egress Software	UK	Stackadapt	United States
	Meta	Ireland/United States	Stitchdata.com	United States
	Filestack	United States	StreamNative.io	United States
	g2.com	United States	Stripe.com	United States
	Google (Ads, Backups)	United States	Tackle.io	United States
	Google (GCP)	United States	Twilio Sendgrid	United States
	GoTo	United States	Usersnap	United States
	Hootsuite	Canada	WorkSpan	United States
	Hotjar	United States	Zapier, Inc.	United States
	Hubspot	United States	X (formerly Twitter)	United States
	KeepIt	UK	Zendesk	United States
	LaunchDarkly.com	United States	Zoom	United States
<b>Data Processing Locations</b>	CA have staff within the United States, UK, EEA, Philippines, Australia, New Zealand, Indonesia, Brazil, Canada, and the Turks and Caicos Islands who potentially may be required to access customer data. Primary vendor data locations are noted in the Subprocessor section above. Please refer to CA's privacy notice ( <a href="https://cloudacademy.com/privacy/">https://cloudacademy.com/privacy/</a> ) for details of its processing.			

