

VehicleVision<sup>®</sup>

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**Subprocessors and  
third party integrations**

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Vehicle Vision International Limited (“Vehicle Vision”) uses certain subprocessors (including its subsidiaries and third parties) to assist in providing the Vehicle Vision “Software” as described in the [End User Licence Agreement \(EULA\)](#).

In addition, Vehicle Vision has specific system integrations with certain third party software providers to increase productivity, visibility of data and automation of tasks for Vehicle Vision Software Customers.

## What is a subprocessor?

A subprocessor is a third party data processor engaged by Vehicle Vision, including its subsidiaries, who has or potentially will have access to or process data (which may contain personal data). Vehicle Vision engages different types of subprocessors to perform various functions as explained in the tables below.

## Subprocessor due diligence

Vehicle Vision undertakes to use a commercially reasonable selection process by which it evaluates the security, privacy and confidentiality practices of proposed subprocessors that will or may have access to or process data.

## Subprocessor safeguards

Vehicle Vision requires its subprocessors to satisfy equivalent obligations to those which Vehicle Vision (as a data processor) is required by data controllers to comply with pursuant to written agreements, which include, but are not limited to, the following requirements:

- Process personal data in accordance with the data controller’s (i.e. the Vehicle Vision Customer) instructions from time to time;
- In connection with their subprocessing activities, ensure that all personnel who have access to and /or process personal data, observe data privacy and security, to the extent applicable, pursuant to applicable data protection laws;
- Implement and maintain appropriate technical and organisational measures (including measures consistent with those to which Vehicle Vision is contractually committed to adhere insofar as they are equally relevant to the subprocessor’s processing of personal data on Vehicle Vision’s behalf);
- Promptly inform Vehicle Vision without undue delay on becoming aware of any personal data breach;
- Cooperate with Vehicle Vision in order to deal with requests from data controllers, data subjects or data protection authorities, as applicable.

## Infrastructure subprocessors – data storage

Currently, the Vehicle Vision production systems for the Software are located within facilities in the Europe and Japan. The following table describes the countries and legal entities engaged in the storage of Vehicle Vision data. Vehicle Vision also uses additional services provided by these subprocessors to process data as needed to provide the Software.

Entity name	Entity type	Entity country	Data centre
Amazon Web Services EMEA SARL (AWS Europe)	Hosting provider	Luxembourg	Ireland
Amazon Web Services Japan G.K.	Hosting provider	Japan	Japan (Tokyo)

## Service specific subprocessors

Vehicle Vision works with certain third parties to provide specific functionality within the Software. These providers are the subprocessors set forth below. In order to provide the relevant functionality these subprocessors may have access to or process data. Their use is limited to the indicated services.

Entity name	Purpose	Entity country
AI Cross Inc.	<p>AI Cross is a business communication platform company that provides messaging services and APIs which Vehicle Vision utilises to send SMS communications to the 'end customer' as part of the send process within the Vehicle Vision Software.</p> <p>AI Cross has access to 'end customer' mobile phone numbers and as appropriate, short url web links to customer web pages, as needed for the purpose of sending SMS notifications. This information is only passed through to AI Cross when a user of the Vehicle Vision Software, wishes to send SMS communication to the 'end customer'.</p>	Japan
Google LLC (Firebase)	<p>Firebase (from Google LLC) is a platform that Vehicle Vision uses to capture crash reporting and usage analytics from the Vehicle Vision native mobile apps (used by Vehicle Vision Software users, not the 'end customer'). This allows Vehicle Vision to gain a better understanding of our native mobile app performance. The analytics and insight gained is used to improve the service and performance of our native mobile apps.</p> <p>Firebase has limited access to information in relation to usage of the Vehicle Vision native mobile apps. This includes; device type; operating system; device memory; session activity; detailed information on crash source; and potentially; IP address; Android ID; organization identifier (name of business); and user identifier to assist with crash reporting.</p>	United States
Mailgun Technologies, Inc.	<p>Mailgun is an email delivery platform that provides an SMTP service to send and receive email. Vehicle Vision utilises this SMTP service to send email communications to the 'end customer' and Vehicle Vision Software users as part of the send and notification process within the Vehicle Vision Software.</p> <p>Mailgun has access to the metadata of a message, which includes the sender, recipient(s), subject line, originating IP address and the bodies of messages. This information is only passed through to Mailgun when an email communication is sent to the 'end customer' or there is an event update that requires a notification email.</p>	United States
Twilio, Inc.	<p>Twilio is a cloud communications platform that provides APIs which Vehicle Vision utilises to send programmable SMS communications to the 'end customer' as part of the send process within the Vehicle Vision Software.</p> <p>Twilio has access to 'end customer' mobile phone numbers and as appropriate, short url web links to customer web pages, as needed for the purpose of sending SMS notifications. This information is only passed through to Twilio when a user of the Vehicle Vision Software, wishes to send SMS communications to the 'end customer'.</p>	United States

Entity name	Purpose	Entity country
TxtLocal Limited	<p>TxtLocal is a mobile communications company that provides APIs which Vehicle Vision utilises to send SMS communications to the 'end customer' as part of the send process within the Vehicle Vision Software.</p> <p>TxtLocal has access to 'end customer' mobile phone numbers and as appropriate, short url web links to customer web pages, as needed for the purpose of sending SMS notifications. This information is only passed through to TxtLocal when a user of the Vehicle Vision Software, wishes to send SMS communication to the 'end customer'.</p>	United Kingdom
Zendesk, Inc.	<p>Zendesk is a customer service platform that Vehicle Vision utilises primarily for the Vehicle Vision technical support ticketing system.</p> <p>Zendesk APIs are utilised (as appropriate) to provide an integration where submitted technical support enquiries to Vehicle Vision are automatically added to Zendesk and assigned a ticket reference number. Enquiries are then subsequently managed within the Zendesk platform allowing for quicker resolution and tracking of support of tickets.</p> <p>Zendesk stores limited information in relation to submitted technical support enquiries from Vehicle Vision Software users (not the 'end customer'). This includes name, email address and potentially, phone number and organisation (name of business) if provided by the Vehicle Vision Software user. Furthermore, 'end customer' information may be stored within a particular ticket if included in the description of the enquiry submitted by the Vehicle Vision Software user.</p>	United States

## Vehicle Vision International subsidiary subprocessors

The following entities are subsidiaries of Vehicle Vision International Limited. Accordingly, they function as subprocessors to provide the Software.

Entity name	Entity country
Vehicle Vision Japan K.K.	Japan

## What is a third party software integration?

Vehicle Vision engage with specific third party software providers primarily via API integrations, where data is processed (which may contain personal data). The express intention of integrations is to improve day-to-day productivity and data visibility for the mutual Customer of Vehicle Vision and the third party software provider. Typically, this is a processor to processor relationship, with the mutual Customer of each party being the controller of the data. Vehicle Vision also have system integrations with third party software providers that are data controllers in their own right. The functions for the various integrations are explained in the tables below.

## Third party software integration obligations

With the exception of an integration that does not process personal data, Vehicle Vision will only share data with a third party software provider where there is mutual Customer of Vehicle Vision and the third party software provider. The mutual Customer (data controller) will always be aware of the sharing of data between Vehicle Vision and the third party software provider when personal data is processed. Vehicle Vision may have a separate contract or data sharing agreement in place with the third party software provider for due diligence.

It is the responsibility of the third party software provider to have an appropriate agreement in place with the mutual Customer that covers their necessary obligations.

## Third party integrations - processor to processor

Vehicle Vision processor to processor integrations are based primarily on a secure API integration where data can be shared in both directions (both push and pull). The following table describes the legal entities whom Vehicle Vision are engaged with through an integration.

Entity name	Purpose	Entity country
Autoconnect Limited	<p>Autoconnect provide aftermarket solutions and electronic vehicle health check (VHC) software to the automotive industry.</p> <p>The purpose of the software integration between Autoconnect and Vehicle Vision is to increase productivity in car dealership aftersales departments; to provide richer data reports for dealerships; and to assist with automation of tasks for Vehicle Vision Software Customers.</p> <p>'End customer' and VHC information can be retrieved from the Autoconnect system. Updates can be posted back to the Autoconnect system. Final outcomes for closed VHCs within the Autoconnect system can be shared with Vehicle Vision for comparative outcome reporting.</p> <p>'End customer' data is shared for the purpose of sending communications. VHC information is shared for the purpose of presenting the information and findings to the 'end customer'.</p>	United Kingdom
cap hpi Limited	<p>cap hpi provide data and information relating to new car pricing, vehicle specifications and used car valuations.</p> <p>The purpose of the software integration between Vehicle Vision and cap hpi is to provide on-demand vehicle valuations and specification look ups to end customers and to ultimately assist car dealers (Vehicle Vision licence subscribers) with buying vehicles.</p> <p>'End customer' data is not shared through this integration.</p>	United Kingdom
Eskimo Software Limited	<p>Eskimo Software provide a CRM and lead management software package to the automotive industry.</p> <p>The purpose of the software integration between Vehicle Vision and Eskimo is to increase productivity and efficiencies in car dealerships by transferring customer lead information from Vehicle Vision to Eskimo; and to assist with automation of tasks for Vehicle Vision and Eskimo mutual clients.</p> <p>Data shared can include contact information related to End User Car Owners including; customer name; customer email address; customer mobile number; vehicle registration, vehicle mileage, video and photo assets.</p>	Ireland

Entity name	Purpose	Entity country
Infomedia LTD	<p>Infomedia provide software solutions to the parts and service sector of the automotive industry.</p> <p>The purpose of the software integration between Infomedia's Superservice Triage product and Vehicle Vision is to increase productivity in dealership aftersales departments; to provide richer data reports for dealerships; and to assist with automation of tasks for Vehicle Vision Software Customers.</p> <p>'End customer' and vehicle inspection information is shared via Superservice Triage. Updates can be posted back to Superservice Triage. Final outcomes and follow-up information for closed inspections within Superservice Triage can be shared with Vehicle Vision for comparative outcome reporting.</p> <p>'End customer' data is shared for the purpose of sending communications. Vehicle inspection information is shared for the purpose of presenting the information and findings to the 'end customer'.</p>	Australia
Keyloop (UK) Limited	<p>Keyloop provide software solutions for the automotive retail environment.</p> <p>The purpose of the software integration between Keyloop and Vehicle Vision is to increase productivity, efficiency and automation. Where the data originates from Keyloop - customer, vehicle and VHC data can be directly transferred from the Keyloop Dealer Management System (DMS). Where the data originates from Vehicle Vision - customer lead information can be shared with Keyloop sales solutions and modules.</p> <p>'End customer' and VHC information can be retrieved from and shared with the Keyloop systems.</p> <p>'End customer' data is shared for the purpose of sending communications and keeping accurate records. VHC information is shared for the purpose of presenting the information and findings to the 'end customer'.</p>	United Kingdom
Mad Devs Limited	<p>Mad Devs Limited provide an intelligent digital lead aggregator solution built specifically for the automotive industry called iTrackLEADS.</p> <p>The purpose of the software integration between Vehicle Vision and iTrackLEADS is to increase productivity in car dealerships by transferring customer lead information from Vehicle Vision to iTrackLEADS; and to assist with automation of tasks for Vehicle Vision and iTrackLEADS mutual clients.</p> <p>Data shared can include contact information related to End User Car Owners including; customer name; customer email address; customer mobile number; vehicle registration, vehicle mileage, video and photo assets.</p>	United Kingdom

Entity name	Purpose	Entity country
Real Time Communications Limited	<p>Real Time Communications (RTC) provide software for car dealerships in sales and aftersales operations.</p> <p>The purpose of the software integration between RTC and Vehicle Vision is to increase productivity in dealership aftersales departments; to provide richer data reports for dealerships; and to assist with automation of tasks for Vehicle Vision Software Customers.</p> <p>'End customer' and VHC information can be retrieved from the RTC system. Updates can be posted back to the RTC system. Final outcomes and follow-up information for closed VHCs within the RTC system can be shared with Vehicle Vision for comparative outcome reporting.</p> <p>'End customer' data is shared for the purpose of sending communications. VHC information is shared for the purpose of presenting the information and findings to the 'end customer'.</p>	United Kingdom
Service Visuals LLC	<p>Service Visuals provide technical vehicle animations to assist car dealership aftersales departments with clearer technical explanations for vehicle owners.</p> <p>The purpose of the software integration between Service Visuals and Vehicle Vision is to assist (as necessary) Vehicle Vision Software users with providing an additional technical explanation to a vehicle owner ('end customer') when an issue has been found on their vehicle following inspection.</p> <p>Vehicle Vision Software users can choose appropriate animations (via the API integration) as necessary.</p> <p>'End customer' data is not shared through this integration.</p>	United States

### Third party integrations – independent controllers

Vehicle Vision integrations with independent data controllers are based on a secure API integration where the Vehicle Vision system typically shares specific data with the third party system. The following table describes the legal entities whom Vehicle Vision are engaged with through an integration.

Entity name	Purpose	Entity country
Bumper International Limited	<p>Bumper is an automotive payment provider who provide car dealerships with an online 'interest free' and 'pay now' payment solution for customers of the car dealerships.</p> <p>The purpose of the software integration between Bumper and Vehicle Vision is to provide the car dealership 'end customer' with interest free and pay now payment options at the point at which they make decision on the Vehicle Vision system to proceed with recommended remedial work on their vehicle or to place an order on a vehicle by way of an online deposit.</p> <p>For the interest free payment option, the Bumper system will receive (via a secure API connection); first name; last name; email address; mobile number; and vehicle registration of the 'end customer' from the Vehicle Vision system. The line items; all associated costs; and order reference (job ID) will also be passed to the Bumper system via the API.</p> <p>For the pay now payment option, the Bumper system will receive (via a secure API connection) the cost and order reference (job ID) only. Personal 'end customer' details/data</p>	United Kingdom

	<p>for pay now transactions will be completed on the Bumper system by the 'end customer'.</p> <p>The Bumper system subsequently notifies the Vehicle Vision system (via a secure API connection) when a transaction on the Bumper system is complete.</p>	
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This policy does not give the Customer any additional rights or remedies and should not be construed as a binding agreement. The information herein with regard to subprocessors is only provided to illustrate Vehicle Vision's engagement process for subprocessors as well as to provide the actual list of third party subprocessors used by Vehicle Vision (which Vehicle Vision may use in the delivery and support of its Software). The information in relation to third party integrations provides a full list of current integrations.

**For questions related to Vehicle Vision International Limited subprocessors and third party software integrations, please contact us by email at [privacy@vehicle-vision.com](mailto:privacy@vehicle-vision.com)**