

Sub-Processors List

In the delivery of our Services, D2L and its affiliates may engage and use data processors to assist in providing D2L Services who may have access to and/or process Client Data ("Sub-Processors").

This page provides information regarding each of these Sub-Processors, including a description of the Sub-Processor services, the type of data made available for processing, and the location of data processing. Terms used on this page, but not defined, have the meaning as set forth in the applicable written agreement between your organization and D2L (the "Agreement").

Note that typical types of User Data include:

- First name
- Last name
- Learner records (e.g. courses, grades)
- Location data
- Student unique identifier
- Email address
- Title/position
- Employer/institution
- ID data
- Log-in information
- Connection Data

Cloud Providers & Internal Applications

Sub-Processor	Processing Location	Product	Purpose
Amazon Web Services, Inc. Amazon Web Services EMEA SARL Collectively ("AWS")	For Data storage: Customer Location Dependent AWS regions (including United States, Canada, Australia, Republic of Ireland, Singapore, India) For Data processing: Customer Location Dependent AWS regions and, for certain AI inference services, global AWS infrastructure	All D2L Products	Cloud Hosting
Microsoft 0365	Canada	Internal Operations	Corporate Productivity & Business Operations
Salesforce.com, Inc. (Steelbrick CPQ)	Canada, United States	Internal Operations	Client Relationship Management
Atlassian	Canada	Internal Operations	Project Management
Planhat AB	United States	Internal Operations	Client Relationship Management and Global Support
Qualtrics, LLC	Canada	Global Support	Surveys
Tableau	Canada	Internal Operations	Customer Data Analysis, Reporting and Business Intelligence.

Smartsheet	United States, European Union	Internal Operations	Project Management, Product Development and Professional Services
Salesloft, Inc.	United States, European Union	Internal Operations	Sales engagement and customer/prospect relationship management, including communication sequencing and meeting coordination

Support Providers & Professional Services

Sub-Processor	Processing Location	Product	Purpose
D2L Subsidiaries: • D2L Inc. • D2L Corporation • D2L Ltd • D2L Australia Pty Ltd • D2L Europe Ltd • D2L Asia Pte Ltd • D2L India Pvt Ltd • D2L Brasil Soluções de Tecnologia para Educação Ltda. • D2L Sistemas de Aprendizaje Innovadores • D2 R.L de C.V • H5P Group AS • D2L EU B.V.	Customer Location Dependent (United States, Canada, Mexico, Australia, Republic of Ireland, Singapore, India)	D2L may use any of its subsidiaries to process customer data and may be acting as sub-processors to deliver the Services to customers.	Support and Professional Services
Salesforce.com, Inc. (ServiceCloud)	Canada, United States	Global Support	Customer Support
Forethought Technologies Inc.	United States	Global Support	Customer Support
Natter box	United Kingdom	Global Support	Customer Support, Telephony
ANSR Source Content US LLC, ANSR Source India Private Limited	United States, India	Professional Service	Implementation Services for Customers in India
Language IO Inc	Canada	Global Support	Customer Support
Microsoft Azure IDP	Canada	Global Support	SSO for Brightspace Community & connected tools
SupportNinja	Canada	End User Support	Customer Support
The Results Companies, LLC dba Results CX	Canada, United States, Mexico	Global Support	Customer Support

Vanilla Forums ULC	Canada	Brightspace Community	Community Forums
TollFreeForwarding.com	United States	Global Support	Customer Support, Telephony
Qualtrics, LLC	Canada	Global Support	Surveys

Development Support Providers

Sub-Processor	Processing Location	Product	Purpose
EPAM Systems, Inc, EPAM Systems Canada, Ltd.	United States, India, European Union, LATAM	All D2L Products	Software Development and Ancillary Services
Agilisium Consulting LLC	India	Performance+	Data Migration

Platform Applications

Sub-Processor	Processing Location	Product	Purpose
Google Analytics	United States	Mobile Applications	Product Analytics
Hound Technology, Inc. (DBA Honeycomb)	United States	All	Insights & Performance Monitoring
BrightIdea	United States, European Union	Product Idea Exchange (PIE)	Product Feedback
Ironwasp Security Inc. (Domdog)	United States	Course Merchant	Security

Optional Third-Party Applications

Sub-Processor	Processing Location	Product	Purpose
Association Analytics	United States	Association Analytics	Learning Analytics
Atomic Jolt, LLC	United States, Australia, Ireland	Atomic Search & Atomic Assessments	Text Searching and Content Authoring
ClassEDU, Inc (AKA Class Technologies)	United States, Canada, United Kingdom, Germany, Japan, Singapore, Australia, New Zealand	Class for Higher Education, K12, and Corporate (Zoom and Teams)	Third-Party Training and Learning Integration for Conferencing
Copyleaks Technologies Ltd.	United States, Europe	Copyleaks -Plagiarism Detector, and AI Content Detection	Plagiarism Detection
Credly, Inc.	United States, Europe	Credly	Digital Credential Management

Domo, Inc.	Customer Location Dependent (United States, Republic of Ireland)	Performance Plus / P+	Client Reporting
FeedbackFruits BV	United States, Canada, Australia, Europe	FeedbackFruits Social Annotations, Team Based Learning and Polling, Peer Feedback, Tool Suite, and AI Practice	Pedagogy Tools
Fishtail Technologies	Customer Location Dependent (United States, Canada, Mexico, Australia, Republic of Ireland, Singapore, India)	Fishtail's "Empower"	SIS Integration
Genius SIS, Inc.	Canada, United States	Genius Extended Administration Solution	Workflow Management
Go1	United States, Australia, European Union	GO1 Content, Go1 Premium Subscription	Training & Development
Integrity Advocate Inc.	Customer Location Dependent (Canada, United Kingdom, European Union)	Integrity Advocate Proctoring - Participation Monitoring, Exam Proctoring, Exam Proctoring Plus, Live Proctoring, and Expose AI	Plagiarism Detection & Proctoring
Janison Solutions Pty Ltd	Australia, Singapore, United Kingdom, Europe	Janison Insights	Proctoring & Assessments
K-16	Customer Location Dependent	K-16: Scaffold Migration and Scaffold Archiving	Course Migration & Archiving
OpenSesame, Inc.	United States, Europe	OpenSesame Subscription - OpenSesame Plus 25, OpenSesame Plus 100, OpenSesame Plus Complete	eLearning Marketplace
ReadSpeaker	United States	ReadSpeaker WebReader/DocReader, TextAid and Custom Voice	Accessibility Tools
Seesaw Learning, Inc	United States, United Kingdom, Australia	Seesaw - Seesaw Instruction + Insights, Early Literacy, and English Language Development (ELD)	Early & Primary Learning Platform

ShuffleLabs, LLC	Customer Location Dependent (Canada, United States, Australia, Republic of Ireland, European Union, Singapore)	Brightspace Course Connector for Microsoft Teams	Application Integration
SchoolDay (Formerly Global Grid 4 Learning)	Canada, United States	GG4L Rostering Services and Grade Passback	Data Exchange Platform
Workato, Inc.	United States, Australia, Europe	D2L Link	Integration and Automation
YouSeeU, Inc. (DBA Bongo)	Customer Location Dependent (Canada, United States, South America, Europe, Australia, Asia)	Video Assignments, Virtual Classroom, AI Coach, and Role Play.	Video Assessment, Virtual Classroom, & AI-Powered Simulations
YuJa, Inc.	Canada, United States, Europe, Australia, Singapore	YuJa - Panorama and Verity	Content Accessibility & Proctoring
LearnWise Software International B.V.	AWS: EU (Dublin, Ireland), UK (London), US (Virginia), AUS (Sydney), CAN (Canada Central), Microsoft Azure: Frankfurt, Germany, Sweden, France.	Lumi Chat, Lumi Tutor, Lumi Feedback,	AI Powered Tutoring, Feedback & Chat Support. Internal Analytics.
Honorlock, Inc.	United States	Brightspace	Proctoring
Qwickly Inc.	United States, United Kingdom, Australia	Qwickly Attendance	Attendance, Engagement, and Reporting
Drieam B.V.	EU (Netherlands)	Eduframe SIS	Student Information System (SIS) and Online Storefront
Smiley Owl Tech S.L.	EU (Ireland)	SMOWLTech Proctoring	Online Proctoring and Exam Integrity

Optional Third-Party Professional Services

Sub-Processor	Processing Location	Product	Purpose
ANSR Source Content US LLC, ANSR Source India Private Limited	United States, India	Brightspace	Course Content Development
Hurix Systems Private Limited	India	Brightspace	Course Content Development & Migration Services