



driven
to
explore

maxdoro
mobile brains

General

Version management

Version	Date	Author	Description
1.0	20-10-2019	Maxdoro	Initial release
2.0	29-04-2021	Maxdoro	Sendgrid removed, Amazon AWS added
3.0	05-06-2023	Maxdoro	HubSpot and Futy added
4.0	22-08-2023	Maxdoro	Bundeling added
5.0	11-10-2023	Maxdoro	SingRequest removed, Pandadoc added
6.0	08-05-2024	Maxdoro	Exact Online added, Mollie changed, Zendesk Sell & Support removed
7.0	11-07-2024	Maxdoro	Mighty Networks added
8.0	29-08-2024	Maxdoro	Small changes for readability. Mighty Networks & Futy removed, WhatsApp & OpenStreetMap added. English version
8.1	13-11-2024	Maxdoro	Supplement to OpenStreetMaps, use of map layer issued by StadiaMaps.

Sub-processors used by Incontrol

Incontrol/Incontrol.FIX/Inspect4All/Dé Opleverapp

All data entrusted to our software is processed through Microsoft Azure within the European Union (EU). Other sub-processors handle limited personal data, and we have agreements such as Data Processing Addendum (DPA) and Standard Contractual Clauses (according to the GDPR) with all sub-processors.

Sub-processors and Services:

Sub-processors	Service	Location data & GDPR Compliance
Azure Microsoft	Cloud and hosting provider	West Europe (Netherlands) and North Europe (Ireland).
Google API	Geo/GPS service	United States – Model Contractual Clauses https://policies.google.com/privacy https://privacy.google.com/businesses/compliance/ https://policies.google.com/privacy/frameworks https://developers.google.com/terms
Google Analytics	Statistics/analytics provider	United States – Model Contractual Clauses https://policies.google.com/privacy https://privacy.google.com/businesses/compliance/ https://policies.google.com/privacy/frameworks
Google Drive	Storage/cloud provider	United States – Model Contractual Clauses https://policies.google.com/privacy https://privacy.google.com/businesses/compliance/ https://policies.google.com/privacy/frameworks
Firebase	Statistics/analytics provider	United States – Model Contractual Clauses https://policies.google.com/privacy https://privacy.google.com/businesses/compliance/ https://policies.google.com/privacy/frameworks https://firebase.google.com/support/privacy
Amazon AWS	SMTP e-mail service (SES)	United States – Data Processing Agreement in the AWS Service Terms Location server – Ireland (EU-West) https://aws.amazon.com/compliance/gdpr-center/ https://aws.amazon.com/compliance/eu-us-privacy-shield-faq/
Appcenter en DevOps (Microsoft)	Buildserver apps	United States – Model Contractual Clauses https://servicetrust.microsoft.com/ViewPage/GDPRGetStarted https://www.microsoftvolumelicensing.com/Downloader.aspx?DocumentId=16327

		https://www.microsoftvolumelicensing.com/Download.aspx?DocumentId=18644
HubSpot	CRM, marketing, and analytics provider	Europe (AWS Germany region) United States – Standard Contract Clauses (incorporated in Data Processing Agreement) https://legal.hubspot.com/dpa https://legal.hubspot.com/hubspot-regional-data-hosting-policy
CM	SMS services	Europe (Netherlands)
Mailchimp	Mass mailer provider	United States – Model Contractual Clauses https://mailchimp.com/legal/privacy/ https://mailchimp.com/help/about-mailchimp-the-eu-swiss-privacy-shield-and-the-gdpr/
WhatsApp for Business (Meta)	Customer engagement	Europe (Ireland) https://business.whatsapp.com/policy https://business.whatsapp.com/trust-and-safety https://www.facebook.com/privacy/policy https://www.facebook.com/business/news/facebooks-commitment-to-data-protection-and-privacy-in-compliance-with-the-gdpr
Exact Online	Administration, payment provider, and direct debit	Europe (Netherlands/Ireland) https://www.exact.com/terms-and-conditions https://files.exact.com/static/downloads/terms-and-conditions/Privacy-Policy-for-Exact-Services-EN.pdf
Mollie	Payment provider	Europe (Netherlands) https://www.mollie.com/gb/privacy
Europase Commissie	VAT-information service	Europe (Belgium)
PandaDoc	Contract & digital signing	United States – Standard Contract Clauses & DPA https://www.pandadoc.com/legal/ https://www.pandadoc.com/privacy-notice/
Bundeling	(Closed) Community features	Europe (Netherlands) https://www.bundeling.com/en/privacy-policy-en/
OpenStreetMap	Geo/GPS service	United Kingdom https://osmfoundation.org/wiki/Privacy_Policy https://osmfoundation.org/wiki/Services_and_tile_users_privacy_FAQ

Stadia Maps	Geo/GPS service	United States <i>We only use EU based servers/services</i> https://stadiamaps.com/privacy https://stadiamaps.com/terms-of-service
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Sub-processors role/use

Explanation of the use and data processing by each service

- **Microsoft Azure**
Hosting of web and database servers for Incontrol.
Processing all data entered by users.
- **Google API**
Used for Google Maps in forms
Processing addresses or coordinates. IP-address user.
- **Google Analytics**
Dashboarding on use Incontrol.
Processes user data like IP addresses, logged-in status, and browser details.
- **Google Drive**
Internal use for customer-related data.
Optionally for automatic storage of form output by users (PDF).
- **Firebase**
Processes crash data (iOS/Android).
Including OS details, app version, IP address, and error logs.
- **Amazon AWS SES**
Sends emails.
Processing sender and recipient details.
- **Appcenter**
Used for the development and storage of apps.
Processing email addresses test user.
- **DevOps (Microsoft)**
Internal use for building apps
Processing white labels (app names).
- **HubSpot**
Used as a CRM and for customer support, marketing
Processing CRM: Customer data such as name, address, phone number, email address, Chamber of Commerce (KvK) and VAT number. Contractual agreements and documents are also stored here. Support: Customer data such as name, IP address, and email + description of question/problem. Processing Marketing: Customer data such as (company) name, email, market segment, and tracking.

- **MailChimp**
Sends newsletters.
Processing contact details of customer administrators and/or users of Incontrol.
- **WhatsApp for business**
Engages customers/prospects via chat, video, and text.
Processing contact information and given information in the chat.
- **Exact online**
Manages financial records
Processing business and payment details like *(company) name, email address(es), contact person(s), Chamber of Commerce (KvK), payment & invoice details, address(es), phone number(s).*
- **Mollie**
Processes one-time or recurring payments
Handling business details and bank information.
- **VAT-information service**
Validates VAT numbers.
Processing VAT number.
- **PandaDoc**
Used for digital contract management.
Processing contact details, digital signatures and IP-address.
- **Bundeling**
Offers closed community features and app(s)
The name of the contact person, organization name, address, postal code, city, mobile phone number, email address. Optionally, age, date of birth, gender, job title, social media addresses, other profile data entered by the user.
- **OpenStreetMap**
In some modules/products of Incontrol, a (visual) map service is available. The module/product may use map services provided by the OpenStreetMap Foundation (St John's Innovation Centre, Cowley Road, Cambridge, CB4 0WS, United Kingdom, referred to as OSMF). Your internet browser or the application will connect to servers managed by OSMF, located in the United Kingdom (and other countries). Incontrol/Maxdoro has no control over these connections and the processing of data by OSMF. You can find more information about the processing of user data by OSMF in the OSMF privacy policy.
User's IP address, which location tiles/blocks are requested.
- **Stadia Maps**
A (visual) mapping service/service is available in some of Incontrol's modules/products. For this, the module/product can use map and geo services

provided by Stadia Maps. Stadia Maps, on the one hand, is a map layer on top of OpenStreetMap. In addition, Stadia Maps can be used for GEO coding requests (e.g. convert address, postal code, place to coordinates. This is done anonymously and without further context).

The address, zip code, city of an object. In addition browser type, ip address and operating system.

View the current list at <https://incontrol.app/en/solutions/information-security> or PDF ([EN](#) / [NL](#))