Schedule 2.2b to the DPA: LIST OF SUB-PROCESSORS (operating environment: SEC)

This Schedule 2.2b to the DPA sets out the sub-processors engaged for the processing of personal data under the applicable Service Agreement in the Refapp SEC operating environment (sec.refapp.se). The list is updated each time a new sub-processor is engaged or an existing sub-processor is replaced.

Sub-processor	Registration number	Contact information	Location	Processing activities
46Elks AB	556838-8184	46elks.se/gdpr +46 76 6861004 hello@46elks.com	EU/EEA (Sweden)	SMS service. Processes the candidate's name and mobile phone number, as well as the reference's name and mobile phone number.
Cleura AB	556630-7806	Magnus Brehmer, magnus.brehmer@citynetwork.eu	EU/EES (Sweden)	Database services. Processes: - Candidate's name, email address, phone number, and IP address; - Reference's name, mobile phone number, email address, and IP address; - Recruiter's name, phone number, title, profile image, company, LinkedIn URL, and email address.
GNS Sweden AB	556791-4915	https://www.gns.se/support/general-data-protection-regulation-gdpr/	EU/EES (Sweden)	Email service and support. Processes: - Candidate's name and email address - Reference's name and email address - Recruiter's name, phone number, title, profile image, company, LinkedIn URL, and email address
Cleura AB (formerly CityNetwork AB)	556630-7806	Magnus Brehmer, magnus.brehmer@citynetwork.eu	EU/EES (Sweden)	Server services. Processes Refapp user profile images and reference handling. Processes email addresses and company logos (not personal data).
Zammad GMBH	HRB 163946 B	HRB 163946 B Amtsgericht Berlin-Charlottenburg +49 30 55 57 160 00 enjoy@zammad.com	EU/EEA (Germany)	Support cases and follow-up/communication that may contain personal data.

Version history

Version	Date	Change	Comment
2025.02	2025-11-01	Revised to align with Refapp's new services and to relocate customer-specific terms to the Main Agreement.	