



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.

Direct Sub-processor

Sub-processor	Registration number	Contact information	Location	Processing activities
Talentwise AB	556956-0351	Per Bergland per@refapp.se	EU/EEA (Sweden)	Technical platform that enables the ordering, storage, and presentation of results from reference checks and background checks.
Resly	559266-6563	Oskar Svärd oskar.svard@resly.se	EU/EEA	Service for managing digital questionnaires completed by candidates. Contains candidate personal data based on the questions the customer chooses to ask.

In order to deliver the technical platform, Talentwise AB in turn utilizes the following sub-processors. These entities process personal data on behalf of Talentwise AB for specific functions within the system.

Sub-processors utilized by Talentwise AB

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-	EU/EES (Sweden)	Email service and support. Processes: - Candidate's name and email address - Reference's name and email address



Sub-processor	Registration number	Contact information	Location	Processing activities
		regulation-gdpr/		- 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.
Rrsly	559266-6563	Oskar Svård, oskar.svard@resly.se	EU/EEA	

Version history

Version	Date	Change	Comment
2026.02	2026-09-15	Resly added as a new sub-processor.	
2026.01	2026-06-25	Talentwise AB added as a new sub-processor.	
2025.02	2025-12-01	Revised to align with Refapp's new services and to relocate customer-specific terms to the Main Agreement. See previous version here: DPA_2.2a_NO-en_2025.02	