

Sub-Processor List

Certivo Inc. **Certivo** — certivo.ca **Effective Date:** March 1, 2026 **Last Updated:** June 2026

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1. Introduction

This document lists all third-party sub-processors engaged by Certivo Inc. ("Certivo") to process personal information on behalf of Certivo and its Tenant customers through the Certivo. A "sub-processor" is any third-party entity that processes personal information on behalf of Certivo in connection with the delivery of the Certivo. Processing includes the storage, access, transmission, or manipulation of personal information. This list is maintained in accordance with Certivo's Privacy Policy and is made available to Tenant customers for transparency and compliance purposes.

Cross-Border Processing — U.S. Transfers (Alberta and Quebec Residents)

Personal information of Alberta and Quebec residents may be transferred to, processed, or stored in the United States. Several core sub-processors — including **Stripe** (payment processing) and **Resend** (email delivery), as well as **Twilio** (SMS), **airSlate/SignNow** (e-signature), and **Sentry** (error monitoring) — are U.S.-based and process personal information in the United States. As a result, the personal information of individuals located in Alberta and Quebec (and elsewhere in Canada) may be subject to the laws of the United States, including lawful access requests by U.S. courts, law enforcement, and national security authorities. Where personal information is transferred outside Canada, Certivo relies on contractual and technical safeguards intended to provide a comparable level of protection. For **Quebec residents**, transfers of personal information outside Quebec are subject to a privacy-impact assessment under section 17 of Quebec's *Act respecting the protection of personal information in the private sector* (Law 25). See the Change Log (Section 6) for the current status of that assessment.

Notice of Foreign Processing (Alberta PIPA s.13.1)

Because Certivo uses U.S.-based service providers to process personal information outside Canada, section 13.1 of Alberta's *Personal Information Protection Act* (PIPA) requires Certivo to provide affected individuals with prior, transparent notice of that foreign processing. This section provides that notice. It states, for each foreign service provider: **(1)** the country in which the personal information is processed; **(2)** the purpose for which that foreign service provider is authorized to process the personal information; and **(3)** the contact information of a person — Certivo's Privacy Officer — who can answer questions about the collection or use of personal information by the foreign service provider. **(1)** and **(2)** — Country and purpose of foreign processing. The following Certivo sub-processors process personal information outside Canada, in the country and for the purpose stated: | Foreign Service Provider | Country of Processing | Purpose it is authorized to process personal information for | | Stripe, Inc. | United States (Stripe also operates globally) | Payment processing, subscription billing, and instructor/Tenant payouts via Stripe Connect | | Resend, Inc. | United States | Transactional and marketing email delivery | | Twilio Inc. | United States | SMS (text message) delivery of operational notifications | | airSlate Inc. (SignNow) | United States | Electronic signature of documents (e.g., waivers, consent forms) and capture of the signed PDF and signature audit trail | | Functional Software, Inc. (Sentry) | United States | Application error monitoring and crash reporting (configured to exclude names, emails, and other personal identifiers) | Personal information processed by these providers may be subject to the laws of the United States, including lawful access requests by U.S. courts, law enforcement, and national security authorities. Where personal information is transferred outside Canada, Certivo relies on contractual and technical safeguards intended to provide a comparable level of protection. (Certivo's other sub-processors — Google Cloud/Firebase, Google Calendar, Intuit/QuickBooks Online, and Xero — are described in Sections 2 and 3; Google Cloud and QuickBooks may process data in the United States and/or Canada, and Xero in New Zealand or other global data centres.) **(3)** — Contact for questions about foreign processing. An individual who has questions about the collection or use of their personal information by any of the foreign service providers listed above may contact Certivo's Privacy Officer: **Aaron Hoyte, Privacy Officer** Certivo Inc. 4952 Westbrooke Rd., Blackfalds, Alberta, Canada T4M 0L1 Email: privacy@certivo.ca (or aaron@certivo.ca)

2. Current Sub-Processors

Summary Table

#	Sub-Processor	Service Category	Data Processed	Primary Location	Tenant-Activatable?
1	Google Cloud / Firebase	Infrastructure	All Platform data	US / Canada (Montreal)	No (core infrastructure)
2	Stripe, Inc.	Payment Processing	Financial and identity data	US	No (core billing)
3	Resend, Inc.	Email Delivery	Contact and communication data	US	No (core email)
4	Functional Software, Inc. (Sentry)	Error Monitoring	Technical and diagnostic data	US	No (core monitoring)
5	Google (Calendar API)	Scheduling Integration	Scheduling and identity data	US	Yes
6	Intuit Inc. (QuickBooks Online)	Accounting Integration	Financial and identity data	US / Canada	Yes
7	Xero Limited	Accounting Integration	Financial and identity data	New Zealand / Global	Yes
8	Twilio Inc.	SMS Delivery	Phone numbers, message content	US	Yes
9	airSlate Inc. (SignNow)	E-Signature	Signer name/email, document contents, signature audit trail	US	Yes (not yet live)

"Tenant-Activatable" means

the sub-processor is only engaged when a Tenant Administrator explicitly enables the integration. If the integration is not activated, no data is shared with that sub-processor for that Tenant.

3. Sub-Processor Details

3.1 Google Cloud / Firebase

| Field | Details | |---|---| | ****Legal Entity**** | Google LLC (a subsidiary of Alphabet Inc.) | | ****Headquarters**** | 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA | | ****Services Provided**** | Cloud hosting (Firebase Hosting), NoSQL database (Cloud Firestore), user authentication (Firebase Authentication), file storage (Cloud Storage for Firebase), serverless compute (Cloud Functions for Firebase) | | ****Data Processed**** | All personal information stored in the Platform database, including user accounts, certification records, financial records, incident reports, payroll data, scheduling data, audit logs, and uploaded files (certificates, documents) | | ****Data Location**** | Firebase Hosting: US-based CDN with global edge caching. Cloud Firestore: Multi-region (nam5 — US). Cloud Functions: ****northamerica-northeast2** (Montreal, Canada)******. Cloud Storage: US. Firebase Authentication: US (Google-managed). | | ****Security Certifications**** | SOC 1 Type II, SOC 2 Type II, SOC 3, ISO 27001, ISO 27017, ISO 27018, ISO 27701, FedRAMP, CSA STAR | | ****Data Processing Agreement**** | Google Cloud Data Processing Addendum (available at cloud.google.com/terms/data-processing-addendum) | | ****Encryption**** | TLS 1.2+ in transit; AES-256 at rest (Google-managed keys) | | ****Sub-Processor's Privacy Policy**** | <https://policies.google.com/privacy> | | ****Certivo's Use**** | Core infrastructure. All Platform data is processed through Firebase/Google Cloud. Cloud Functions (including payroll calculations, authentication, and integrations) are deployed to the Montreal, Canada region (northamerica-northeast2) to minimize cross-border data processing for Canadian operations. |

3.2 Stripe, Inc.

| Field | Details | |---|---| | ****Legal Entity**** | Stripe, Inc. | | ****Headquarters**** | 354 Oyster Point Blvd, South San Francisco, CA 94080, USA | | ****Services Provided**** | Payment processing (one-time and recurring), subscription billing management, Stripe Connect (instructor and Tenant payouts), payment fraud detection, tax calculation support | | ****Data Processed**** | Cardholder names, email addresses, payment card information (processed by Stripe — not stored by Certivo), billing addresses, transaction amounts, subscription plan details, payout recipient names and banking information (via Stripe Connect), invoice references | | ****Data Location**** | United States (Stripe may process data in other jurisdictions per its own policies) | | ****Security Certifications**** | PCI DSS Level 1 (highest level), SOC 1 Type II, SOC 2 Type II | | ****Data Processing Agreement**** | Stripe Data Processing Addendum (available at stripe.com/legal/dpa) | | ****Encryption**** | TLS 1.2+ in transit; AES-256 at rest | | ****Sub-Processor's Privacy Policy**** | <https://stripe.com/privacy> | | ****Certivo's Use**** | Processes all monetary transactions on the Platform, including Tenant subscription payments, client payments for training services, and instructor payouts via Stripe Connect. Certivo does not store payment card numbers — all card data is handled exclusively by Stripe. |

3.3 Resend, Inc.

| Field | Details | |---|---| | ****Legal Entity**** | Resend, Inc. | | ****Headquarters**** | San Francisco, CA, USA | | ****Services Provided**** | Transactional email delivery (invoices, certificates, booking confirmations, password resets, system notifications), marketing email delivery (drip campaigns), email delivery tracking (delivery status, bounces) | | ****Data Processed**** | Recipient email addresses, recipient names (in email content), email subject lines, email body content (which may include names, class details, certification information, invoice summaries, and links), delivery metadata (timestamps, delivery status, bounce reasons) | | ****Data Location**** | United States | | ****Security Certifications**** | SOC 2 Type II | | ****Data Processing Agreement**** | Resend Data Processing Addendum (available upon request from Resend) | | ****Encryption**** | TLS 1.2+ in transit | | ****Sub-Processor's Privacy Policy**** | <https://resend.com/legal/privacy-policy> | | ****Certivo's Use**** | All emails sent from the Platform (transactional and marketing) are delivered through Resend. This includes invoice emails, certificate delivery, booking confirmations, scheduling notifications, drip campaign messages, and system alerts. Email delivery logs are retained by Resend per their own retention policy (typically 90 days). |

3.4 Functional Software, Inc. (Sentry)

| Field | Details | |---|---| | ****Legal Entity**** | Functional Software, Inc. (doing business as Sentry) | | ****Headquarters**** | 45 Fremont Street, 8th Floor, San Francisco, CA 94105, USA | | ****Services Provided**** | Application error monitoring, crash reporting, performance monitoring, error alerting | | ****Data Processed**** | Error stack traces, browser type and version, operating system, device information, anonymized user context (user ID and organization ID for error grouping — no names, emails, or other personal identifiers), page URLs, application version, error timestamps | | ****Data Location**** | United States | | ****Security Certifications**** | SOC 2 Type II, ISO 27001 | | ****Data Processing Agreement**** | Sentry Data Processing Addendum (available at sentry.io/legal/dpa/) | | ****Encryption**** | TLS 1.2+ in transit; AES-256 at rest | | ****Sub-Processor's Privacy Policy**** | <https://sentry.io/privacy/> | | ****Certivo's Use**** | Monitors all four Platform applications (Tenant Suite, Instructor Suite, Client Portal, Super Admin) for JavaScript errors, unhandled exceptions, and performance issues. Certivo has configured Sentry to minimize personal information transmission — no names, email addresses, or other personal identifiers are sent to Sentry. Only technical diagnostic data and anonymized user/organization IDs are transmitted. Error data is retained for 90 days. |

3.5 Google (Calendar API)

| Field | Details | |---|---| | ****Legal Entity**** | Google LLC (a subsidiary of Alphabet Inc.) | | ****Headquarters**** | 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA | | ****Services Provided**** | Calendar synchronization — creating, updating, and deleting calendar events in a Tenant's Google Calendar to reflect scheduled training classes | | ****Data Processed**** | Class titles (course type), scheduled date and time, class location, instructor names, client names (in event descriptions), class status | | ****Data Location**** | United States (Google servers) | | ****Security Certifications**** | SOC 1/2/3, ISO 27001, ISO 27017, ISO 27018 | | ****Data Processing Agreement**** | Google API Terms of Service; Google Cloud Data Processing Addendum (if applicable via Google Workspace) | | ****Encryption**** | TLS 1.2+ in transit; Google-managed encryption at rest | | ****Sub-Processor's Privacy Policy**** | <https://policies.google.com/privacy> | | ****Certivo's Use**** | ****Tenant-activatable.**** Only engaged when a Tenant Administrator explicitly connects their Google Calendar through the Integrations Manager. Certivo stores the OAuth refresh token (encrypted) to maintain the connection. |

The Platform syncs class schedules to the Tenant's Google Calendar. No data flows from Google Calendar back to Certivo. The integration can be disconnected at any time by the Tenant Administrator, which revokes the OAuth token. |

3.6 Intuit Inc. (QuickBooks Online)

| Field | Details | |---|---| | ****Legal Entity**** | Intuit Inc. | | ****Headquarters**** | 2700 Coast Avenue, Mountain View, CA 94043, USA | | ****Canadian Operations**** | Intuit Canada ULC, Edmonton, Alberta, Canada | | ****Services Provided**** | Accounting synchronization — syncing invoices and expenses from Certivo to the Tenant's QuickBooks Online account for bookkeeping and tax preparation | | ****Data Processed**** | Invoice data (client names, amounts, line items, dates, payment status), expense data (descriptions, amounts, categories, dates), vendor/payee names, tax amounts (GST/HST) | | ****Data Location**** | United States and/or Canada (depending on the Tenant's QuickBooks account region) | | ****Security Certifications**** | SOC 1 Type II, SOC 2 Type II | | ****Data Processing Agreement**** | Intuit Developer Terms of Service; Intuit Privacy Statement | | ****Encryption**** | TLS 1.2+ in transit; AES-256 at rest | | ****Sub-Processor's Privacy Policy**** | <https://www.intuit.com/privacy/statement/> | | ****Certivo's Use**** | ****Tenant-activatable.**** Only engaged when a Tenant Administrator explicitly connects their QuickBooks Online account through the Integrations Manager. Certivo stores the OAuth tokens (encrypted) to maintain the connection. The Platform syncs invoice and expense data from Certivo to QuickBooks for accounting purposes. The integration can be disconnected at any time by the Tenant Administrator. |

3.7 Xero Limited

| Field | Details | |---|---| | ****Legal Entity**** | Xero Limited | | ****Headquarters**** | 19-23 Taranaki Street, Te Aro, Wellington 6011, New Zealand | | ****Global Presence**** | Offices in New Zealand, Australia, United Kingdom, United States, Canada, Singapore | | ****Services Provided**** | Accounting synchronization — syncing invoices and expenses from Certivo to the Tenant's Xero account for bookkeeping and tax preparation | | ****Data Processed**** | Invoice data (client/contact names, amounts, line items, dates, payment status), expense data (descriptions, amounts, categories, dates), contact names and email addresses, tax amounts | | ****Data Location**** | New Zealand and/or global data centers (depending on the Tenant's Xero account region). Xero uses AWS infrastructure. | | ****Security Certifications**** | SOC 2 Type II, ISO 27001 | | ****Data Processing Agreement**** | Xero Developer Terms; Xero Privacy Notice | | ****Encryption**** | TLS 1.2+ in transit; AES-256 at rest (AWS-managed) | | ****Sub-Processor's Privacy Policy**** | <https://www.xero.com/legal/privacy/> | | ****Certivo's Use**** | ****Tenant-activatable.**** Only engaged when a Tenant Administrator explicitly connects their Xero account through the Integrations Manager. Certivo stores the OAuth tokens (encrypted) to maintain the connection. The Platform syncs invoice and expense data from Certivo to Xero for accounting purposes. The integration can be disconnected at any time by the Tenant Administrator. |

3.8 Twilio Inc.

| Field | Details | |---|---| | ****Legal Entity**** | Twilio Inc. | | ****Headquarters**** | 101 Spear Street, Suite 500, San Francisco, CA 94105, United States | | ****Services Provided**** | SMS delivery — sending notification messages (class reminders, compliance alerts, cert expiry notices) to phone numbers provided by Tenants | | ****Data Processed**** | Phone numbers, SMS message content, delivery status, timestamp | | ****Data Location**** |

United States (Twilio processes messages through US infrastructure) | | ****Security Certifications**** | SOC 2 Type II, ISO 27001, HIPAA eligible | | ****Data Processing Agreement**** | Twilio Data Protection Addendum (available at [twilio.com/legal/data-protection-addendum](https://www.twilio.com/legal/data-protection-addendum)) | | ****Encryption**** | TLS 1.2+ in transit; AES-256 at rest | | ****Sub-Processor's Privacy Policy**** | <https://www.twilio.com/legal/privacy> | | ****Certivo's Use**** | ****Tenant-activatable.**** Only engaged when a Tenant Administrator enables SMS notifications in Settings and provides recipient phone numbers. Certivo stores Twilio API credentials (encrypted) in Google Secret Manager. Messages are sent on behalf of the Tenant for operational notifications only (not marketing). The integration can be disabled at any time by the Tenant Administrator. Consent for SMS is managed per CASL requirements — see SMS Consent and Opt-Out Policy. |

3.9 airSlate Inc. (SignNow)

| Field | Details | |---|---| | ****Legal Entity**** | airSlate US LLC — SignNow is an airSlate product | | ****Headquarters**** | United States (Massachusetts). *Placeholder — confirm the exact registered entity name and address with SignNow before this entry is published.* | | ****Services Provided**** | Electronic signature collection — sending documents (waivers, consent forms, training agreements) for signature and capturing the completed signed PDF plus its signature audit trail | | ****Data Processed**** | Signer name, signer email address, document contents (which may include student/participant personal information and signatures), and signature audit-trail metadata (IP address, timestamps) | | ****Data Location**** | United States | | ****Security Certifications**** | SOC 2 Type II, ISO 27001, PCI DSS, HIPAA, 21 CFR Part 11, GDPR-aligned (per SignNow/airSlate published attestations). *Confirm current attestation scope at contract time.* | | ****Data Processing Agreement**** | airSlate/SignNow Data Processing Agreement — *to be obtained and executed before go-live.* | | ****Encryption**** | TLS 1.2+ in transit; AES-256 at rest | | ****Sub-Processor's Privacy Policy**** | <https://www.signnow.com/privacy-notice> | | ****Certivo's Use**** | ****Tenant-activatable; not yet live.**** The e-signature feature is integrated in code but gated OFF (`platform\_config/esign\_config.enabled = false`) pending founder configuration — see `docs/ESIGN-GO-LIVE.md`. When enabled, SignNow is engaged only when a Tenant sends a document for signature. The completed signed PDF is additionally re-stored in Certivo's own Storage (`esign-signed/{orgId}/`) under the same Google Cloud SOC 2 controls so a copy survives if the provider link expires. Certivo stores SignNow API credentials (encrypted) in Google Secret Manager. The integration can be disabled at any time by the Tenant Administrator. |

4. Change Notification Procedure

4.1 Advance Notice

Certivo will provide Tenant customers with ****at least 30 calendar days' advance written notice**** before:

- Engaging a new sub-processor to process personal information
- Materially changing the services provided by an existing sub-processor in a way that affects the processing of personal information
- Changing the data location of an existing sub-processor to a different jurisdiction

4.2 Notification Method

Change notifications will be provided via:

1. **Email** to the primary contact email address on file for each Tenant Administrator
1. **In-platform notification** displayed upon next login to the Tenant Suite
1. **Update to this Sub-Processor List** with the change reflected in the Change Log (Section 6)

4.3 Notification Content

Each change notification will include:

- The name and details of the new or modified sub-processor
- The type of personal information to be processed
- The purpose of the processing
- The location of data processing
- The security certifications held by the sub-processor
- The effective date of the change
- Instructions for objecting to the change (see Section 5)

4.4 Emergency Changes

In exceptional circumstances where a sub-processor change is required on an emergency basis (e.g., a critical sub-processor becomes unavailable due to a security incident), Certivo may engage a replacement sub-processor with less than 30 days' notice, provided:

- The replacement sub-processor provides at least equivalent security protections
- Tenants are notified as soon as feasible
- The full 30-day objection period is still provided

5. Objection Process

5.1 Right to Object

Tenant customers may object to the engagement of a new sub-processor or a material change to an existing sub-processor's processing activities.

5.2 Objection Procedure

To object to a sub-processor change:

1. **Submit a written objection** to the Privacy Officer at aaron@certivo.ca within 30 days of receiving the change notification

1. The objection must include:

- The Tenant's name and account identifier - The specific sub-processor change being objected to - The reason for the objection (e.g., jurisdictional concerns, security concerns, contractual requirements)

1. The Privacy Officer will **acknowledge receipt within 5 business days**

1. Certivo will **make reasonable efforts to address the objection**, which may include:

- Providing additional information about the sub-processor's security measures - Offering an alternative configuration that avoids the sub-processor (if technically feasible) - Engaging the sub-processor under additional contractual restrictions

1. If Certivo is unable to resolve the objection to the Tenant's reasonable satisfaction, the Tenant may **terminate its subscription** without penalty, and the standard data export and deletion procedures (per the Data Retention Policy, Section 8) will apply

5.3 Objection Does Not Apply To

The objection process does not apply to:

- Core infrastructure sub-processors (Google Cloud/Firebase, Stripe, Resend, Sentry) that are essential to Platform operation, as these are disclosed prior to the Tenant entering into the service agreement
- Sub-processor changes that do not affect the processing of personal information
- Updates to a sub-processor's privacy policy or terms that do not materially change the processing activities

6. Change Log

| Date | Change | Sub-Processor | Details | |---|---|---|---| | March 1, 2026 | Initial publication | All | Initial sub-processor list established | | June 19, 2026 | Added | airSlate Inc. (SignNow) | Disclosed the SignNow e-signature sub-processor (integrated, tenant-activatable, not yet live). HSFC Policy P3.1. | | July 5, 2026 | Updated (counsel review) | All | Added an explicit cross-border processing statement (Introduction) making clear that personal information of Alberta and Quebec residents may be transferred to, processed, or stored in the United States (via Stripe, Resend, Twilio, SignNow, and Sentry) and may be subject to U.S. law. Noted that transfers of Quebec-resident data are subject to a Law 25 s.17 privacy-impact assessment. **PIA status: pending** — to be completed before Certivo relies on U.S. sub-processors for Quebec-resident personal information. | | July 5, 2026 | Updated (counsel review) | All (U.S.) | Added a dedicated "Notice of Foreign

Processing (Alberta PIPA s.13.1)" section to the Introduction, stating the three s.13.1-required elements explicitly: (1) the country of processing for each U.S. service provider (Stripe, Resend, Twilio, SignNow, Sentry), (2) the purpose each is authorized to process personal information for, and (3) the contact information of the Privacy Officer who can answer questions about the foreign processing. Consolidated the customer-facing sub-processor disclosure draft into this master list. | _This Change Log will be updated each time a sub-processor is added, removed, or materially modified._

7. Contact Information

For questions about this Sub-Processor List, to request additional information about any sub-processor, or to submit an objection, please contact: ****Aaron Hoyte, Privacy Officer**** Certivo Inc. 4952 Westbrooke Rd. Blackfalds, Alberta, Canada T4M 0L1 Email: aaron@certivo.ca

This Sub-Processor List is effective as of March 1, 2026. *Certivo Inc. All rights reserved.* *Last Updated: July 5, 2026*