



Sprinklr Subprocessors Customer Frequently Asked Questions

Introduction

Hi Sprinklr Customers! Thanks so much for taking the time to read these frequently asked questions about our engagement of third-party subprocessors. We know data privacy is incredibly important to you. It is to us as well. We are committed to transparency, trust, and partnership in everything we do, and that includes the handling of your data.

We understand that when you share data with us you also must be mindful of and account for the onward data transfers, so you can foster the same trust with your customers and comply with your regulatory obligations.

Like many tech providers, Sprinklr uses subprocessors because we want to offer the best possible products and services to you. There are some capabilities we want to offer you, but we may not be able to manage them natively. Therefore, we engage trusted third parties who are experts at what they do, to help us make the products and services we give to you, even better.

The purpose of these FAQs is to provide you with some additional information, alongside our subprocessor [page](#), so that you have a full understanding of who your data is shared with and why. If you have any additional questions, we are always happy to help, you can contact us at privacy@sprinklr.com.



What is a subprocessor?

A subprocessor is a third-party organization, engaged by Sprinklr, as a data processor, to help us fulfil our obligations to you, as your data processor.

Our subprocessors help us provide our products and services to our customers, ensuring we can offer the best and most innovative features to make our customers and their customers happier.

What type of subprocessors does Sprinklr engage?

Sprinklr engages subprocessors to support with the operation of its business and the provision of its platform. We bucket these into 4 broad categories:

1. Affiliates

As a global organization, Sprinklr has worldwide affiliates. We engage our affiliates as subprocessors to perform some activities in connection with the services we provide you. Our affiliates are integral to the services we provide to you, including the management of your account, implementation, support, engineering, troubleshooting and security. When we talk about our affiliates, we mean Sprinklr entities, other than the entity you are contracting with, and the Sprinklr personnel within those entities.

Generally, the account teams supporting you, will be local to you. For example, if you are a customer based in Europe, your primary support team will be based there. However, our support teams, including security and engineering/tech ops teams, are based in the US, UAE, Singapore, and India. When we provide you with engineering, security, maintenance and troubleshooting support, those teams may require limited, permissioned, remote access to your data, for example, to resolve technical issues.

Your account team should be able to work with you to confirm which Sprinklr affiliates will support your account.

2. Product

Some of our subprocessors are integrated into our products, to support with the provision of specific features, which Sprinklr does not have the capability to provide natively.

For example, we have subprocessors who help with dynamic image creation, font and text editing, text translation, in-product notifications and guidance, and voice capabilities.

Not all of these subprocessors will be relevant to all customers. For example, some of these subprocessors are only specific to one or more products.

To dive a bit deeper, our voice capability subprocessors are only relevant in circumstances where you are utilizing our voice capabilities that only exist within our Sprinklr Service product. If you are not using Sprinklr Service, the voice subprocessors will not be relevant to you and will have no access to your data.

Likewise, our dynamic image and content creation subprocessors will only be relevant to you if you are using our Sprinklr Social or Marketing products. If you are just using Sprinklr Service or Insights, for example, you would not be creating marketing or publishing content and therefore, these subprocessors will not have access to your data.

3. Artificial Intelligence (AI) Development

In circumstances where we fine tune Sprinklr's proprietary AI models to build you a custom AI model, we use human labellers to tag and annotate datasets that you submit to us, based on your instructions to do so.

We also use human transcribers to help us label and transcribe audio recordings. This activity only occurs if the customer is having a custom voice model developed, such as automated speech recognition, intent detection, or speech to text transcription capabilities.

These may be human labellers from a Sprinklr affiliate or external third-party labellers. Labelling is done via secure access to a dedicated, Sprinklr-hosted platform. No data is sent to these third parties, nor can it be copied, exported, or downloaded from this platform.

Where possible, we try and mask personally identifiable information within the labelling platform so that third-party access is even more limited.

The subprocessors listed in the Machine Learning & AI Support section of our subprocessors [page](#) will only be relevant if you have instructed us to build a customer AI model for you. If you have not instructed us to train your model to increase accuracy and make it bespoke to you, then these subprocessors will not have access to your data.

4. Cloud Hosting

We use third-party cloud hosted data centres to host your data. Sprinklr does not have its own data storage centres, so we leverage third-party subprocessors who are equipped and able to deliver reliable infrastructure to maintain data storage.

You can choose for your data to be hosted in the US, EU, UAE, India, or Australia. For EU hosting, we leverage Microsoft Azure. Therefore, if you choose EU hosting, AWS and Google LLC will not have access to your data. Likewise, if you choose hosting in any other region, your data will be hosted by AWS unless you require US hosting and specifically require it to be hosted by Google LLC.

5. Implementation and Managed Service Providers

We use some trusted third-party organizations to perform limited and specific services to our customers, depending on your specific implementation, onboarding, or ongoing support needs. Usually this will be serviced by affiliate entities, but sometimes we may use experienced third parties to provide bespoke and tailored support. Where a third party is engaged to support your needs, your statement of work will detail any third-party services being leveraged. If there are no third-party implementation or managed service providers on your statement of work, then you can assume that none of these third parties are acting as a subprocessor, and, therefore, they will not have access to your data.

What personal data do Sprinklr's subprocessors access?

The subprocessors Sprinklr engages may have limited access to your personal data as part of that service provision. Some of this personal data may be user information, such as usernames, email addresses, or other contact information of your employees. For example, if our subprocessors are engaging with your employees to troubleshoot or resolve an issue, they may have access to this data.



In addition, when providing engineering, security, or technical support, our subprocessors may have some limited access to the production environment to resolve the issue. As a result of that limited access, your data may be visible to the subprocessor, but it would not be extracted or used for any other purpose or without your permission.

Likewise, if you are creating content within our products for publishing, the content you create may be processed by our subprocessor to support with that service provision.

Where you utilise our Sprinklr AI+ features, the data you input into those features is shared with our third-party generative AI providers. You control what data is fed into those features, and more information about data usage and Sprinklr AI+ can be found [here](#).

How does Sprinklr choose its subprocessors?

Sprinklr chooses its subprocessors based on their ability to provide the services needed, so Sprinklr can provide the best possible service to you. All subprocessors are thoroughly assessed by our security, privacy, legal, and procurements teams prior to any formal engagement or personal data sharing. This includes the completion of a detailed security and privacy questionnaire and a review of security and privacy information and practices, including policies and procedures, to the extent appropriate.

What contractual safeguards does Sprinklr put in place with its subprocessors?

We enter written contracts with our subprocessors that contain obligations at least as restrictive as those we commit to with you.

Some of the minimum terms we require our subprocessors to agree to include:

- ✓ requiring them to implement technical and organizational measures consistent with the measures we commit to complying with;
- ✓ where necessary, we leverage standard contractual clauses with our subprocessors, to safeguard any restricted transfers of data to countries that are not deemed to have an adequate level of data protection;
- ✓ our subprocessors only have access to, and process the data, which is necessary for the purpose for which they are instructed;
- ✓ our subprocessors only process data in accordance with the instructions you have given us;
- ✓ our subprocessors are contractually committed to supporting with legal compliance, such as providing information to support data protection impact assessments, providing reasonable assistance with individual rights requests, deleting data upon request, notifying us promptly of data breaches, and permitting us to conduct audits to ensure legal and contractual compliance;
- ✓ our subprocessors must have undergone privacy and security training and be subject to confidentiality obligations either legally or contractually; and
- ✓ our subprocessors are obliged to ensure that their personnel are reliable, trained, and subject to a contractually binding obligation to observe data privacy and security, to the extent applicable by the data protection laws.

How does Sprinklr share personal data with its subprocessors?

Some subprocessors, such as Sprinklr affiliates and our data tagging and annotating subprocessors, have remote access to Sprinklr systems to support with the service provision.



Other subprocessors, such as those that support with our Sprinklr AI+ feature, access data through an API connection.

What happens when Sprinklr engages a new subprocessor?

Sprinklr may engage new subprocessors from time to time, and we ask our customers to subscribe to receive updates of that notice on our subprocessor [page](#). Unless there is a necessary and emergency replacement for reasons outside of Sprinklr's control, you should receive notice of any changes to this list at least 30 days in advance of Sprinklr engaging the subprocessor.

If, after receiving notice, you have a legitimate, material reason to object to Sprinklr's use of a subprocessor, notice of the objection should be sent to privacy@sprinklr.com within fifteen (15) days after receipt of Sprinklr's notice. If there is an objection to a subprocessor, Sprinklr will cure the objection by: (i) not using use the subprocessor; (ii) taking corrective steps by in to address the issue and remove the objection and proceed to use the subprocessor; or (iii) ceasing to provide, or customer may agree not to use, (temporarily or permanently) the particular aspect of the service that would involve use of the subprocessor. If there is no objection, the subprocessor will be considered agreed to by the customer in accordance with our data protection agreements.

What is the impact if I choose not to use a certain subprocessor?

As Sprinklr relies on a number of subprocessors to support with its service provision, disablement on certain subprocessors will have an impact on the functionality of the product or specific features. More information can be found on our subprocessor [page](#).

Is Sprinklr liable for the acts and omissions of its subprocessors?

Sprinklr is liable to you for its subprocessor's actions. This liability is subject to the agreed liability cap in your MSA with Sprinklr.

Which subprocessors are relevant to me?

Please cross refer to the subprocessor list at sprinklr.com/subprocessors and check the products and features column on our [subprocessor page](#) to establish which subprocessors will be relevant to the products and services Sprinklr is providing to you.

