AUTHORISED SUB-PROCESSORS AND AUTHORISED TRANSFERS OF PERSONAL DATA

Last updated September 16, 2021

## PROS Cloud, Support \& Professional Services Sub-processors

We use sub-processors to perform certain technical, administrative and support functions required in the provision of our Subscription Service and related professional services, including consulting and training (the "Services"). A sub-processor is a third-party entity that has or may have access to or may process personal data. "Personal data" is any information relating to an identified or identifiable natural person and may include such person's name, email address, or other contact details. Prior to engaging a subprocessor, we evaluate the security, privacy and confidentiality practices of a sub-processor to determine that they are adequate to meet our security requirements in the performance of the Services.

A list of PROS sub-processors is located below. Each of the PROS sub-processors processes information on behalf of PROS for some, but not necessarily all, PROS Services. If you would like more information about which sub-processors process data with respect to the PROS Services that you use, please reach out to your designated PROS Customer Success Manager. PROS will update this list regularly and inform you of any updates in accordance with the terms of your agreement with PROS.

## 1. This list applies to the following PROS Airline solutions:

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- PROS Market Valuation Module (MVM)
- PROS RM (Essentials/ Essentials Network Add-On/Advantage)
- PROS RTDP (Advantage/Ultimate)
- PROS Real-Time Partner Availability (RTPA)
- PROS Real-Time Inventory Connector (RTIC)
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- PROS Group Sales Optimizer (GSO)
- PROS Retail for Airlines
- PROS Dynamic Offers
- PROS Pricing Cache
- All PROS airline solution connectors


## Infrastructure \& Other Sub-processors

| Legal Entity | Entity Location | Service Locations | Role | Customer Data Processed | Transfer Mechanism |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Acquia Inc. | United States | United States | Hosting Services for PROS <br> Customer portal, PROS Connect. | No access to Customer Data. Hosting Service only. | EU Standard Contractual Clauses |
| Message Systems, Inc. (dba SparkPost) | United States | Ireland <br> United Kingdom <br> United States | E-mail messaging services provider used to provide notifications to Customers' endusers. <br> Handles all notifications delivered through PROS Customer portal, PROS Connect. | Contact details of Customers' end- users, including travel agents and Users of the Service. <br> For the notifications: email addresses of Users and customer employees who have registered to receive notifications through PROS Connect. | EU Standard Contractual Clauses |
| Microsoft Corporation | United States | Microsoft hosts data on behalf of PROS in Azure data centers in Europe, North America, Australia and Middle East. Microsoft operates a global network of data centers and management and support facilities, and processing may take place in any jurisdiction where Microsoft or its subprocessors operate such facilities. | Cloud hosting and, if requested by Customer, credential authentication services. | No access to Customer Data. Hosting Service only - unless Customer has requested credential authentication services. | EU Standard Contractual Clauses |
| SoftLayer Technologies, Inc., an IBM company | United States | SoftLayer hosts data on behalf of PROS in data centers in North America and Europe. SoftLayer operates a global network of data centers and management and support facilities, and processing may take place in any jurisdiction where SoftLayer or its subprocessors operate such facilities. | Cloud hosting. | No access to Customer Data. Hosting Service only. | EU Standard Contractual Clauses |

## Professional Services Sub-processors

Our Professional Services sub-processors have limited access to our Customers' information, including Customer Data. This limited access is granted on an as needed basis only with approval through PROS internal authorization systems. Access is automatically reneged on expiration of the system approval. With Customer permission, the Professional Services sub-processor may be provided access to Customer Data for the purpose of dealing with implementation requests.

| Legal Entity | Entity Location | Service Locations | Role | Customer Data Processed | Transfer Mechanism |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Accenture LLP <br> Accenture <br> GmbH <br> Accenture AG | Accenture LLP <br> United States <br> Accenture <br> GmbH <br> Germany <br> Accenture AG <br> Switzerland | United States <br> PROS European based Customers: Germany \& Switzerland | Training Customers' endusers, consulting and implementation services. Accenture solely acts on PROS' instructions and can be viewed as part of PROS' own operational team. | All Customer environments | EU Standard Contractual Clauses |
| Malmur <br>  <br> Services d.b.a. <br> Technologias de Information Malmur S.A de C.V. | Mexico | Mexico <br> United States | Training Customers' endusers, consulting and implementation services. Malmur solely acts on PROS' instructions and can be viewed as part of PROS' own operational team. | All Customer environments | EU Standard Contractual Clauses |

## 2. This list applies to the following PROS Products \& Services:

- Smart Price Optimization and Management (Essentials/ Advantage /Ultimate)
- Smart Configure, Price, Quote (Essentials/ Advantage /Ultimate)
- PROS Contribution Management System (CMS)
- PROS Integrate
- PROS Control
- PROS Opportunity Detection
- PROS Smart CPQ
- PROS Real-Time Pricing Engine (RTPE)
- PROS Guidance


## Infrastructure \& Other Sub-processors

| Legal Entity | Entity Location | Service Locations | Role | Customer Data Processed | Transfer Mechanism |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Acquia Inc. | United States | United States | Hosting Services for PROS Customer portal, PROS Connect. | No access to Customer Data. Hosting Service only. | EU Standard Contractual Clauses |
| Message Systems, Inc. (dba SparkPost) | United States | Ireland <br> United Kingdom <br> United States | Handles all notifications delivered through PROS Customer portal, PROS Connect. | Email addresses of Users and Customer employees who have registered to receive notifications through PROS Connect. | EU Standard Contractual Clauses |
| Microsoft Corporation | United States | Microsoft hosts data on behalf of PROS in data centers in Europe, North America, Australia and Middle East. <br> Microsoft operates a global network of data centers and management and support facilities, and processing may take place in any jurisdiction where Microsoft or its sub-processors operate such facilities. | Cloud hosting and, if requested by Customer, credential authentication services. | No access to Customer Data. Hosting Service only - unless Customer has requested credential authentication services. | EU Standard Contractual Clauses |
| Salesforce.com, Inc. | United States | Salesforce hosts data on behalf of PROS in data centers in the United States and Europe. <br> Salesforce operates a global network of data centers and management and support facilities, and processing may take place in any jurisdiction where Salesforce or its sub-processors operate such facilities. | Cloud hosting: CRM and platform services provider for certain PROS Smart CPQ Customers that do not have an independent relationship with Salesforce. | No access to Customer Data Hosting Service only. | EU Standard <br> Contractual <br> Clauses <br> Binding <br> Corporate Rules |

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| Legal Entity | Entity Location | Service Locations | Role | Customer Data Processed | Transfer Mechanism |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Accenture LLP <br> Accenture GmbH <br> Accenture AG | Accenture LLP <br> United States <br> Accenture <br> GmbH <br> Germany <br> Accenture AG <br> Switzerland | United States <br> PROS European based Customers: Germany \& Switzerland | Training Customers' end-users, consulting and implementation services. Accenture solely acts on PROS' instructions and can be viewed as part of PROS' own operational team. | All Customer environments | EU Standard Contractual Clauses |
| Capgemini Technology Services | France | France | Training Customers' end users, consulting and implementation services. Capgemini solely acts on PROS' instructions and can be viewed as part of PROS' own operational team. | All Customer environments | N/A |
| Ernst \& Young LLP | United States | Global (location will depend on Customer location; please contact your PROS' Customer Success Manager for more specific details) | Training Customers' end-users, consulting and implementation services. E\&Y solely acts on PROS' instructions and can be viewed as part of PROS' own operational team. | All Customer environments | EU Standard Contractual Clauses <br> Binding Corporate Rules |

## 3. PROS Affiliate Sub-processors:

Customers may be supported by the following PROS Affiliates as required to provide the Subscription Service and Professional Services.

| Legal Entity | Entity Location | Transfer Mechanisms |
| :---: | :---: | :---: |
| PROS, Inc. | United States | EU Standard Contractual Clauses |
| PROS Bulgaria EOOD | Bulgaria | N/A |
| PROS Canada Operations, Ltd. | Canada | Adequacy Decision |
| PROS Europe Limited | England | Adequacy Decision |
| PROS France SAS | France | N/A |
| PROS Germany GmbH | Germany | N/A |
| PROS International Technology Limited | Ireland | N/A |
| PROS Middle East Technology Systems L.L.C. | United Arab Emirates | EU Standard Contractual Clauses |
| PROS Travel Retail SAS | France | N/A |
| PROS Technology Australia Pty. Ltd. | Australia | EU Standard Contractual Clauses |

