

Totara Sub-Processors

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To help deliver and support our products, Totara engages a carefully selected group of trusted third-party service providers (“Sub-processors”). These partners deliver essential services such as cloud hosting, infrastructure management, communications, analytics, and other operational functions that enable Totara to deliver, maintain, and improve its offerings.

Totara may also engage other entities within the Totara corporate group (affiliates) to carry out limited data-processing activities involving access to customer personal data.

Each Sub-processor listed below has undergone Totara's due-diligence process and is bound by contractual data-protection obligations consistent with Totara's internal security policies and applicable privacy laws, including the EU General Data Protection Regulation (GDPR).

If you have questions or concerns about a sub-processor, please contact us at privacy@totara.com.

Infrastructure Sub-Processors

Name	Data Location	Purpose	Security Measures	Categories of Data	Applicable Service
Amazon Web Services	United States; UK, EU	Cloud Service Provider	AWS Compliance Programs	Customer account information needed for product and service provisioning.	Totara Community
Cloudflare, Inc.	US	WAF (Web Application Firewall)	Cloudflare Trust Hub	Any Personal Data processed in Customer Logs, such as IP addresses,	Totara.com & Totara Community
OpenAI	US	AI models in support of Totara's AI-powered features	OpenAI Security and Privacy	Customer Personal Data created by customer and stored in Totara Community	Totara Community

Sales and Marketing Sub-Processors

Name	Data Location	Purpose	Security Measures	Categories of Data	Applicable Service
HubSpot	US	Marketing automation tool and analytics	HubSpot Trust Hub	Business contact details (name, title, email, company, industry, phone)	Totara Customers, Partners, & Prospects

Name	Data Location	Purpose	Security Measures	Categories of Data	Applicable Service
LinkedIn	US & Canada	Analytics and advertising	LinkedIn Privacy Information	Business contact details (name, email, company)	Totara Customers, Partners, & Prospects
Nooks Communications, Inc.	US	AI Enabled Sales Dialing Assistant	Nooks Privacy Policy	Business contact details (name, email, phone number, company)	Totara Customers, Partners, & Prospects
Cognism	EU	Business lead platform	Cognism Security	Profile of Contact Data, including: name, employer, job title, business email address, business telephone number, and LinkedIn URL	Totara Customers, Partners, & Prospects

Analytics and Feedback

Name	Data Location	Purpose	Security Measures	Categories of Data	Applicable Service
Google LLC	US	Google Analytics captures aggregated metrics to improve product functionality	Google Privacy Policy	Aggregated website usage data, IPs, user-agent	Visitors to Totara.com, Community, & Subscription Portal

Name	Data Location	Purpose	Security Measures	Categories of Data	Applicable Service
Microsoft Clarity	US	User experience (UX) analytics	Microsoft Clarity Data Privacy and Security	Website interaction data, IP addresses	Totara Partner Portal users
Canny	US	Product Feedback	Canny Security	Contact information (e.g., Name, e-mail) and any personal data submitted in support requests	Totara Community

Administrative and Productivity Tools

Name	Data Location	Purpose	Security Measures	Categories of Data	Applicable Service
Sage Intacct	US	Billing and Accounting	Sage Trust and Security	Business contact and billing information	Totara Customer & Partners
Breezy HR	US	Recruitment and applicant tracking	Privacy Controls	Applicant data, resumes, contact info	Totara Job Applicants
DocuSign, Inc.	US	Electronic signatures	DocuSign Trust Center	Names, email addresses of signatories	Totara Customer, Partners, Job Applicants
Syncari	US	CRM and marketing data unification	Syncari Trust Center	Business metadata across CRM and marketing platforms	Totara Customer, Partners, Job Applicants

Name	Data Location	Purpose	Security Measures	Categories of Data	Applicable Service
Microsoft	US	Corporate communication, storage, and productivity tools (O365)	Microsoft Trust Center	Email, documents, chat logs, collaboration data	Totara Internal Operations

Support Services

Name	Data Location	Purpose	Security Measures	Categories of Data	Applicable Service
Document 360	UK	Help Centre / Knowledge Base	Privacy Policy	Support content, FAQs, potentially user-submitted questions or feedback	totara.help
Atlassian Pty Ltd	Global (All Atlassian cloud across AWS regions)	Support ticket management	Atlassian Trust Center	Contact information (e.g., Name, e-mail) and any personal data submitted in support requests	All Totara Cloud Platform Services Customers and Partners
FreshWorks Inc. (FreshDesk, FreshDesk Freddy)	UK	Support ticket management and AI chatbot to assist in ticket management	freshworks Trust Center	Contact information (e.g., Name, e-mail) and any personal data submitted in support requests	Think Learning Customers and Partners
EDPO	Belgium (EU)	Acts as EU representative	EDPO ISO 27001 Certification	Contact details of data subjects and supervisory	Applicable to all Totara services offered to data

Name	Data Location	Purpose	Security Measures	Categories of Data	Applicable Service
		under Art. 27 GDPR for entities outside the EU/EEA		authorities (where inquiries or data requests are managed)	subjects in the EU/EEA requiring an EU representative under GDPR

Totara Affiliates

These affiliates may access data to perform limited activities for customer support and related services. All data transfers are governed by appropriate contractual clauses and security measures.

Affiliate	Location	Purpose
Totara Learning, Inc	USA	Customer service, support, IT and security operations
Totara Learning Solutions Ltd	NZ	Customer service, support, IT and security operations
Totara Learning (Europe) Limited	UK	Customer service, support, IT and security operations