Data processors

Introduction

This page explains which third-party providers Rosa uses, when processing personal data. “Rosa” means Rosa ASBL, a non-profit organization established at Cantersteen 12, 1000 Brussels, with enterprise number 0745.832.604.

This document forms part of the privacy policy of Rosa and of the data processing agreement between Rosa and its professional users. Rosa may update this page over time to reflect changes in its services and data processing activities.

We know that pages like this one can feel complicated. At Rosa, we do our best to make this content as clear and readable as possible. We take data protection seriously: we are selective about the data processors we work with, we run checks before and during our relationships with them, and we actively review and remove any processor that no longer serves a clear purpose.

To contact Rosa about its data processors, or to request information about previous data processors, please send an email to gdpr@rosa.be.

Who does this apply to?

The "Applies to" column in the table below uses colour-coded labels to show which category of data subject is concerned by each processor. The labels are defined as follows:

Visitors	Individuals who navigate on Rosa’s website and/or Application without being logged in to a Patient Account.
Patients	Individuals who navigate on Rosa’s website and/or Application while being logged in to a Patient Account.
Health professionals	Professional clients for outpatient care, acting solo or within a group practice or a hospital or healthcare institution that has chosen to collaborate with Rosa.
Partner	Vendors, customers, partners, collaborators, competitors, public authorities, and other relevant stakeholders of Rosa.

Processors used solely for Rosa's internal staff management (HR, payroll, security compliance) are not listed on this public page. Rosa staff are informed of those processors through a separate policy.

What categories of data may be processed?

To help readers understand the nature of the personal data processed by each third-party provider, Rosa uses the following information classification framework throughout this page. Each data processor is labelled with one or more of the categories below, reflecting the highest level of sensitivity of the data they may access or process on Rosa's behalf.

Classification	Description
Public	Information that is freely available and poses no risk if disclosed
Internal	Non-public information intended for use within Rosa only
Confidential	Information that is restricted and could cause harm if disclosed without proper legal basis or authorisation (including personal data).
Sensitive	Special category data within the meaning of Article 9 GDPR, subject to the highest level of protection (including personal health data,)

Not every data processor will access data at every classification level. Where a data processor may access data across more than one classification level, all applicable categories are indicated.

Rosa applies this classification framework in accordance with its internal information security management system (***ISMS***). Data processors handling Confidential or Sensitive data are subject to enhanced contractual safeguards and, where applicable, in compliance with the GDPR.

General framework for Rosa’s data processing activities

Rosa relies on services provided by other companies to perform part of its data processing activities.

Where Rosa engages data processors, Rosa ensures that they are subject to data protection obligations that provide at least the same level of protection for personal data as those in its privacy policy and data processing agreement.

Rosa may use data processors located outside the European Economic Area (EEA). Where a transfer takes place to a third country which has not been recognized by the European Commission as offering an adequate level of protection, Rosa ensures that appropriate safeguards are in place in accordance with Articles 46 and 49 of the GDPR, and in particular, that (i) the recipient is covered by a suitable framework recognized by the Commission as providing an adequate level of protection for personal data, including the EU-US Data Privacy Framework; or (ii) that the standard contractual clauses approved by the European Commission (***SCCs***) or equivalent ad hoc clauses are incorporated into the contract concluded between Rosa and those service providers.

The specific transfer mechanism applicable to each processor outside the EEA is indicated in the tables below. As between you and Rosa, Rosa will remain responsible for any acts or omissions of its data processors as if they were Rosa's acts or omissions.

Data processors

Data processor	Description of processing	Data location & Safeguards	Data classification	Applies to
Cloud Hosting and Infrastructure				
Amazon Web Services EMEA SARL (Luxembourg)	Cloud hosting infrastructure for all data processed in the Rosa applications.	EU	• Confidential • Sensitive	Patients Health professionals Partners Visitors
MongoDB Limited (Ireland)	Database provider underpinning the Rosa applications	EU	• Confidential • Sensitive	Patients Health professionals
Scaleway (France)	Cloud hosting infrastructure for all data processed in the Rosa applications.	EU	• Confidential • Sensitive	Patients Health professionals Partners Visitors

Data processor	Description of processing	Data location & Safeguards	Data classification	Applies to
Communications and Notifications				
Amazon Web Services EMEA SARL (Luxembourg)	Sending of email confirmation and reminders.	EU	• Confidential • Sensitive	Patients Health professionals
Apple, Inc.	Sending of push notifications	EU	• Confidential	Patients
CM.com Belgium NV (Belgium)	Sending SMS appointment reminders	EU	• Confidential	Patients Health professionals
Google Ireland Ltd (Ireland)	Sending of push notifications	EU, USA (SCCs)	• Confidential	Patients
Scaleway (France)	Sending of email confirmation and reminders.	EU	• Confidential • Sensitive	Patients Health professionals
Tresorit AG	Secure file sharing with end-to-end encryption (with client-side encryption) for transmitting confidential and sensitive documents.	EU, Switzerland (adequacy decision) and USA (SCCs)	• Confidential • Sensitive	Patients Health professionals Partners
Whereby (Norway)	Video streaming infrastructure for teleconsultation services between patients and health professionals	EEA, limited exceptions per Whereby's Privacy Policy (SCCs)	• Confidential	Patients Health professionals
Customer Support and Marketing				
HubSpot Ireland	CRM platform: management of user	Ireland, USA (SCCs)	• Confidential	Patients

Data processor	Description of processing	Data location & Safeguards	Data classification	Applies to
Ltd (Ireland)	and prospect relationships (including marketing communications and customer support); and product / services data collection for improvement purposes.		• Sensitive	Health professionals Partners Visitors
Loom	Video creation tool for demo and customer support purposes	USA (SCCs)	• Confidential	Health professionals Visitors
Mapping & Geolocation				
Woosmap	Geolocation and mapping service used to power location-based search on Rosa.be, enabling health professionals to be found by location.	EU, USA (SCCs)	• Public • Confidential	Patients Health professionals Visitors
Analytics and Monitoring				
Google Ireland Ltd (Ireland)	Google Analytics,	EU, USA (SCCs)	• Confidential	Visitors (exclusively on pro.rosa.be)
Hotjar Ltd (Malta)	Website and product analytics: user feedback collection and surveys	EU (user and usage data) USA (exception-based logging) (SCCs)	• Confidential	Patients Health professionals Visitors
MixPanel International, Inc.	Website and product analytics: understanding how patients and health professionals use Rosa, how a feature	EU	• Confidential • Sensitive	Patients Health professionals Visitors

Data processor	Description of processing	Data location & Safeguards	Data classification	Applies to
	is used, what's the impact of a (new) feature.			
New Relic	Infrastructure monitoring, Quality assurance, and Real User Monitoring	EU; USA (SCCs)	• Confidential	Patients Health professionals Visitors
Report-URI Ltd	Collection of browser security errors to detect online attacks	UK (adequacy decision), USA (SCCs)	• Confidential	Patients Health professionals Visitors
Userflow, Inc.	Onboarding modules, resource center and limited product analytics.	EU	• Confidential	Health professionals Patients Visitors
Mobile App Distribution				
Apple, Inc.	Distribution of the Rosa iPhone application via the Apple App Store.	EU	• Confidential	Patients
Google Ireland Ltd (Ireland)	Distribution of the Rosa Android application via the Google Play Store	EU, USA (SCCs)	• Confidential	Patients
Payments				
Mollie (Netherlands)	Payment processing for Rosa Membership	EU, USA, Philippines, UK, India, Australia (adequacy decision and SCCs)	• Confidential	Health professionals
User Experience (UX) Research and Design				

Data processor	Description of processing	Data location & Safeguards	Data classification	Applies to
Figma, Inc.	Design, prototyping and collaboration tool used for product design and UX research.	USA (SCCs)	• Confidential	Health professionals Partners
Operations				
Google Ireland Ltd (Ireland)	Workspace (GMail, Drive, Docs, Sheets, Slides, Drive, Meet, etc): internal and external communications; internal collaboration; compliance (eg GDPR); and operations (eg research interviews; and records relating to partners, prospects, vendors, and other stakeholders).	EU	• Public • Internal • Confidential • Sensitive	Patients Health professionals Partners Visitors
Atlassian	Project management and documentation platform (Jira, Confluence) for internal collaboration, documentation and ticketing purposes.	EU	• Public • Internal • Confidential • Sensitive	Patients Health professionals Partners
Slack Technologies Limited, a Salesforce company	Internal messaging app: used for support and operational purposes.	EU	• Confidential • Sensitive	Patients Health professionals
Odoo (Belgium)	Business operation platform: accounting, invoicing, contract workflows, document storage, and CRM.	EU	• Confidential	Health professionals Partners
Promeris Services	Billing and accounting services	EU	• Confidential	Health professionals

Data processor	Description of processing	Data location & Safeguards	Data classification	Applies to
ASBL (Belgium)				Partners
Data Analytics and Business Intelligence				
Datawarehouse.io (A Bayard Bradford Company)	Automated formatting and transformation of Hubspot data to feed Tableau dashboards.	EU	• Confidential • Sensitive	Patients Health professionals Partners Visitors
Tableau (Salesforce)	Business intelligence tool for reading and visualizing data from Rosa's database for reporting.	EU	• Internal • Confidential • Sensitive	Patients Health professionals
TIMi SPRL (Belgium)	ETL (Extract, Transform, Load) operations for reporting and analytical purpose.	EU	• Confidential • Sensitive	Patients Health professionals Partners Visitors
SEO and Online visibility				
Ahrefs Pte. Ltd	SEO Tracking suite	Singapore, Global (SCCs)	• Public • Internal	Health professionals
MentionBox (Belgium)	SEO consultancy services	EEA	• Public • Confidential	Health professionals
AI-Powered Tools				
Anthropic Ireland, Limited	AI usage to support internal operations (including analysis and content generation, coding and support); compliance monitoring; and research	USA (SCCs)	• Public • Internal • Confidential • Sensitive	Patients Health professionals Partners Visitors
Mistral AI		EU, USA (SCCs)		

Data processor	Description of processing	Data location & Safeguards	Data classification	Applies to
OpenAI, LLC and OpenAI Ireland Ltd	and development of AI-powered products and features.	USA (SCCs)		

♻️ Changes to this document

This document enters into force as of 6 July 2026. We keep this document under regular review to ensure it is current and we may update it over time to reflect the changes in our services and data processing activities. If we do so, we will post the updated document on this webpage.

Summary of changes

Version number and effective date	Change(s) made
V1.0 - 14 Jan 22	
V1.1 - 1 Feb 22	Addition of Socket, Inc to the list of data processors. Addition of New Relic to the list of data processors.
V1.2 - 7 Feb 22	Addition of Google Ireland ltd to the list of data processor for the Workspace suit
V1.3 - 11 Mar 22	Location of the processing updated for Google (EU instead of USA)
V1.4 - 1 Apr 22	Addition of Hotjar to the list of data processors
V1.5 - 9 May 22	Removal of Functional Software, Inc. doing business as “Sentry” as a data processor (as of 22 April 2022) and addition of Datawarehouse.io A Bayard Bradford Company as a data processor (as of 9 May 2022).

V1.6 - 20 Jun 22	To better understand the performance of our onboarding, we process some metadata about interactions between our staff and our customers. To reflect this, we have made some changes to the description of the processing activities via Hubspot and the types of data processed via Hubspot and Pendo. We would also like to use Hotjar to send surveys for analytical and quality improvements purposes. We have therefore slightly edited the description of the processing as well as the data processed. Finally, we have clarified that Partena Promeris might also process the personal data of our vendors (and their staff) for billing and accounting purposes.
V1.7 - 1 Aug 22	We are using Slack to communicate internally about our product and services, including new users. We may use Slack to share limited personal data about health professionals. To build and improve our products and services, we are using Figma to design, prototype and collaborate internally or with users and to store input shared by user research participants. Figma may therefore be used to store limited personal data about health professionals and/or other research participants.
V1.8 - 31 Jan 23	We are using Vanta, a security and compliance platform to help us stay compliant from a security perspective.
V1.9 - 9 Feb 23	As from 13 Feb 2023, we will be using Report-URI to help us detect some of the most dangerous attacks online. As from 13 February 2023, we will be using Mbrella to help employees manage their own mobility budget.
V1.10 - 23 Mar 23	As of 21 March 2023, we have decided not to use Facebook Pixel anymore. As such, we have removed Meta/Facebook from our list of data processors.
V1.11 - 18 Apr 23	As from 24 April 2023, we will be using Mixpanel for analytics purposes. As such, we have added Mixpanel to our list of data processors.
V1.12 - 7 Sep 23	As from 7 September 2023, we will be using Tresorit AG to share confidential files instead of Wormhole. As from 2 October 2023, we will be using Userflow to facilitate onboarding modules, in-app announcements and for limited product analytics purposes instead of Pendo.
V1.13 - 27 Nov 23	We have updated the information that might be processed via Slack.
V1.14 - 3 Sep 24	We have clarified the description of the processing activities of 4 existing vendors: Amazon Web Services; Hotjar; Mixpanel; and Userflow.

V1.15 - 9 Oct 24	We have clarified the safeguards in place for international data transfers outside the European Economic Area.
V1.16 - 31 Oct 24	Added usecure to the list of data processors used for other activities.
V1.17 - 15 Nov 24	Modified some links to point to our new Knowledge Base
V1.18 - 17 Apr 25	As of 1 January 2025, we have stopped using Keymetrics and Builder.io. As from April 17th, we will be using Apple and Mollie for Rosa applications. We will also be using the following data processors for other activities: Brand Compliance, Checkly, Loom, Phrase, Ravio, Q7 Leader and CodeRabbit.
V1.19 - 1 December 2025	We use the services of Whereby to offer teleconsultation services to health professionals and their patients. We also use Odoo and OpenAI to support our business needs. We have updated the processing region for Userflow (EU instead of USA).
V1.20 - 6 July 2026	Major structural revision. The page has been reorganised by functional category with a colour-coded "Applies to" column indicating which categories of data subject are affected by each processor. An information classification framework has been introduced to replace field-level data type descriptions. Staff-only data processors have been removed from this public page and are disclosed in Rosa's internal staff privacy notice. Processors added: Ahrefs, Anthropic, MentionBox, Mistral AI, Scaleway, Timi and Woosmap. Auth0 removed following migration to AWS and Scaleway.