

## **Instructure Third-party Service Provider Guide**

*Last Updated: 30 December 2024*

Instructure, Inc., and our affiliates, (collectively “**Instructure**”) use certain third-party service providers (collectively “**Vendors**”) to help us deliver our software and services (the “**Services**”) to institutions that purchase our Services (“**Customer**”). For a full list and description of our Services please visit <https://www.instructure.com/products>, <https://www.parchment.com/>, <https://www.scribsoft.com/>. The Services purchased by each Customer is described in the applicable Customer contract. These Vendors may process data provided to us by our Customers (which may contain personally identifiable data/personal data, collectively “**Customer Data**”) on Instructure’s or our Customer’s behalf.

### **What is a Sub-processor?**

A “Sub-processor” is a Vendor engaged by Instructure that may process Customer Data in accordance with our Customer's instructions (as communicated by Instructure) and the terms of the written agreement between Instructure and the Vendor. Sub-processors are used by Instructure to help us deliver our Services, for example, Instructure uses Amazon Web Services to host our product database and application servers.

### **Content Delivery Networks (“CDN’s”)**

CDNs are commonly used systems of distributed services that expedite the transmission of content. CDNs are used to optimize content delivery for the Services. If a CDN is listed as “Global” in the table it may process Customer Data in any country regardless of the Customer’s location to better support end-users of the Services. Generally, however, CDNs route to the edge server closest to the end-user of the Services.

### **Vendor Due Diligence.**

Instructure reviews our Vendor’s privacy and security practices prior to sharing any Customer Data with that Vendor. We contractually require that Vendors implement appropriate security, privacy, technical and organizational measures in accordance with applicable data protection laws. At a minimum, Instructure requires our Vendors to agree to substantially similar obligations as those contained in our [Instructure Data Processing Addendum](#)

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(<https://www.instructure.com/policies/data-processing-addendum>). Where the engagement of a sub-processor requires the cross-border transfer of Customer personal data, Instructure performs appropriate transfer impact assessments and ensures that a legally valid transfer mechanism is in place with that Vendor.

### **Process to Engage New Sub-processors.**

For all Customers operating under Instructure's [Data Processing Addendum](https://www.instructure.com/policies/data-processing-addendum) (<https://www.instructure.com/policies/data-processing-addendum>), or Parchment Data Processing Addendums (<https://www.parchment.com/data-protection-addendum/>, and <https://www.parchment.com/k12-dpa/>) or Digitary Data Processing Addendum ( we will provide notice of updates to our Sub-processors. Instructure undertakes to keep this list updated regularly to enable our customers to stay informed of the scope of sub-processing associated with the Services. For customers that have signed a bespoke data processing agreement with Instructure, any sub-processor notification will be provided in accordance with that agreement.

### **Learning Tools Integration Providers.**

Learning Tools Integrations (LTI) provide a framework through which Canvas Learning Management System (Canvas LMS) can send some verifiable information about a user to a third party. LTIs are software and tools that connect to Canvas LMS to provide certain services chosen by our Customers. To use the LTI, the third party needs to provide a Customer key and shared secret that Canvas LMS can use to generate a signature to verify the authenticity of the data sent to the LTI. External LTIs that share and access data from Canvas LMS are chosen by each Customer respectively. Instructure does not take responsibility for these LTIs and does not determine the Customer Data shared with LTIs. LTI providers are not classified as Vendors under this guide. Customers can find more information about LTI providers in our Canvas Basics Guide (<https://community.canvaslms.com/t5/Canvas-Basics-Guide/What-are-External-Apps-LTI-Tools/ta-p/57>), the EduApp Center (<https://www.eduappcenter.com/>), and the EdTech Collective Marketplace (<https://apps.instructure.com/>). Please note,

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certain LTI apps in the EduApp Center are provided by Instructure which include: Redirect Tool, Badgr LTI, Badgr Pathways, Box LTI, Vimeo, and YouTube.

### Security Information:

For more information about our security, privacy, and trust practices, please visit the links below.

**Digitary:** <https://www.parchment.com/platform/international/digitary-services/faq/>,

<https://www.parchment.com/privacy-policy-digital-services/>

**Instructure:** <https://www.instructure.com/trust-center>, <https://www.instructure.com/privacy-center>

**Parchment:** <https://www.parchment.com/resources/trust/>, <https://www.parchment.com/privacy-policy/>,

### How to use this guide.

- The “Processing Location” column describes the region in which the Customer Data is processed.
  - The Processing Location is usually determined by the geographical location of the customer.
  - For example, if the Customer is located in Europe, the processing location is either Ireland or Germany. If the Customer is located in the USA then the Customer Data is processed in the USA.
- The “Description of the Processing” column describes how Instructure utilizes the Vendor.
- The “Services” column describes the specific Services supported by this Vendor.
- The “Data Processed” column describes the Customer Data processed by that Vendor.

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### Infrastructure Sub-processors:

These Vendors are used to support our Services infrastructure, logging, hosting, and content delivery networks.

Vendor	Description of the Processing	Services	Data Processed	Processing Location(s)
<b>123.net</b> 24700 Northwestern Hwy. STE 700 Southfield, MI 48075	Colocation hosting.	Parchment Services	All Customer Data stored in these services.	USA
<b>Amazon Web Services</b> EU: 38 Avenue John F. Kennedy, L-185 Luxembourg USA: 410 Terry Avenue North, Seattle, WA 98109-5210	Infrastructure and application hosting provider for all services. Customer databases and application servers are hosted in their nearest region geographically.	All Services	All Customer Data contained in the Services.	Australia Canada Germany Ireland Singapore USA
<b>Amazon CloudFront</b> EU: 38 Avenue John F. Kennedy, L-185 Luxembourg USA: 410 Terry Avenue North, Seattle, WA 98109-5210	Content Delivery Network service which routes static and dynamic content to end-users of the Services.	Canvas Services	Services end-user encrypted IP address, static and dynamic content from the Services.	Global - Nearest edge server to the end-user.

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<b>Cloudflare, Inc.</b> 101 Townsend St., San Francisco, CA 94107	Used by Impact for edge caching and content delivery network for Impact’s backend applications.	Impact by Instructure Scribbles Services	End-user IP address, system configuration information, end-user activity in the Service.	Global - Nearest edge server to the end-user.
<b>Cloudflare, Inc.</b> 101 Townsend St., San Francisco, CA 94107	Used for translations in Canvas LMS if enabled by Customer in their instance.	Canvas LMS	Any information in the web UI that is translated	Germany Netherlands USA
<b>Clumio, Inc.</b> 4555 Great America Parkway, Suite 240 Santa Clara, CA 95054	This Vendor provides automated air gapped AWS secondary back-ups for security purposes.	Parchment Services Digitary Services	All Customer Data stored in these services.	Australia Canada Ireland USA
<b>Microsoft Azure</b> US: One Microsoft Way, Redmond, Washington 98052 EU: One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland	This Vendor provides back-up hosting services.	Parchment Services Digitary Services	All Customer Data stored in these services.	USA  Australia Canada EU

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<p><b>New Relic, Inc.</b>          188 Spear Street, Suite 1000, San Francisco, CA 94510 USA          Robert Niedermeier (our external DPO)          Hauptstraße 4, D-85579 Neubiberg / München, Germany</p>	<p>Software-as-a-service metrics and alerting application performance monitoring</p>	<p>Elevate Services          Scribbles Services</p>	<p>Application and infrastructure log data including end-user IP address</p>	<p>USA</p>
<p><b>Oberserve, Inc.</b>          520 S El Camino Real # 400, San Mateo, CA 94402</p>	<p>System, infrastructure, and logging service provider.</p>	<p>All Services</p>	<p>Services end-user IP address, application actions (i.e., page clicks), and application user id.</p>	<p>Australia          Canada          Germany          USA</p>
<p><b>OffSite LLC</b>          3618 7th Ave          Kenosha, WI 53140</p>	<p>Colocation hosting.</p>	<p>Parchment Services</p>	<p>All Customer Data stored in these services.</p>	<p>USA</p>
<p><b>Ping Identity Corporation</b>          1001 17th Street          Suite 100          Denver, CO 80202 USA</p>	<p>Ping1 Advanced Identity is used across all Services as identity management services for unified login functionality.   <b>NOTE:</b> This functionality will be part of the Services in the first</p>	<p>All Services</p>	<p>End-user ID, email, login credentials (password), organization (e.g. end-user's school), identity access management and technical information</p>	<p>Australia          Canada          Germany          Singapore          USA</p>

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	quarter of 2025.		(such as access privileges and access criteria, access log information), online and technical data (IP address, device ID and related data, connection data)	
<b>Solarwinds (AppOptics &amp; Pingdom)</b> 7171 Southwest Parkway, Bldg 400, Austin, Texas 78735	Application monitoring and logging.	Data Sync Elevate Canvas Credentials Canvas Badges Portfolium Scribbles	End-user IP address, application actions (i.e., page clicks), and application user id.	USA
<b>Splunk, Inc.</b> US: 270 Brannan Street, San Francisco, CA 94107 USA UK: Thames Tower, Station Rd. Reading RG1 1 LX United Kingdom	System, infrastructure, and logging service provider.	All Services	Services end-user IP address, application actions (i.e., page clicks), and application user id.	Australia Canada Germany USA

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### Services Sub-processors

Instructure uses these Vendors to support our Services.

Vendor	Description of the Processing	Services	Data Processed	Processing Location
<b>Canvas Services (Canvas LMS, Canvas Studio, Canvas Conferences, Canvas Commons, Canvas Credentials, Canvas Badges, Intelligent Insights)</b>				
<b>Amazon QuickSight</b> EU: 38 Avenue John F. Kennedy, L-185 Luxembourg USA: 410 Terry Avenue North, Seattle, WA 98109-5210	Add-on service for Customers that purchase custom development professional services. With QuickSight, admin users can perform analytics from Canvas DAP through interactive dashboards, pixel-perfect reports, natural language queries and embedded analytics.	Canvas LMS (Professional Services)	All Customer Data stored in Data Access Platform.	Australia Canada Germany Ireland Singapore USA
<b>Apple, Inc.</b> One Apple Park Way, Cupertino, CA 95014	This Vendor's standard API is used to store and convert iWork documents (Pages, Numbers, and Keynote) for end-users to allow for easier review, grading, and access in Canvas LMS. <b>US Customers Only.</b>	Canvas LMS	Any Customer Data stored in an iWork file.	USA



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Vendor	Description of the Processing	Services	Data Processed	Processing Location
<p><b>Blindside Networks Inc.</b> 116 Albert Street, Suite 901, Ottawa, Ontario, K1P 563, Canada</p>	<p>Hosting provider for Canvas Conferencing services (Big Blue Button). This Vendor is only applicable if the Customer uses Big Blue Button or Canvas Conferences.</p>	<p>Canvas Conferences (BigBlueButton)</p>	<p><i>Identification data:</i> name, user id, profile photo, IP Address. Collected when a user joins a virtual class. <i>Attendance information:</i> name, user ID, meeting ID, profile photo, content shared during session, IP address. Collected to provide attendance reports for session moderators. <i>Analytics data:</i> Name, Session content, Session interactions, browser, operating system. Collected to provide Session moderators with insights regarding your Session participation and attendance <i>Audio recordings:</i> Speech, Session content. Collected during sessions to offer</p>	<p>Australia Canada Ireland USA</p>

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Vendor	Description of the Processing	Services	Data Processed	Processing Location
			live speech-to-text subtitles and transcriptions. <i>Session recordings:</i> likeness, speech, session content. Collected to store and index sessions for later view. Used by session moderators for session insights. Used to improve the quality of the services and troubleshoot issues. <i>Technical data:</i> Name, User ID, Session interactions, IP address, browser, operating system, and audio quality score. Collected during a session for debugging purposes.	
<b>Clearout.io (Glitz Blitz Promotions Pvt. Ltd.)</b> 166 Geary St STE 1500, San Francisco, CA, US	This Vendor provides email validation services for badge confirmation email addresses. <b>Note:</b> this Vendor is only used for	Canvas Credentials Canvas Badges	End-user email address.	USA

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Vendor	Description of the Processing	Services	Data Processed	Processing Location
94108	US-based customers.			
<b>Heroku, Inc.</b> 415 Mission Street, 3rd Floor, San Francisco, CA 94105 USA	This Vendor provides web application hosting services for custom development purchased by Customers.	Custom Development Services	All Customer Data in the Services.	USA
<b>hotglue, Inc.</b> 6900 Wisconsin Ave #200, Bethesda, MD 20814 USA	This Vendor provides an integration in a Customer's instance to transfer data from the Customer's instance into the Customer's customer relationship management system. This integration is an opt-in feature by the Customer.	Canvas Catalog	End-user email, name, and any custom data that has been defined by the Customer.	Australia Canada Germany Ireland Singapore USA
<b>Khan Academy</b> PO Box 1630, Mountain View, CA 94042	This Vendor provides certain free services for educators that are available through Canvas LMS via an LTI link. <b>NOTE: For USA use only</b>	Canvas LMS	Name, email address, IP address, institution, any learning items sent from Khan to Canvas LMS via an LTI integration.	USA

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Vendor	Description of the Processing	Services	Data Processed	Processing Location
<p><b>Looker (Google Cloud)</b> 101 Church Street, 4th Floor, Santa Cruz, CA 95060, USA</p>	<p>This Vendor provides data visualization services for in-application analytics (New Analytics &amp; Admin Analytics). These analytic tools are used by Customers to analyze certain activities by their end-users. Primarily used for data caching for visualization.</p>	<p>Canvas LMS</p>	<p>Canvas LMS username, short name, email address, SIS identification number, and Avatar URL, hierarchy data (i.e., account, sub account, course, section, students), dimensions and their columns (i.e., assignments, calendar events, collaborations), and, facts and their measures (i.e., Canvas activity log including page view and participation count).</p>	<p>Australia Canada Germany Ireland Singapore USA</p>
<p><b>Lucid Software, Inc.</b> 10355 S. Jordan Gateway, Suite 300, South Jordan, UT 84095</p>	<p>This Vendor provides a link via an LTI connection which allows end-users to set up free user accounts with Lucid and transfer object data (such as flow charts) back into Canvas LMS. <b>Optional Subprocessor</b></p>	<p>Canvas LMS</p>	<p>First and last name, email address, location (e.g., country), Canvas LMS user role, Canvas LMS user id, and URL pointing to the end-user's profile picture/icon.</p>	<p>USA</p>

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Vendor	Description of the Processing	Services	Data Processed	Processing Location
<p><b>MongoDB, Inc.</b> (MongoDB Atlas) 1633 Broadway, 38TH Floor, New York, NY 10019</p>	<p>Private cloud hosting provider located in Instructure’s Amazon Web Services instance.</p>	<p>Canvas Credentials Canvas Badges</p>	<p>Storage of badge metadata including end-user name, email address, and badge information.</p>	<p>Australia Canada Ireland Singapore USA</p>
<p><b>Respondus, Inc.</b> 8201 164th Ave NE, Suite 200, Redmond, WA 98052 USA</p>	<p>Software tool that is activated and authorized by the Customer in their respective Canvas LMS instance. LockDown Browser is a custom browser that locks down assessments in LMS to maintain assessment integrity. <b>Optional Subprocessor</b></p>	<p>Canvas LMS Mastery Connect</p>	<p>Processes student end-user Personal Data when the "early exit" feature is used by a student to terminate an assessment before it is completed. The student is prompted to give a reason for terminating the assessment, which is then available to the instructor for review. Respondus stores the username (obtained via from the LMS) and the reason provided by the user for early termination.</p>	<p>USA</p>

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Vendor	Description of the Processing	Services	Data Processed	Processing Location
<p><b>Sisense Ltd.</b> 359 Broadway 4th Floor, New York, NY 10018</p>	<p>This Vendor provides a BI platform that provides SQL querying, data visualizations, and analytic-related services (e.g. scheduled reports). This Vendor is only applicable if the Customer has purchased Professional Services and this Vendor is described on the SOW or Order Form. <b>Optional Subprocessor</b></p>	<p>Canvas LMS (Professional Services)</p>	<p>All Canvas LMS data.</p>	<p>USA</p>
<p><b>Snowflake, Inc.</b> Suite 3A, 106 East Babcock Street, Bozeman, Montana 59715 USA FOZ Building, Gustav Mahlerlaan 300-314, 1082 ME Amsterdam, Netherlands</p>	<p>This Vendor provides a data warehouse platform. This Vendor is only applicable if the Customer has purchased Professional Services and this Vendor is described on the SOW or Order Form. <b>Optional Subprocessor</b></p>	<p>Canvas LMS (Professional Services)</p>	<p>All Canvas LMS data.</p>	<p>USA</p>

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Vendor	Description of the Processing	Services	Data Processed	Processing Location
<b>Turnitin, LLC.</b> 2101 Webster St., Suite 1900, Oakland, California 94612 USA	Optional Plagiarism checker tool. As determined by the Customer, this Vendor can be used via the Canvas Plagiarism Framework (API). Turnitin archives student papers by default only for the purposes of textual comparison. Institutions may choose to not have their papers archived in the service. <b>Optional Subprocessor</b>	Canvas LMS, Portfolium, Canvas Student ePortfolios	End-user information which includes course ID, course title, user role, email address, name, Canvas LMS user ID, IP address, and institution name.	USA
<b>Mastery Connect Services</b>				
<b>Accusoft Corporation</b> (PrizmDocCloud) 4001 N. Riverside Drive, Tampa, FL 33603, USA	Document conversion to PDF.	Mastery Connect	Any data contained in the document to be converted.	USA
<b>Chameleon Intelligent Tech Inc.</b> 7 Van Ness Ave., San Francisco, CA 94102 USA	Software-as-a-service used to provide announcements and in-application support user guides for Mastery Connect Services.	Mastery Connect	Customer institution name, institution ID, student end-user browsing information (language, username/ID), teacher and administrator end-user information (country code,	USA

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Vendor	Description of the Processing	Services	Data Processed	Processing Location
			email address, name).	
<b>GradeCam, LLC</b> P.O. Box 151, Livermore, CA 94551	Online grader and standards-based assessment tools used by teachers. Webcam based scanning of student completed scantrons and printing of those sheets.	Mastery Connect	Student school id number, name, submitted multiple choice answers to a student assessment, teacher name, IP address, browser type, language type, access time, and device identifier.	USA
<b>TextHelp, Inc. (Texthelp Ltd.)</b> 500 Unicorn Park Drive, 4th Floor, Woburn, MA 01801 USA Data Privacy & Security - Lucas Exchange, 1 Orchard Way, Greystone Road, Antrim, Northern Ireland. BT41 2RU	Cloud based, language and literacy support toolbar used in Mastery Connect to provide text-to-speech services.	Mastery Connect	This Vendor only processes the text contained in an assessment to perform text-to-speech services for end-users. No other end-user data is processed or stored by this Vendor.	USA
<b>Elevate Services (Elevate Data Sync, Elevate Standards Alignment)</b>				



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<b>Fonticons, Inc.</b> (FontAwesome) 307 S Main St, Bentonville, Arkansas 72712 USA	SaaS based web icon library provider.	Elevate Services	Services end-user IP address, and font icon files used (via FontAwesome Content Delivery Network).	USA
<b>Google, LLC</b> (Google Cloud) 1600 Amphitheatre Parkway Mountain View, CA 94043 USA	Used for the user interface with Google Classroom. Provides a user friendly way of configuring data integration. Customers who are not using Google Classroom are not affected by this.	Elevate Services	Any data contained in a Student Information System file provided by the institution for processing by Elevate Services.	USA
<b>Parchment Services (Parchment Award, Parchment Receive, Parchment Recruit, Transcript Services, Verification Services, Diploma Services, Comprehensive Learner Record Services, Diploma Services, Digital Badge Services, District Records Management. Digitary Services: Digitary Core Cloud Platform, Learner Portal, Digitary Badges, Digitary VIA, Digitary Orders)</b>				
<b>IMS Technology Group (</b> Information Management & Securities, LLC) 4720 E Liberty St, Mexico, MO 65265 USA	Digitization of paper credentials services.	Parchment Services	All Customer Data contained in a credential.	USA
<b>Intuit MailChimp</b>	Email services.	Parchment Services	First name, last name,	USA

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Vendor	Description of the Processing	Services	Data Processed	Processing Location
405 N Angier Ave. NE, Atlanta, GA 30308 USA			email address.	
<b>SumoLogic, Inc.</b> 855 Main St., Suite 100 Redwood City, CA 94063 USA Via Mecenate 78/A 20138 Milano (MI) Italy	Log aggregation and analysis. My eEquals Log Aggregation and Analysis. MyCreds / MesCertif Log Aggregation and Analysis. Digitary CORE Log Aggregation and Analysis	Parchment Services Digitary Services	IP address, end-user ID.	USA Australia Canada EU
<b>Stefanini Group</b> 27100 W. 11 Mile Road, Southfield, MI 48034 USA	Learner support services	Parchment Services	All Customer Data in the Services.	USA
<b>Twilio (SendGrid)</b> US: 375 Beale Street, Suite 300, San Francisco, CA 94105 EU: 25-28 North Wall Quay, Dublin 1, Ireland	SMS Messaging and Emailing Services	Parchment Services Digitary Services	First name, last name, email address.	USA
<b>Portfolium</b>				

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Vendor	Description of the Processing	Services	Data Processed	Processing Location
<p><b>Cloudimage</b> (Scaleflex SAS) 53 Chemin du Beaugard, 38330 Saint-Nazaire-les-Eymes, France</p>	<p>Images and image URLs end users provide to Cloudimage for processing and delivery. Delivery Networks (CDNs) used by Cloudimage to deliver images to end users.</p>	<p>Portfolium</p>	<p>Services end-user IP addresses, URLs of sites visited with time stamps (with an associated IP address); Geographic location based upon IP address and location of CDN providers' server.</p>	<p>Canada France Singapore</p>
<p><b>Expected Behavior, LLC</b> (DocRaptor) 407 Fulton Street. Suite 103, Indianapolis, IN 46191 USA</p>	<p>Used to compile PDFs from HTML.( i.e., Program Assessment reports.)</p>	<p>Portfolium</p>	<p>Any information contained in the PDF file submitted by an end-user, and end-user IP address</p>	<p>USA</p>
<p><b>Filestack, Inc.</b> (Filepicker.io) 10801 N Mopac Expressway Building 1, Suite 100 Austin, TX, 78759 USA</p>	<p>File upload management software. provides an ability to upload files from Facebook, Dropbox, Instagram, Google Drive, Flickr, Skydrive, Evernote, Github, Picasa, Box, Alfresco, Gmail, FTP and WebDAV using a single dialog window. It automatically stores the uploaded images in Amazon</p>	<p>Portfolium</p>	<p>Any information contained in the file that is submitted by an Services end-user.</p>	<p>USA</p>

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	Simple Storage Service (S3) and generates a unique URL as soon as the end-user completes the uploading process.			
<b>HostedFTP</b> 100-52 Briethaupt Street, Kitchener, ON Canada N2H 5G5	File transfer protocol Vendor for Student Information System or data sync for Customers. <b>It is used for automatic imports, which is only used by North American Customers.</b> Instructure does not send data to this Vendor from Portfolium, but the end-users have this convenience feature that they can upload to FTP and then ask Instructure to import that content.	Portfolium	Any data contained in a Student Information System as directed by the applicable Customer.	USA
<b>J2 Martech Corp, (d/b/a Kickbox)</b> 2030 Main Street, Suite 500, Dallas, TX 75201 USA	Email verification service - real time email verification API. Data is only stored with this sub-processor for 90 days.	Portfolium	Services end-user data which includes IP address, email address, and date/time stamp.	USA

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Vendor	Description of the Processing	Services	Data Processed	Processing Location
<b>Rchilli, Inc.</b> 2603 Camino Ramon, Suite 272, San Ramon, CA, 94583, USA	Software-as-a-service resume parsing tool used to parse resume/CV data uploaded to Portfolium.	Portfolium	The Services end-user data processed includes IP address, timestamp, user key, file name, and parsing logs.	USA
<b>SmartyStreets LLC</b> d/b/a Smarty 2335 S State St #100, Provo, UT 84606 USA	Address verification API tool.	Portfolium	Services end-user address submitted to the Service.	USA
<b>LearnPlatform by Instructure</b>				
<b>Action Verb LLC</b> d/b/a Files.com 222 S Mill Ave, Suite 800, Tempe, AZ 85281 USA	This Vendor is used for secure file upload for the transfer of data files.	LearnPlatform	All data approved by the Customer to be processed.	USA
<b>HelpDocs Ltd</b> Suite 22651, Box 6945, London W1A 6US UK	This Vendor hosts the LearnPlatform help center ( <a href="https://learnplatform.helpdocs.io/">https://learnplatform.helpdocs.io/</a> ) The services are hosted in the USA. This Vendor only processes data related to the end-users of	LearnPlatform	IP address and cookie data.	USA

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Vendor	Description of the Processing	Services	Data Processed	Processing Location
	the Services. They do not process student data.			
<b>Qualtrics, LLC</b> One Clarendon Row, Dublin 2, Ireland 333 W River Park Drive, Provo, Utah 84604, USA	Used to collect survey information from school districts for research studies. This Vendor is only applicable if a Customer purchases research studies from Instructure.	LearnPlatform	Services end-user first and surname, email address, IP address, survey responses, school affiliation, geographic location, and cookie data.	USA
<b>Rollbar, Inc.</b> 548 Market St Suite #60587, San Francisco, 94104 CA USA	This Vendor is used for application monitoring for errors.	LearnPlatform	IP address and log event details.	USA
<b>SurveyMonkey, Inc.</b> 910 Park Pl, Suite 300, San Mateo, CA 94403 USA Ella House, Suite 40.4, 40 Merrion Square East Dublin 2, D02 NP96 Ireland	Used to collect survey information from school districts for research studies. This Vendor is only applicable if a Customer purchases research studies from Instructure.	LearnPlatform	Services end-user first and surname, email address, IP address, survey responses, school affiliation, geographic location, and cookie data.	USA

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Vendor	Description of the Processing	Services	Data Processed	Processing Location
<b>StataCorp LLC</b> 4905 Lakeway Drive, College Station, Texas 77845-4512 USA	This Vendor provides statistical software used to perform statistics as part of the research services.	LearnPlatform	All data approved by the Customer to be processed.	USA
<b>Twilio, Inc. (Sendgrid)</b> US: 375 Beale Street, Suite 300, San Francisco, CA 94105 EU: 25-28 North Wall Quay, Dublin 1, Ireland	This Vendor provides business to business email service.	LearnPlatform	Name, email address, IP address, and email messages.	USA
<b>Validity, Inc. (RightVerify)</b> 100 Summer Street, Suite 2900, Boston, MA 02110 USA The Charter Building Uxbridge, UB8 1JG London EC4R 3TTV UK	Email verification services for business to business email addresses.	LearnPlatform	Name, email address, IP address, and email messages.	USA
<b>Scribbles Services (K-12 Records Management, K-12 Enrollment and Choice, ScribOrder, ScribTransfer, ScribTransfer, ScribTransfer, ScribPreK, ScribChoice, ScribEnroll)</b>				

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<b>Manybrain LLC</b> (Mailinator) 317 S. Division Street #198, Ann Arbor, MI 48104 USA	Email testing service.	Scribbles Services	Email address	USA
<b>SorryApp LTD</b> Mclarens, Penhurst House, 352-6 Battersea Park Road, London 3W11 3BY UK	Services status page located at <a href="https://status.scribsoft.com/">https://status.scribsoft.com/</a> .	Scribbles Services	IP address, cookie data, browser data, site usage data, online navigation data, location data.	USA
<b>Twilio (SendGrid)</b> US: 375 Beale Street, Suite 300, San Francisco, CA 94105 EU: 25-28 North Wall Quay, Dublin 1, Ireland	Email services.	Scribbles Services	Name, email address, IP address, and email messages.	USA
<b>Intelligent Insights</b>				



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Vendor	Description of the Processing	Services	Data Processed	Processing Location
<b>Doowii, Inc.</b> 2000 Central Avenue, Boulder, CO 80301 USA	Artificial intelligence software used for analytics specifically Instructure Intelligent Insights. This Service must be purchased separately by the Customer.	Intelligent Insights	All Customer Data stored in Data Access Platform.	Australia Canada Germany Singapore USA

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### Reseller Services Sub-processors

These Vendors provide certain services and products that are resold by Instructure to our Customers. These Vendors are only applicable to Customers that purchase these specific services from Instructure.

Vendor	Description of the Processing	Services	Data Processed	Processing Location
<p><b>Class Technologies Inc.</b> 1717 N Street, NW, Suite 1 Washington, D.C. 20036 USA</p>	<p>This Vendor provides certain services that are resold by Instructure.</p>	<p>Class for Zoom (SaaS) Class for Microsoft Teams (SaaS) Class Storage (cloud storage for recordings &amp; playback) Class Standard Support Service Class Standard Training Service Class Standard Implementation Class Premium Support Service Class Premium Training Service Class Premium</p>	<p>Data include personal data from education or employment records. Among the types of Personal Data that this Application collects, by itself or through third parties, there are: Cookies (including Google Analytics); Usage Data; first name; last name; school/company name; address; state; email address; website, IP address. Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.</p>	<p>Australia Canada Germany Singapore USA</p>

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		Custom Consulting Services		
<p><b>Drieam BV</b> Don Boscostraat 4, 5611KW Eindhoven the Netherlands</p>	<p>This Vendor provides certain services that are resold by Instructure.</p> <p><b>StudyCoach</b> is a coaching tool where the student and their coach are provided with cross-curricular insights into their own learning activities and results.</p> <p><b>EduFrame</b> is a SIS and online eCommerce platform for continuing education.</p> <p><b>Portflow</b> is an LTI plug-in for learning management systems. Students use this tool to make their developmental progress visible and accountable under their control by collecting evidence, asking for feedback from instructors, peers, and experts and creating an assessment file. Instructors can</p>	<p>Eduframe StudyCoach Portflow</p>	<p><b>EduFrame</b> collects certain information from end-users, including first and last names, email and mailing addresses, and passwords when creating an account for network login purposes, cookie analytics data (e.g., Google Analytics). Drieam may also retain certain information on your behalf, such as files and messages stored within your account. <b>StudyCoach</b> stores and processes the following: first and last name, email, role, sis-id and lms-id. It is possible for the administrator at the institution to disclose more data. Drieam may also retain certain information on your behalf, such as files and messages stored within the end-users Canvas LMS account.</p>	<p>Ireland</p>

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	provide students with scaffolding in this process.		<b>Portflow:</b> collects certain information from users, including first and last names, email addresses, role, sis-id and lms-id. Additionally, when inviting external users to a portfolio, this Vendor uses and discloses the e-mail address of the external user for identification purposes. They also retain certain information on the end-user's behalf, such as files and messages stored within the end-user's account.	
<b>FeedbackFruits, B.V.</b> Danzigerkade 17, 1013 AP, Amsterdam, the Netherlands	Instructure resells this Vendor's services. This Vendor provides all support and implementation services for its products.	Teaching & Learning System	Cookie data includes IP address, cookie ID; preferences; Identity Data includes LMS user id, first name, last name, username or similar identifier, job title and gender; Contact Data includes email address and telephone number; Technical Data includes internet protocol (IP) address, your login data, browser type and version, time	Australia Canada Europe USA

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			zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices used to access their services; Usage Data includes information about how the use of their, products and services.	
<p><b>eLumen, Inc.</b>            1300 Godward            St NE Suite            3850,            Minneapolis, MN            55413 USA</p>	<p>Insights by eLumen for Canvas Outcomes is a powerful suite of tools within the Canvas LMS that enables higher education institutions to turn Canvas into a comprehensive assessment platform. Insights expands the functionality of Canvas Outcomes with integrated curriculum mapping, assessment planning, as well as learner record (CLR) and micro-credential support. With Insights, institutions can manage a range of assessment processes, from program and institutional accreditation to competency-based education.</p>	<p>Insights by eLumen</p>	<p>Badge issuing information, institution name, country code, email address, institution address, institution role, phone number, user name, password, assessment responses, course results, submitted content, SIS user ID, messages, IP address, Canvas LMS user name, Canvas LMS SSO credentials</p>	<p>Australia            USA            Singapore</p>

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	Faculty and coordinators benefit from real-time data displayed on dynamic, interactive dashboards that allow them to track student progress, measure outcomes, and improve teaching and learning – all without ever leaving Canvas LMS.			
<b>IntelliBoard, Inc.</b> 20 Aspetuck Ln Monroe, CT, 06468-5204 USA	IntelliBoard is a learning analytics platform unifying data through Canvas LMS and selected data sources (i.e. Banner). IntelliBoard analyzes and presents data from the client’s current fiscal and calendar (School/Organization). IntelliBoard offers machine learning predictive analytics allowing the individual client to build and train their own predictive models based on historical data of their courses and learners. All clients are subject to the IntelliBoard Terms of Use.	IntelliBoard Learning Analytics Platform	All Canvas LMS data as directed by the Customer. Cookie data including usage data Institution address; company/organization name; email address; first name; last name; state; website	USA
<b>KickUp, Inc.</b>	This Vendor provides certain	Kickup	Services end-user name, email	USA

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<p>2093 Philadelphia Pike #2920, Claymont, DE 19703 USA</p>	<p>services that are resold by Instructure for Customers located in the USA that are K-12 institutions.</p>	<p>Foundations Kickup Learning Kickup Growth</p>	<p>address, IP address, device information, browser type, language preferences, referring URLs, device name, location, cookie data, web beacons, and flash objects.</p>	
<p><b>K-16 Solutions</b> Skysong Innovation Ctr Ste 1951-1475 N Scottsdale Rd Scottsdale, AZ, 85257 USA</p>	<p>This Vendor provides certain services that are resold by Instructure.</p>	<p>Scaffold DataX, Scaffold Archive, Scaffold Migration, and Scaffold AI Detection services</p>	<p>These services include all Customer Data stored in a Canvas LMS instance.</p>	<p>USA</p>
<p><b>Visiarc AB</b> PO Box 244, S-581-02 LINKÖPING, Sweden</p>	<p>This Vendor provides Smartsearch LTI as a product that is resold by Instructure. When a Canvas LMS user does a search the Smartsearch server relays the search results from Canvas LMS to the users web browser using the LTI standard and OAuth2. Smartsearch is a search tool that can search Announcements, Assignments, Calendar, Courses, Course</p>	<p>Smartsearch</p>	<p>When an end-user does a search the Smartsearch server relays the search results from Canvas LMS to the end-user's web browser using the LTI standard and OAuth2. The database stores end-user data: User Identity, Institution, Last Accessed Time, Access Counter, User Role, Access Token, Refresh Token. (These three data items are anonymous strings and are</p>	<p>Europe USA</p>

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	Syllabus, Discussions, Files, Modules, Module Sub-Headers, Pages, People, Quizzes, and Submissions.		<p>encrypted. Data are decrypted when used by the RAM. The decryption key also exists in the RAM but is not stored in AWS.)</p> <p>The user identity is an encrypted unique key for an end-user within an institution. The user identity is used to map an end-user launching the LTI app to a user in the database, and the ability to retrieve the user's access token in order to fetch the search data requested.</p> <p>The database holds an encrypted access token that is used for fetching data from the Canvas API on behalf of the end-user. Following the Canvas authentication (OAuth2) standard the access token is generated only after authorization by the end-user launching Smartsearch the very first time. The access token is scoped to only GETdata from the Canvas API. The access</p>	
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			<p>token can at any time be disabled by the user and thus the access token stored by Smartsearch will be rendered useless.</p> <p>The database stores an encrypted refresh token for updating the access token once it has expired, after approximately one hour.</p> <p>Following the Canvas authentication (OAuth2) standard the refresh token is generated only after the authorization by the end-user launching Smartsearch the first time. The refresh token can at any time be disabled by the end-user and thus the refresh token stored by Smartsearch will be rendered useless.</p>	
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### Analytics Services Processors

These Vendors only have access to Customer Data to the extent necessary for Instructure to perform product analytics in our Services. These Vendors help Instructure improve the performance of our Services, collect end-user feedback, and test new functionality in our Services.

Vendor	Description of the Processing	Services	Data Processed	Processing Location(s)
<b>Heap, Inc.</b> 53 Beach St, 6th Floor, New York, NY 10013 USA	Product analytics tools for Services session users. Only used for US-hosted customers.	All Services	End-user IP address, and in application click stream data.	USA
<b>FullStory, Inc.</b> 1745 Peachtree St NE Suite N, Atlanta, GA 30309 USA	Product analytics tool for 0.5% of Services session users. Only used for US-hosted customers.	Quottly Services	End-user IP address, and in application click stream data.	USA
<b>Google Analytics</b> 1600 Amphitheater Way, Mountain View, CA USA	Product analytics tools for Services session users.	Parchment Services	End-user IP address, and in application click stream data.	USA

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<b>Pendo.io, Inc.</b> 301 Hillsborough St, Raleigh, NC 27603	Product analytics tools for Services session users.	All Services	End-user IP address and in application click stream data.	Australia Canada Germany Ireland Singapore USA
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### Instructure Group Sub-Processors:

Instructure may use the following subsidiaries to process customer data and may be acting as Sub-processors in the delivery of the Services. Instructure’s processing locations include: UK, EU, Brazil, Australia, Singapore, New Zealand, South Africa, Egypt, Jordan, India, Philippines, and USA.

- Instructure, Inc. – USA
- Instructure Global Limited – United Kingdom
- Instructure Hungary Kft – Hungary
- Instructure Netherlands B.V. – the Netherlands
- Instructure Sweden AB – Sweden
- Instructure Australia Pty Ltd – Australia
- Instructure Brazil Ltda – Brazil
- Instructure Hong Kong Limited – Hong Kong Island
- Instructure Mexico, S. de R.L. – México
- Instructure Singapore Pte. Ltd. – Singapore
- Instructure Philippines Inc. – Philippines
- Parchment LLC – USA
- Digitary Pty Ltd – Melbourne, Australia

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- Framework Computer Consultants Limited – Dublin, Ireland
- Digitary Canada, Inc. – Vancouver, Canada
- Digitary UK Limited – United Kingdom
- Plaid Bidco Limited – Ireland
- Scribbles Software, LLC – USA
- EasySoft Software International BV – the Netherlands
- LearnPlatform, Inc. – USA