

# Totara Learning Sub-Processors

**Last Updated:** 3 March 2026

To help deliver and support our products, Totara Learning (Europe) Limited (“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](mailto:privacy@totara.com).

- **Sub-processors (General Purpose) - Used for general business operations and non-product purposes**
- **Sub-processors (Product) - Associated with a core product provided by Totara**

## Sub-Processors (General Purpose)

### Infrastructure Sub-Processors

Name	Data Location	Purpose	Security Measures	Categories of Data	Applicable Service
<b>Amazon Web Services</b>	United States; UK, EU	Cloud Service Provider	<a href="#">AWS Compliance Programs</a>	Customer account information needed for product and service provisioning.	Totara Community
<b>Cloudflare, Inc.</b>	US	WAF (Web Application Firewall)	<a href="#">Cloudflare Trust Hub</a>	Any Personal Data processed in Customer Logs, such as IP addresses,	Totara.com & Totara Community
<b>OpenAI</b>	US	AI models in support of Totara's AI-powered features	<a href="#">OpenAI Security and Privacy</a>	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
<b>HubSpot</b>	US	Marketing automation tool and analytics	<a href="#">HubSpot Trust Hub</a>	Business contact details (name, title, email, company, industry, phone)	Totara Customers, Partners, & Prospects
<b>LinkedIn</b>	US & Canada	Analytics and advertising	<a href="#">LinkedIn Privacy Information</a>	Business contact details (name, email, company)	Totara Customers, Partners, & Prospects
<b>Nooks Communications, Inc.</b>	US	AI Enabled Sales Dialing Assistant	<a href="#">Nooks Privacy Policy</a>	Business contact details (name, email, phone number, company)	Totara Customers, Partners, & Prospects
<b>Cognism</b>	EU	Business lead platform	<a href="#">Cognism Security</a>	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	<a href="#">Google Privacy Policy</a>	Aggregated website usage data, IPs, user-agent	Visitors to Totara.com, Community, & Subscription Portal
Microsoft Clarity	US	User experience (UX) analytics	<a href="#">Microsoft Clarity Data Privacy and Security</a>	Website interaction data, IP addresses	Totara Partner Portal users
Canny	US	Product Feedback	<a href="#">Canny Security</a>	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	<a href="#">Sage Trust and Security</a>	Business contact and billing information	Totara Customer & Partners
Breezy HR	US	Recruitment and applicant tracking	<a href="#">Privacy Controls</a>	Applicant data, resumes, contact info	Totara Job Applicants
DocuSign, Inc.	US	Electronic signatures	<a href="#">DocuSign Trust Center</a>	Names, email addresses of signatories	Totara Customer, Partners, Job Applicants
Syncari	US	CRM and marketing data unification	<a href="#">Syncari Trust Center</a>	Business metadata across CRM and marketing platforms	Totara Customer, Partners, Job Applicants
Microsoft	US	Corporate communication, storage, and productivity tools (O365)	<a href="#">Microsoft Trust Center</a>	Email, documents, chat logs, collaboration data	Totara Internal Operations

## Support Services

Name	Data Location	Purpose	Security Measures	Categories of Data	Applicable Service
Chatbase Inc.	US	AI Chat Agent	<a href="#">Trust and Security at Chatbase</a>	Any personal data submitted in chat requests	Totara Cloud Platform
Document 360	UK	Help Centre / Knowledge Base	<a href="#">Privacy Policy</a>	Support content, FAQs, potentially user-submitted questions or feedback	totara.help
Atlassian Pty Ltd	Global (All Atlassian cloud across AWS regions)	Support ticket management	<a href="#">Atlassian Trust Center</a>	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)	Germany (EU)	Support ticket management and AI chatbot to assist in ticket management	<a href="#">freshworks Trust Center</a>	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 under Art. 27 GDPR for entities outside the EU/EEA	<a href="#">EDPO ISO 27001 Certification</a>	Contact details of data subjects and supervisory authorities (where inquiries or data requests are managed)	Applicable to all Totara services offered to data 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

## Sub-Processors (Totara Products)

### Infrastructure & Product Functionality Sub-Processors

Name	Data Location	Purpose	Security Measures	Categories of Data
<b>Amazon Web Services</b>	London, United Kingdom  Sydney, Australia  Virginia, United States  (Customers are given the choice of the above locations)	Hosting services include compute, storage, backups and other services to support customer site operations	<a href="#">AWS Compliance Programs</a>	Customer account information needed for product and service provisioning.
<b>Google, LLC</b>	Sydney, Australia	For Cloud customers using the Totara Mobile App only:  Google Firebase is used to process Push Notifications	<a href="#">Google Firebase Privacy and Security</a>	Chat Message Notification, SMS Message Notification, PBX (Phone Call) Message Notification
<b>Google, LLC</b>	US	Product usage data is collected by anonymising data and sending this to the Google Analytics service.	<a href="#">Google Privacy Policy</a>	Aggregated website usage data, IPs, user-agent
<b>Workato, Inc.</b>	US	<b>(Optional)</b> Features are available that use Workato as middleware. Workato will only be a processor for sites with these features enabled.	<a href="#">Workato Security</a>	Data passed through connectors (metadata, contact info, workflow payloads)
<b>OpenAI, LLC</b>	US	<b>(Optional)</b> Features are available that use AI models in support of Totara's AI-powered features. <a href="#">Totara AI features FAQs</a>	<a href="#">OpenAI Security and Privacy</a>	Customer Personal Data created by customer and stored in Totara Community

## Support Services

Name	Data Location	Purpose	Security Measures	Categories of Data
HubSpot	US	Customer Relationship Management	<a href="#">HubSpot Trust Hub</a>	Business contact details (name, title, email, company, industry, phone)
Document 360	UK	Help Centre / Knowledge Base	<a href="#">Privacy Policy</a>	Support content, FAQs, potentially user-submitted questions or feedback
Atlassian Pty Ltd	Global (All Atlassian cloud across AWS regions)	Support ticket management	<a href="#">Atlassian Trust Center</a>	Contact information (e.g., Name, e-mail) and any personal data submitted in support requests
FreshWorks Inc. (FreshDesk, FreshDesk Freddy)	Germany (EU)	Support ticket management and AI chatbot to assist in ticket management	<a href="#">freshworks Trust Center</a>	Contact information (e.g., Name, e-mail) and any personal data submitted in support requests
Microsoft	US	Corporate communication, storage, and productivity tools (O365)	<a href="#">Microsoft Trust Center</a>	Email, documents, chat logs, collaboration data
EDPO	Belgium (EU)	Acts as EU representative under Art. 27 GDPR for entities outside the EU/EEA	<a href="#">EDPO ISO 27001 Certification</a>	Contact details of data subjects and supervisory authorities (where inquiries or data requests are managed)

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