

Instructure Third-party Service Provider Guide

Last Updated: 04 July 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 (collectively “**Customer(s)**”). For a full list and description of our Services please visit <https://www.instructure.com/products>. 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 applicable 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](#). Where the engagement of a sub-

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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](#), 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 [here](#), and the EduApp Center [here](#).

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.

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- 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.

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)
Amazon Web Services	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
Amazon CloudFront	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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Cloudflare, Inc.	<p>Used by Impact for edge caching and content delivery network for Impact’s backend applications.</p> <p>Used for translations in Canvas LMS if enabled by Customer in their instance.</p>	<p>Impact by Instructure</p> <p>Canvas LMS</p>	<p>End-user IP address, system configuration information, end-user activity in the Service.</p> <p>Any information in the web UI that is translated.</p>	<p>Global - Nearest edge server to the end-user.</p> <p>Germany Netherlands USA</p>
Ping Identity Corporation	<p>Ping1 Advanced Identity is used across all Services as identity management services for unified login functionality.</p> <p>NOTE: This functionality will be part of the Services in the 4th quarter of 2024.</p>	All Services	<p>End-user ID, email, login credentials (password), organization (e.g. end-user’s school).</p> <p>IAM data and technical information (such as access privileges and access criteria, access log information)</p> <p>Online and technical data (IP address, device ID and related data, connection data)</p>	<p>Australia Canada Germany Singapore USA</p>
New Relic, Inc.	Software-as-a-service metrics and alerting application performance monitoring	Elevate Services	Application and infrastructure log data including end-user IP	USA

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			address	
Solarwinds (AppOptics & Pingdom)	Application monitoring and logging.	Data Sync Elevate Canvas Credentials Canvas Badges Portfolium	End-user IP address, application actions (i.e., page clicks), and application user id.	USA
Splunk, Inc.	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 Ireland Singapore USA

Services Sub-processors

Instructure uses these Vendors to support our Services.

Vendor	Description of the Processing	Services	Data Processed	Processing Location
Khoros, LLC	Website hosting provider for Instructure Community website at https://community.canvaslms.com/ . This Vendor is only applicable if the Customer or their end-users register their user accounts with	All Services	When an end-user links their Services account to the Community website, this Vendor processes Name, email address, IP address, and cookie data.	USA

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Vendor	Description of the Processing	Services	Data Processed	Processing Location
	the Community Website.		Optional biographical information: avatar image or photo, education information, blog comments, product questions, biography information, job title, and personal web page.	
Canvas Services (Canvas LMS, Canvas Studio, Canvas Conferences, Canvas Commons, Canvas Credentials, Canvas Badges)				
Apple, Inc.	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. US Customers Only.	Canvas LMS	Any Customer Data stored in an iWork file.	USA
Blindside Networks Inc.	Hosting provider for Canvas Conferencing services (Big Blue Button). This Vendor is only applicable if the Customer uses Big Blue Button or Canvas Conferences.	Canvas Conferences	End-user first and last name, Canvas user ID, and avatar image. During a live meeting end-users may exchange audio, video, slides, desktop, chat, and emoji icons,	Australia Canada Ireland USA

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Vendor	Description of the Processing	Services	Data Processed	Processing Location
			<p>responses to polls, closed captioning, and whiteboard annotations, and other content during a session (“Meeting Data”). Storage of the Meeting Data depends on whether (a) the meeting was recorded, and (b) whether the moderator marked meeting segments for later recording for playback. There are three cases for the storage of Meeting Data: (i) For an unrecorded meeting, no Meeting Data is stored on the Vendor server upon meeting conclusion. (ii) Recording meetings without Start/Stop record marks, Vendor stores the Meeting Data (defined below) on their servers for 14 days (after which it is automatically</p>	

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Vendor	Description of the Processing	Services	Data Processed	Processing Location
			deleted). (iii) Recorded meeting with Start/Stop record marks, Vendor will store Meeting Data on their servers for 14 days (after which it is automatically deleted). Vendor also compresses the Meeting Data and uploads it to its servers where it is processed into a recording that can be later viewed in the Services. Vendor stores user statistics for the session (“Meeting Statistics”). Meeting Statistics are used by moderator to measure participation in the meeting which includes: end-user name, isModerator (true/false), number of times chatted, number of times talked, number of times shared emoji, number of times raised hand, response	

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Vendor	Description of the Processing	Services	Data Processed	Processing Location
			to polls, Total time talking, total time in session, join date/time, and leave date/time.	
Clearout.io (Glitz Blitz Promotions Pvt. Ltd.)	This Vendor provides email validation services for badge confirmation email addresses. Note: this Vendor is only used for US-based customers.	Canvas Credentials Canvas Badges	End-user email address.	USA
Doowii, Inc.	Artificial intelligence software used for analytics specifically Instructure Intelligent Insights. This Service must be purchased separately by the Customer.	Canvas LMS	All Customer Data stored in Data Access Platform which is described at https://data-access-platform-api.s3.eu-central-1.amazonaws.com/tables/catalog.html .	Australia Canada Germany Singapore USA
hotglue	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	Canvas Catalog	End-user email, name, and any custom data that has been defined by the Customer.	Australia Canada Germany Ireland Singapore USA

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Vendor	Description of the Processing	Services	Data Processed	Processing Location
	integration is an opt-in feature by the Customer.			
Khan Academy	This Vendor provides certain free services for educators that are available through Canvas LMS via an LTI link. NOTE: USA only	Canvas LMS		USA
Looker (Google Cloud)	Software-as-a-service data visualization product that provides visualization services for in-application analytics including New Analytics and Administrator Analytics. These analytic tools are used by Customers to analyze certain activities by their end-users. NOTE: New Analytics only uses Looker if a Customer enables the Online Attendance feature.	Canvas LMS	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).	Australia Canada Germany Ireland Singapore USA

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Vendor	Description of the Processing	Services	Data Processed	Processing Location
Lucid Software, Inc.	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.	Canvas LMS	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.	USA
MongoDB, Inc. (MongoDB Atlas)	Private cloud hosting provider located in Instructure's Amazon Web Services instance.	Canvas Credentials Canvas Badges	Storage of badge metadata including end-user name, email address, and badge information.	Australia Canada Ireland Singapore USA
Respondus, Inc.	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.	Canvas LMS Mastery Connect	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	USA

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Vendor	Description of the Processing	Services	Data Processed	Processing Location
			from the LMS) and the reason provided by the user for early termination.	
Sisense Ltd.	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.	Canvas LMS, Professional Services	All Canvas LMS data.	USA
Snowflake, Inc.	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.	Canvas LMS, Professional Services	All Canvas LMS data.	USA

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Vendor	Description of the Processing	Services	Data Processed	Processing Location
TurnItIn, LLC.	Optional Plagiarism checker tool. As determined by the Institution, this Vendor can be used as an LTI or 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.	Canvas LMS, Portfolium, Canvas Student ePortfolios	End-user information which includes course ID, course title, role, email address, name, Canvas LMS user ID, IP address, and institution name	USA
Mastery Connect Services				
Accusoft (PrizmDocCloud)	Document conversion to PDF.	Mastery Connect	Any data contained in the document to be converted.	USA
Chameleon Intelligent Tech Inc.	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, email address, name).	USA

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Vendor	Description of the Processing	Services	Data Processed	Processing Location
GradeCam, LLC	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
TextHelp, Inc. (Texthelp Ltd.)	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
Services: Elevate Services (Elevate Data Sync, Elevate Standards Alignment, Elevate K-12 Analytics)				
Fonticons, Inc. (FontAwesome)	SaaS based web icon library provider.	Elevate Services	Services end-user IP address, and font icon files used (via FontAwesome Content Delivery Network).	USA

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Vendor	Description of the Processing	Services	Data Processed	Processing Location
Google, LLC (Google Cloud)	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
Portfolium				
Cloudimage (Scaleflex SAS)	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.	Portfolium	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.	Canada France Singapore
Expected Behavior, LLC (DocRaptor)	Used to compile PDFs from HTML.(i.e., Program Assessment reports.)	Portfolium	Any information contained in the PDF file submitted by an end-user, and end-user IP address	USA

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Vendor	Description of the Processing	Services	Data Processed	Processing Location
Filestack, Inc. (Filepicker.io)	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 Simple Storage Service (S3) and generates a unique URL as soon as the end-user completes the uploading process.	Portfolium	Any information contained in the file that is submitted by an Services end-user.	USA
HostedFTP	File transfer protocol Vendor for Student Information System or data sync for Customers. It is used for automatic imports, which is only used by North American Customers. 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	Portfolium	Any data contained in a Student Information System as directed by the applicable Customer.	USA

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Vendor	Description of the Processing	Services	Data Processed	Processing Location
	ask Instructure to import that content.			
J2 Martech Corp, (d/b/a Kickbox)	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
SmartyStreets LLC d/b/a Smarty	Address verification API tool.	Portfolium	Services end-user address submitted to the Service.	USA
Rchilli, Inc.	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
LearnPlatform by Instructure				
Action Verb LLC d/b/a Files.com	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

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Vendor	Description of the Processing	Services	Data Processed	Processing Location
HelpDocs Ltd	Software provider that hosts the LearnPlatform help center (https://learnplatform.helpdocs.io/) The services are hosted in the USA. This Vendor only processes data related to the end-users of the Services. They do not process student data.	LearnPlatform	IP address and cookie data.	USA
Qualtrics, LLC	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
Rollbar, Inc.	This Vendor is used for application monitoring for errors.	LearnPlatform	IP address and log event details.	USA
SurveyMonkey	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
StataCorp LLC	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
Twilio, Inc. (Sendgrid)	This Vendor provides business to business email service.	LearnPlatform	Name, email address, IP address, and email messages.	USA
Validity, Inc. (RightVerify)	Email verification services for business-to-business email addresses.	LearnPlatform	Name, email address, IP address, and email messages.	USA

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
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<p>Class Technologies Inc.</p>	<p>This Vendor provides certain services that are resold by Instructure. See: https://trust.class.com/, https://www.class.com/privacy-policy/</p>	<p>Class for Zoom (SaaS) Class for Microsoft Teams (SaaS) Class Storage (cloud storage for recordings & playback) Class Standard Support Service Class Standard Training Service Class Standard Implementation Class Premium Support Service Class Premium Training Service Class Premium Custom Consulting Services</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>
<p>Drieam BV</p>	<p>This Vendor provides certain services that are resold by Instructure.</p>	<p>Eduframe StudyCoach Portflow</p>	<p>EduFrame collects certain information from end-users, including first and last names,</p>	<p>Ireland</p>

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	<p>StudyCoach 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>EduFrame is a SIS and online eCommerce platform for continuing education.</p> <p>Portflow 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 provide students with scaffolding in this process.</p> <p>Subprocessor list is available at: https://drieam.com/en/security-and-privacy/</p>		<p>email and mailing addresses, and passwords when creating an account for network login purposes. When ordering services via Eduframe we may collect your name, organization name, billing & shipping information, and payment details. Drieam may also retain certain information on your behalf, such as files and messages stored within your account.</p> <p>StudyCoach 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>Portflow collects certain information from users, including first and last names, email addresses, role, sis-id and lms-id. Additionally, when inviting</p>	
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			external users to a portfolio, this Vendor uses and disclose 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.	
FeedbackFruits, BV	Instructure resells this Vendor's services. This Vendor provides all support and implementation services for its products.		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 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	Australia Canada Europe USA

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			and services.	
KickUp, Inc.	This Vendor provides certain services that are resold by Instructure for Customers located in the USA that are K-12 institutions.	Kickup Foundations Kickup Learning Kickup Growth	Services end-user name, email address, IP address, device information, browser type, language preferences, referring URLs, device name, location, cookie data, web beacons, and flash objects.	USA
K-16 Solutions	This Vendor provides certain services that are resold by Instructure.	Scaffold DataX, Scaffold Archive, Scaffold Migration, and Scaffold AI Detection services	These services include all Customer Data stored in a Canvas LMS instance.	USA
Visiarc AB	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	Smartsearch	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. Smartsearch can search announcements, assignments,	Europe USA

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	<p>browser using the LTI standard and OAuth2. Smartsearch is a search tool that can search Announcements, Assignments, Calendar, Courses, Course Syllabus, Discussions, Files, Modules, Module Sub-Headers, Pages, People, Quizzes, and Submissions.</p>		<p>Calendar, courses, course syllabus, discussions, Files, Modules, Module Sub-Headers, Pages, People, Quizzes, and Submissions.</p> <p>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 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</p>	
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			<p>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 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 Sub-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)
Heap, Inc.	Product analytics tools for Services session users. Only used in the USA for US-based customers.	All Services	End-user IP address, and in application click stream data.	USA
FullStory, Inc.	Product analytics tool for 0.5% of Services session users. Only used in the USA for US-based customers.	All Services	End-user IP address, and in application click stream data.	USA

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 related to customer support, account management, implementation, engineering, security, and professional services.

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Instructure's employee processing locations include: UK, EU, Brazil, Australia, Singapore, New Zealand, South Africa, Egypt, Jordan, India, Philippines, and USA.

- Instructure, Inc. - 6330 S 3000 E, Suite 700, Salt Lake City, Utah 84121, USA
- Instructure Global Limited – Birchin Court, 5th Floor, 19-25 Birch Lane, London, EC3V 9DU, United Kingdom
- Instructure Hungary Kft –1112 Budapest, Balatoni ut 1/a 8.em 1112, Hungary, Europe
- Instructure Netherlands B.V. – Care of Baker Mckenzie, Strawinskylaan 411, 1077XX Amsterdam, the Netherlands
- Instructure Sweden AB – Care of Intertrust Sweden AB, Box 16285, 103 25 Stockholm, Sweden
- Instructure Australia Pty Ltd – Baker McKenzie Level 19, 181 William Street, Melbourne VIC 3000
- Instructure Brazil Ltda – Av. Bernardino de Campos no. 98, 14th Floor, 04.004-040 Paraíso, São Paulo/SP Brazil
- Instructure Hong Kong Limited – 21/F, City Plaza 3, 14 Taikoo Wan Road, Quarry Bay, Hong Kong Island
- Instructure Mexico, S. de R.L. de C.V. – Periférico Sur 4338, Colonia Jardines del Pedregal de San Ángel, Delegación Coyoacán, C.P. 04500, Ciudad de México
- Instructure Singapore Pte. Ltd. – 150 Beach Road, #35-00, Gateway West, Singapore
- Instructure Philippines Inc. – 12/F., Times Plaza Building, United Nations Avenue corner Taft Avenue, Ermita, 1000 Manila, Philippines

Instructure Subsidiary Sub-processor Lists

- Digital Sub-processors: <https://www.digitary.net/subprocessors/>
- Parchment Sub-processors: <https://www.parchment.com/resources/trust/subprocessors/>