Appendix 2: Subprocessors

The Processor uses selected technical service providers as sub-processors in accordance with Art. 28 (2) and (4) GDPR to provide and operate the contractual service. These providers are chosen based on strict data protection and security requirements.

Whenever possible, the processing of personal data takes place exclusively within the **European Union or the European Economic Area (EU/EEA)**. If providers located outside the EU are used, the Processor ensures that processing occurs only in compliance with the requirements of **Chapter V GDPR**, based on appropriate safeguards (e.g., Standard Contractual Clauses or an adequacy decision).

All sub-processors are bound by **data processing agreements pursuant to Art. 28 GDPR** and may only process personal data based on documented instructions from the Processor. The use of data for their own purposes—particularly for training or analytics outside the scope of the contracted service—is excluded unless explicitly stated.

The following overview lists the sub-processors used, their processing location, and the purpose of the processing. This transparency enables Controllers to assess the employed technical service providers.

Name of the subprocessor	**Place of processing**	**Service provided by the subprocessor**
Amazon Web Services EMEA SARL 38 Avenue John F. Kennedy L-1855 Luxembourg	EU – operation in AWS Region **eu-central-1 (Frankfurt)**. Processing takes place exclusively in data centers within the European Union.	**Service Provided** Provision of technical cloud infrastructure for hosting and operating the Profilery web application, including storage and processing of data arising from usage. AWS provides infrastructure services including: • Compute capacity • Data storage • Network and security services Data is processed exclusively for the provision of the platform. **Data Protection** AWS processes data solely on behalf of and according to the Processor's instructions, based on the current AWS Service Terms and AWS Data Processing Addendum. Access from third countries does not occur without appropriate safeguards according to Chapter V GDPR.

Name of the subprocessor	**Place of processing**	**Service provided by the subprocessor**
Microsoft Ireland Operations Limited One Microsoft Place South County Business Park Leopardstown Dublin 18, Irland	EU – use of the **Microsoft EU Data Boundary**. Processing occurs exclusively within the European Union.	**Service Provided** Provision, operation, and maintenance of cloud infrastructure and AI-based services (Microsoft Foundry / Azure-based AI services) supporting specific platform features. Processing activities include: • Processing of input data (prompts / text inputs) • Generation of structured output data • Temporary processing required to deliver the AI functionality **Data Protection** Processing is carried out solely to provide the requested functionality. Microsoft does **not** use processed data to train its own AI models. Processing is based exclusively on the Microsoft Data Protection Addendum.

Name of the subprocessor	**Place of processing**	**Service provided by the subprocessor**
CARBONEIO SAS 130 La Sauvagère 85170 Bellevigny Frankreich	EU – processing in data centers located within the European Union.	**Service Provided** Technical conversion of documents into structured data formats (e.g., PDF, Microsoft Word, or other machine-readable formats) to enable further processing within the platform. Processing is strictly limited to **technical format conversion**. **Data Protection** • Processing is purely technical and automated • Data is **not stored permanently** • Processing occurs **only temporarily** during the conversion process • No content analysis or use for own purposes takes place

Name of the subprocessor	**Place of processing**	**Service provided by the subprocessor**
Functional Software, Inc. Sentry 45 Fremont Street, 8th Floor San Francisco, CA 94105 USA	EU – processing occurs exclusively in **EU data centers**.	**Service Provided** Monitoring the technical stability and security of the platform and analyzing technical errors. Only technical diagnostic information is processed, such as: • Error messages • System events • Technical metadata **Data Protection** • **No transfer of application content data** • Only **pseudonymized error and diagnostic data** is processed • IP addresses are shortened or anonymized • Provider is certified under the **EU-US Data Privacy Framework (DPF)**

Name of the subprocessor	**Place of processing**	**Service provided by the subprocessor**
widdix GmbH Blumenstr. 17/1 73669 Lichtenwald	Germany (EU).	**Service Provided** Automated virus and malware scanning of documents uploaded by users (e.g., certificates) to ensure IT security. **Data Protection** • Files are processed solely for the purpose of security scanning • Processing is automated • Files are **automatically deleted** after scanning • No storage or use for other purposes

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