

ANNEX 3

SUB-PROCESSORS, PROCESSING LOCATIONS AND THIRD-COUNTRY TRANSFERS

Convenience translation. Only the German version is legally binding.

1) Principle

For processing on behalf, the Processor uses the sub-processors listed below. They are contractually bound to obligations under Art. 28(4) GDPR. The regions stated are permitted; the regions currently used are indicated.

Part A: Sub-processors

Convex, Inc., 444 De Haro Street, San Francisco, CA 94107, USA

Purpose: database, file storage and backend of the service; user accounts, cases, documents, portal access credentials.

Location: AWS region eu-west-1 (Dublin, Ireland), including backups.

Third-country transfer: based in the USA; access from the USA for operations and support is possible.

Basis: data processing agreement with Convex, EU Standard Contractual Clauses (Implementing Decision (EU) 2021/914), and the EU-U.S. Data Privacy Framework where applicable.

Vercel Inc., 440 N. Barranca Ave #4133, Covina, CA 91723, USA

Purpose: server functions of the service (API connection, form filling, portal automation) and delivery of the website.

Location: functions in region fra1 (Frankfurt am Main). Permitted: Vercel regions within the EU (currently also dub1 Dublin, cdg1 Paris, arn1 Stockholm), DPA Clause 12.2. Requests reach the functions through Vercel's edge network at the nearest location.

Third-country transfer: based in the USA; operating and log data may be processed in the USA. Basis: data processing agreement with Vercel, EU Standard Contractual Clauses, EU-U.S. Data Privacy Framework.

Requesty Ltd, 71–75 Shelton Street, Covent Garden, London WC2H 9JQ, United Kingdom

Purpose: routing AI processing to the model providers under Part B.

Location: exclusively the EU endpoint router.eu.requesty.ai in Frankfurt am Main (AWS eu-central-1).

Requesty does not store request or response content (zero data retention).

Third-country transfer: based in the United Kingdom; an adequacy decision of the European Commission applies to the United Kingdom. Otherwise, basis: data processing agreement with Requesty.

Plus Five Five, Inc. (Resend), 2261 Market Street #5039, San Francisco, CA 94114, USA

Purpose: sending and receiving email in the course of case processing.

Location: sent from Ireland (eu-west-1); stored in the USA.

Third-country transfer: yes. Basis: Resend's Data Processing Addendum with EU Standard Contractual Clauses, and the EU-U.S. Data Privacy Framework.

Microsoft Ireland Operations Limited, One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland

Purpose: email (Microsoft 365). Receiving cases and documents that customers send by email, and staff email correspondence about cases.

Location: data centres in the EU (EU Data Boundary).

Third-country transfer: access from third countries is possible. Basis: Microsoft Products and Services Data Protection Addendum with EU Standard Contractual Clauses, and the EU-U.S. Data Privacy Framework.

Part B: AI model providers (further sub-processors via Requesty)

Requesty forwards requests only to model deployments operated in data centres within the European Union whose providers neither store the data beyond processing nor use it for training. This is enforced by policy at the EU endpoint; requests to any other model are rejected. Currently used: Google Cloud EMEA Limited (Vertex AI, europe-west1 and EU multi-region) and Microsoft Ireland Operations Limited (Azure OpenAI, Sweden Central). Requesty publishes the full list of providers connected through it at requesty.ai/privacy/subprocessors; the Processor gives notice of changes to the providers used in accordance with Clause 8.2.

- **Google Cloud EMEA Limited**, 70 Sir John Rogerson's Quay, Dublin 2, Ireland: Vertex AI. Permitted: Google Cloud regions within the EU. Currently used: europe-west1 (Belgium) and EU multi-region; text recognition from documents, case chat.
- **Microsoft Ireland Operations Limited**, address see above: Azure OpenAI. Permitted: Azure regions within the EU. Currently used: Sweden Central (Sweden); mapping, enrichment, form filling, portal automation.
- **Amazon Web Services EMEA SARL**, 38 Avenue John F. Kennedy, L-1855 Luxembourg: Amazon Bedrock. Permitted: AWS regions within the EU. Currently not used in the standard flow.

Third-country transfer: the providers are companies based in the EU with US parent companies; access from the USA for operations and support cannot be excluded. Basis: the providers' data protection agreements with EU Standard Contractual Clauses, and the EU-U.S. Data Privacy Framework where applicable.

Part C: Enterprise EU processing (on request)

The Controller may request that its case data be processed under the Enterprise plan. Remuneration and the specifically named model deployments are set out in an individual agreement. The following then applies bindingly to AI processing:

1. Dedicated access: AI processing for the Controller runs through a dedicated API key used only for the Controller at Requesty's EU endpoint, with a fixed policy. Requesty processes these requests exclusively in Frankfurt am Main (AWS eu-central-1).
2. No storage: zero data retention is enforced server-side for this key. Request and response content is neither logged nor cached at Requesty; model deployments without zero data retention are excluded.
3. Fixed model list: only the model deployments named in the individual agreement (provider, model, EU region) are used. The endpoint rejects requests to other models or regions.
4. Consent instead of objection: changes to items 1 to 3 are made only with the Controller's prior consent in text form; Clause 8.2 of the DPA does not apply in this respect.
5. Evidence: the Processor records the model deployment used for each case and processing step and provides the Controller with an extract on request.

Database and file storage (Convex, Ireland), server functions (Vercel, EU) and email (Resend, Microsoft) remain as in Part A. Enterprise EU processing concerns AI processing.

Part D: Not sub-processors

Grid operators, metering point operators and registers to which a case is submitted process the data they receive as independent controllers. Stripe Payments Europe, Limited processes the Controller's payment and billing data for the purchase of credits; Stripe does not receive case data. Website usage analytics is not part of the processing on behalf and is described in the privacy policy.

Part E: Changes

Changes are governed by Clause 8.2 of the DPA. Version of this annex: 28 September 2026.

Berlin, 28 September 2026

WISNOTS GmbH