

Permitted sub-processors

1.1 The table below sets out the list of permitted sub-processors that process Avvoka data as part of the use of the Software.

Sub-processor	Scope of processing	Type of Personal Data processed	Location	Nature of transfer	Legal basis of transfer outside EEA
Datacentre providers					
OVH Limited , a UK registered company number with registered number 05519821, whose registered office address is at Chambre De Commerce Française De Grande Bretagne, Lincoln House, 300 High Holborn, London, WC1V 7JH and its group companies OVH US LLC, with office at 11480 Commerce Park Dr Ste 500 Reston, VA, 20191-1556 United States; OVH Groupe SA with office at 537 407 926 RCS Lille Métropole, 2 rue Kellermann, 59100 Roubaix, France; OVH HEBERGEMENT INC with office at 1801 McGill College Ave., Suite 800, Montreal, Quebec H3A 2N4, Canada.	The sub-processor provides the London servers on which the Personal Data is kept for Customers that have elected for this data centre location in writing to the Provider prior to the Effective Date	Any Personal Data that is provided by the Customer to the Provider pursuant to this Agreement, along with user email addresses and names	London, England (primary site) Roubaix, France (backup site) Germany USA, Vint Hill, Virginia (primary site) USA, Hillsboro, Oregon (backup site). Canada, Beauharnois, Quebec (primary site) Canada, Cambridge, Ontario (backup site)	The Personal Data set out in column 3 will be transferred automatically by the Provider to this Sub-Processor. Access to the application installed on OVH.com (including API access) is via the web and is secured and encrypted using HTTPS. The Provider's documents are also stored and encrypted at rest using AES – 256-bit encryption	DPF certification where an EEA-based data subject uses the software hosted in the US location

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Amazon Web Services Inc , a company registered in the State of Washington, whose registered office address is at 410 Terry Avenue North Seattle, WA 98109 United States.	The sub-processor provides the US-based servers on which the Personal Data is kept for Customers that have elected for this data centre location in writing to the Provider prior to the Effective Date	Any Personal Data that is provided by the Customer to the Provider pursuant to this Agreement, along with user email addresses and names	East Coast, The United States	The Personal Data set out in column 3 will be transferred automatically by the Provider to this Sub-Processor. Access to the application installed on aws.com (including API access) is via the web and is secured and encrypted using HTTPS. The Provider's documents are also stored and encrypted at rest using AES – 256 bit encryption	DPF certification, where an EEA-based data subject uses the Software hosted in this region
Amazon Web Services Australia Pty Ltd , a company registered in Australia, whose registered office address is at L37 2-26 Park St Sydney, New South Wales, 2000 Australia	The sub-processor provides the Australia-based servers on which the Personal Data is kept for Customers that have elected for this data centre location in writing to the Provider prior to the Effective Date	Any Personal Data that is provided by the Customer to the Provider pursuant to this Agreement, along with user email addresses and names	Sydney, Australia	The Personal Data set out in column 3 will be transferred automatically by the Provider to this Sub-Processor. Access to the application installed on aws.com (including API access) is via the web and is secured and encrypted using HTTPS. The Provider's documents are also stored and encrypted at rest using AES – 256 bit encryption	Model Clauses, where an EEA-based data subject uses the Software hosted in this region
Webchat provider					

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Intercom R&D Unlimited Company , an Irish company with registered company number 538158, whose registered office is at 2 nd Floor, Stephen Court, 18-21 St. Stephen's Green, Dublin 2, Republic of Ireland and its group company Intercom, Inc., a Delaware corporation with offices at 55 2 nd Street, 4 th Fl., San Francisco, CA 94105, USA.	The sub-processor provides software that facilitates in-browser customer support	Email address and location data	USA	The Personal Data set out in column 3 will be transferred automatically by the Provider to this Sub-Processor. Access to the intercom platform is via the web and encrypted using HTTPS. User information is encrypted using AES – 256-bit encryption	DPF certification
Mailserver provider					
Twilio Inc. , of 101 Spear St FL 5, San Francisco, CA 94105, United States.	The sub-processor provides mail server software	Email address data only	West Coast, USA Frankfurt, Germany, Dublin, Ireland, with options also available in Amsterdam, Netherlands.	The Personal Data set out in column 3 will be transferred automatically by the Provider to this Sub-Processor. Access is via the web. Twilio encrypts all data in transit.	DPF certification
AI providers					
Microsoft Corporation , One Microsoft Way, Redmond, Washington 98052, USA and	The sub-processor provides deployment of	Document user and data	USA Ireland	The Personal Data set out in column 3 will be transferred only if customer signs up for	DPF certification

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its group company Microsoft Ireland Operations Limited, Attn: Chief Data Officer, One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland.	Avvoka AI feature-set (OpenAI base models)	(including personal)		Avvoka AI features. Interactions with the base model deployed via Azure are logically isolated and secured employing technical measures including but not limited to transport encryption of TLS1.2 or higher, compute security perimeter, tokenization of text, and exclusive access to allocated GPU memory.	
Anthropic Ireland , 6th Floor, South Bank House, Barrow Street. Dublin 4, D04 TR29.	The sub-processor provides AI model integration (Claude)	Document and user data (including personal)	Ireland	The Personal Data set out in column 3 will be transferred only if customer signs up for Avvoka AI features. Avvoka opts out of all retention periods beyond the initial send / receive of data by the AI model.	N/A
Meta Platforms, Inc. , 1 Hacker Way Menlo Park, CA 94025 United States.	The sub-processor provides AI model integration (Llama)	Document and user data (including personal)	USA	The Personal Data set out in column 3 will be transferred only if customer signs up for Avvoka AI features. Avvoka opts out of all retention periods beyond the initial send / receive of data by the AI model.	DPF certification for transfers from EU and Switzerland; Model Clauses for transfers from UK

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Google LLC , 1600 Amphitheatre Parkway, Mountain View, California 94043, United States.	The sub-processor provides AI model hosting, including, Gemini, Anthropic and OpenAI	Document and user data (including personal)	USA Europe	The Personal Data set out in column 3 will be transferred only if customer signs up for Avvoka AI features. Avvoka opts out of all retention periods beyond the initial send / receive of data by the AI model.	DPF certification