

## Sub-Processors of the Netigate Group

Effective from 01.01.2025 for new agreements,  
from 01.03.2025 for existing agreements

The following companies are, directly or indirectly, engaged to deliver Netigate's Services and thus are processing Customer data and/or personal data as defined in the GDPR. We indicate below when a sub-processor is used only for a particular service or license. A formal, written data processing agreement (DPA) is in place with all companies outside the Netigate group that act as sub-processors.

In case of third-country transfers as defined under the GDPR, if an adequacy decision is not in place for the destination country, then the approved transfer mechanism is the latest standard contractual clauses (SCCs) published by the EU Commission. These transfer mechanisms are in place as a precautionary safeguard to ensure continued compliance, although current operations maintain data processing within the EU/EEA.

Name	Data location(s)	Function(s)	Data category	Additional info
<b>Aiven Oy (Ltd)</b> Antinkatu 1, 6th floor, 00100 Helsinki, Finland Reg. No. 2795743-5	Germany	Managed Services such as Event Streaming platform and DB	Event data. May include personal data and customer data.	<a href="#">Link to DPA</a>
<b>Amazon Web Services EMEA SARL (AWS Europe)</b> 38 Avenue John F. Kennedy, L-1855 Luxemburg	Germany	Server hosting services of Netigate (Data Center operations)	Survey Data: may include Personal Data and Customer Data. Specific to each customer implementation. No Personal Data by default.	<a href="#">Link to DPA</a>  Not standard: only for customers who order Netigate Feedback Custom Solutions / Order Page
<b>Cleura AB</b> Blekingegatan 1, SE-37157 Karlskrona, Sweden Reg. No. 556630-7806	Sweden and/or Germany (depending on configuration)	Server hosting services of Netigate platform. (Data Center operations) (i.e. Services hosted under www.ntgt.de)	Survey Data: may include personal data and Customer data	<a href="#">Link to DPA</a>  Not standard: only for customers who specifically choose Cleura's Germany-based storage
<b>CloudAMQP by 84codes AB</b> Torsgatan 26 113 21 Stockholm, Sweden Reg. No. 556898-0782	Within EU/EEA	RabbitMQ, Message queue for evening the load to API	User details, feedback and related background variables that is stored in Netigate CX or Lumoa (may include personal data and customer data)	<a href="#">Link to DPA</a> <a href="#">Link to TOMs</a>  Lumoa platform only
<b>Cloudflare, Inc.</b> 701 Townsend St., San Francisco, CA 94107 United States	Within EU/EEA (configured within the tool)	Web application security, firewalls, API rate limiting and content delivery network services	Web traffic data: may include personal data (User agent, end-user IP address, browser and operating system details)	<a href="#">Link to DPA</a> <a href="#">Link to GDPR info</a>  Lumoa platform only
<b>Enuvo GmbH</b> Huobstrasse 10 8808 Pfäffikon SZ Switzerland	Within EU/EEA	Digital survey solution	Survey Data: may include personal data and Customer data	Not standard: Only for specific customers by agreement
<b>Intercom R&amp;D Unlimited</b> 2nd Floor Stephen Court 18-21 St. Stephen's Green DUBLIN, 2 Ireland Reg. no. IE 3273393E H	Within EU/EEA	In-product onboarding, product announcements, tailored support and notifications	Distribution Data: may include personal data (username, email, IP address) and Customer data  No other storage or tracking of information from end-customers or feedback	<a href="#">Link to DPA</a> <a href="#">Link to Trust Center</a>
<b>Mailgun Technologies Inc.</b> San Antonio HQ 112 E Pecan St, #1135 San Antonio, TX, 78205, United States	Within EU/EEA	Messaging services (e-mail distribution) eg reports and event notifications to end-users	Distribution Data: may include personal data (email) and Customer data	<a href="#">Link to DPA</a>
<b>Mailjet GmbH</b> Alt-Moabit 2, 10557 Berlin, Germany	Germany	Messaging services (e-mail distribution) eg reports and event notifications to end-	Distribution Data: may include personal data and Customer data	<a href="#">Link to DPA</a>  Recipient email address pseudonymised

**Netigate AB**, Drottninggatan 25, 111 51, Stockholm, Sweden | org.nr: 556576-0997

**Netigate Deutschland GmbH**, Untermainkai 27-28, 60329 Frankfurt am Main, Handelsregister: Amtsgericht Frankfurt am Main | HRB 112492

**Netigate Norge AS**, Edvard Storms gate 2, 0166 Oslo, Norway | Org nr: 995 053 861

**Lumoa Oy**, Hermannin Rantatie 8, 00580 Helsinki, Finland | FI27917978 VAT reg

		users		Encryption & data minimisation
<b>Make.com and Integromat by Celonis Inc</b> 87th floor, New York, NY 10007, United States	Within EU/EEA	Pulling feedback and support contact data from various sources and feeding data back to customer systems	Survey data, public reviews, support contacts: may include personal data and customer data	<a href="#">Link to DPA</a> <a href="#">Link to TOMs</a>  Usage control, Access control Data encrypted at-rest  Not standard: only for customers to whom integration is implemented by Netigate / Lumoame
<b>Microsoft Azure Microsoft Ireland Operations Ltd</b> One Microsoft Place South County Business Park, Leopardstown, Dublin D18 P521, Ireland Reg. No. IE 8256796 U	Within EU/EEA	Server and app hosting services of platforms (data center operations), translator text API, Azure OpenAI Service / Cognitive Services, Azure Speech to text transcription (i.e. services hosted under <a href="http://www.netigate.se">www.netigate.se</a> and/or <a href="http://act.lumoame.me">act.lumoame.me</a> )	Survey data: may include personal data and customer data	<a href="#">Link to DPA</a>  Text API: personal data masked and deleted after processing.  No data used for training OpenAI models. Data is stored for limited period for content and abuse monitoring. <a href="#">Link Open AI FAQ</a>  Speech models: no input/output data retained after completed translation request. <a href="#">AI Speech FAQ</a>
<b>MONGODB Ltd</b> Building #2, 1 Ballsbridge, Dublin 4, Ireland Reg. No. IE 9793087 U	Within EU/EEA	MongoDB is run within Microsoft Azure, so data is hosted in the same location and with same logic as Microsoft services. No Mongo personnel have access to data stored	User details, feedback and related background variables that is stored in Netigate CX or Lumoa (may include personal data and customer data)	<a href="#">Link to DPA</a> <a href="#">Link to TOMs</a>
<b>Sinch Sweden AB</b> Lindhagensgatan 74 112 18 Stockholm Sweden Reg. No. 556747-5495	Sweden	Messaging Services (SMS distribution)	Distribution data: may include personal data and customer data	<a href="#">Link to DPA</a>
<b>UpCloud Oy</b> Aleksanterinkatu 15 B, 00100 Helsinki, Finland Reg. No. 2431560-5	Germany	Data at-rest back-up from server hosting services of Netigate platform (Data Center operations)	Survey Data: may include personal data and Customer data	<a href="#">Link to DPA</a> Not standard: only for customers who specifically select this Germany-based cloud storage
<b>Wiraya Solutions AB</b> Slöjdgatan 9, 111 57 Stockholm, Sweden Reg. No. 556764-5071	Sweden	Messaging Services (SMS distribution)	Distribution data: may include personal data and customer data	<a href="#">Link to GDPR FAQ</a>
Netigate EU Group companies: <b>Netigate AB</b> (Sweden) <b>Netigate Deutschland GmbH</b> (Germany) <b>Netigate Norge AS</b> (Norway) <b>Lumoame Oy</b> (Finland)	Sweden Germany Norway Finland	Netigate services Lumoame services		

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