

## 5. Personal data sub-processors, data locations, and hosting providers

Function	Hosting provider	Entity names	Physical location	Additional information / Security and Privacy descriptions
<b>Primary hosting location</b>	Microsoft Azure	Microsoft Ireland Operations Limited	Netherlands (Azure West Europe)	<a href="https://www.microsoft.com/en-us/trustcenter/cloudservices/azure">https://www.microsoft.com/en-us/trustcenter/cloudservices/azure</a>  Customer data (including personal data) that customer uploads to the service
<b>Secondary hosting location</b>	Microsoft Azure	Microsoft Ireland Operations Limited	Ireland	<a href="https://www.microsoft.com/en-us/trustcenter/cloudservices/azure">https://www.microsoft.com/en-us/trustcenter/cloudservices/azure</a>  In case of disaster recovery case customer data is replicated to the secondary location
<b>Off-site backups</b>	Amazon AWS	Amazon Web Services EMEA SARL	Ireland (eu-west-1)	<a href="https://aws.amazon.com/security/">https://aws.amazon.com/security/</a>  Alternative location for off-site backups. No active processing takes place. Used only in case of disaster recovery.
<b>Integrations (optional)</b>	MuleSoft Inc. (Amazon AWS)	Amazon Web Services EMEA SARL	Ireland (eu-west-1) Frankfurt (eu-central-1)	<a href="https://aws.amazon.com/security/">https://aws.amazon.com/security/</a>  Enables the integrations between different third-party systems and Sympa opted by customer. Through integrations, customer data flows from/to Sympa and third-party systems. All data is encrypted securely.
<b>24/7 Service monitoring and Cloud Infrastructure support service</b>	Elisa Managed Cloud	Elisa Oyj	Finland	<a href="https://elisa.com/">https://elisa.com/</a>  Provides managed cloud services and in controlled situations (e.g. possible incident situations) access to Sympa's databases can be granted.
<b>24/7 Security Operations Center</b>	Elisa	Elisa Cybersecurity	Finland	<a href="https://elisa.com/corporate/">https://elisa.com/corporate/</a>  Provides data security services (SOC/SIEM) and processes system logs which may in certain cases contain personal data (IP address, user name)
<b>Email provider</b>	Mailjet	Mailjet SAS	Germany, Belgium	<a href="https://www.mailjet.com/">https://www.mailjet.com/</a>  Used to send email messages to the customers (contains email addresses).
<b>ATS main infrastructure (optional)</b>	Google Cloud Platform	Google Ireland Limited and its sub-processors	Frankfurt (europa-west3)	<a href="https://cloud.google.com/terms/subprocessors">https://cloud.google.com/terms/subprocessors</a>

<b>ATS file storage (optional)</b>	Amazon AWS	Amazon Web Services EMEA SARL and its sub-processors	Frankfurt (eu-central-1)	<a href="https://aws.amazon.com/security/">https://aws.amazon.com/security/</a>
<b>ATS video technology (optional)</b>	Ziggeo (Amazon AWS)	Ziggeo, Inc. and its sub-processors	Ireland (eu-west-1)	<a href="https://ziggeo.com/privacy">https://ziggeo.com/privacy</a> <a href="https://aws.amazon.com/security/">https://aws.amazon.com/security/</a>
<b>ATS Document parsing into machine-readable data (optional)</b>	Textkernel (no storage or data at rest)	Textkernel B.V. and its sub-processors	Amsterdam (no storage or data at rest)	<a href="https://www.textkernel.com/data-privacy-and-security-at-textkernel/">https://www.textkernel.com/data-privacy-and-security-at-textkernel/</a>
<b>LMS Main Hosting (optional)</b>	Microsoft Azure	Microsoft Corporation and subsidiary corporations	Guaranteed within EU	<a href="https://learn.microsoft.com/en-us/azure/compliance/offerings/offering-eu-cloud-coc">https://learn.microsoft.com/en-us/azure/compliance/offerings/offering-eu-cloud-coc</a>
<b>Sympa eSign / embedded electronic signature functionality (optional)</b>	Scrive eSign	Scrive AB	EU/EEA. Core hosting: Ireland/Germany; backups: Germany; notifications: EU/EEA; optional eID: selected provider.	Scrive AB acts as Sympa's sub-processor for Sympa eSign. Scrive provides embedded electronic signature functionality, including signing workflow, audit trail, evidence material, document sealing, notifications, optional eID services, support, maintenance and security. Scrive may use further sub-processors. Current eSign sub-processors and detailed data locations are set out in Scrive DPA Enclosure - Scrive eSign, Annex II (available in the Embedded Functionality Appendix or on request). Certain eID providers may act as independent controllers. <a href="#">Scrive GDPR information</a> .
<b>Sympa AI / Focus AI functionality (optional)</b>	Microsoft Azure OpenAI Service / Microsoft Azure	Microsoft Ireland Operations Limited and Microsoft subprocessors disclosed in Microsoft's Online Services Subprocessor List	EU/EEA / Microsoft EU Data Boundary; specific Azure region or EU Data Zone to be described in Sympa Trust Centre / Service Description	Provides AI technology used for Sympa AI / Focus AI, including interpretation of user prompts and generation of structured search instructions. Customer HR records, Focus AI prompts and Focus AI outputs are not used by Sympa or Microsoft Azure OpenAI to train, fine-tune or improve AI models. Further information: <a href="https://learn.microsoft.com/en-us/azure/foundry/responsible-ai/openai/data-privacy">https://learn.microsoft.com/en-us/azure/foundry/responsible-ai/openai/data-privacy</a> ; <a href="https://www.microsoft.com/en-us/trust-center/privacy/european-data-boundary-eudb">https://www.microsoft.com/en-us/trust-center/privacy/european-data-boundary-eudb</a> ; <a href="https://www.microsoft.com/en-us/trust-center/privacy/data-access">https://www.microsoft.com/en-us/trust-center/privacy/data-access</a> ; <a href="https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA">https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA</a> ; <a href="https://www.sympa.com/about/trust-centre">https://www.sympa.com/about/trust-centre</a>