

List of Subprocessors pursuant to Art. 28(2) GDPR

Last updated: 19 November 2025

This list contains the subprocessors engaged by **SoftBCom Berlin GmbH** for the operation of the **QAWacht SaaS platform**.

1. Hetzner Online GmbH

- **Address:** Industriestr. 25, 91710 Gunzenhausen, Germany
- **Service:** Hosting of SaaS infrastructure
- **Data types:** All personal data processed within QAWacht
- **Location of processing:** Germany/EU
- **Legal basis for transfer:** Not applicable (processing within EU/EEA)

2. Stripe Payments Europe, Ltd.

- **Address:** 1 Grand Canal Street Lower, Dublin 2, Ireland
- **Service:** Payment processing and invoicing
- **Data types:** Customer account data (name, email, company details, billing information)
- **Location of processing:** EU and US
- **Legal basis for third-country transfer:** EU Standard Contractual Clauses / EU-US Data Privacy Framework

3. HubSpot, Inc.

- **Address:** 25 First Street, Cambridge, MA 02141, USA
- **Service:** CRM and marketing automation (lead capture, forms, webinar registrations)
- **Data types:** Contact details (name, email, company), communication data
- **Location of processing:** US/EU
- **Legal basis for third-country transfer:** EU Standard Contractual Clauses / EU-US Data Privacy Framework

4. OpenAI Ireland Ltd.

- **Address:** 1st Floor, The Liffey Trust Centre, 117–126 Sheriff Street Upper, Dublin 1, D01 YC43, Ireland

- **Service:** Processing of conversation data for AI-powered speech analysis, transcription and scoring, operated within the EU entity
- **Data types:** Conversation transcripts, text inputs, metadata (processed in accordance with agreed data minimization and anonymization measures)
- **Location of processing:** EU (Ireland)
- **Legal basis for processing and transfer:** Processing within the EU under Art. 28 GDPR; any onward transfer outside the EEA—if technically required—is covered by **EU Standard Contractual Clauses** pursuant to Art. 46 GDPR

5. OpenAI, L.L.C.

- **Address:** 3180 18th Street, San Francisco, CA 94110, USA
- **Service:** Processing of conversation transcripts for AI-powered speech analysis (LLM)
- **Data types:** Conversation transcripts, including personal data where present; anonymization or pseudonymization applied where technically feasible
- **Location of processing:** US
- **Legal basis for third-country transfer:** EU Standard Contractual Clauses (Art. 46 GDPR)

6. RunPod, Inc.

- **Address:** 651 N. Broad Street, Suite 206, Middletown, DE 19709, USA
- **Service:** GPU cloud infrastructure for AI model execution and processing
- **Data types:** Anonymized or pseudonymized datasets used for model computation (no raw customer billing or CRM data)
- **Location of processing:** US (with distributed cloud infrastructure)
- **Legal basis for third-country transfer:** Standard Contractual Clauses pursuant to Art. 46 GDPR

For inquiries or objections regarding the engagement of individual subprocessors, please contact:

contactsbc@softbcom.com

Additional subprocessors may be added in the future and will be announced in advance in accordance with the DPA provisions.