

## List of Subprocessors and Service Providers (including subprocessors pursuant to Art. 28(2) GDPR)

Last updated: 21 April 2026

This list contains subprocessors and service providers engaged by SoftBCom Berlin GmbH in connection with the provision, support and commercial operation of its services, including **QAWacht, SoftBCom AI Agents, SoftBCom Contact Center, SoftBCom Service Desk, SoftBCom Managed Outbound, SoftBCom WFM** and other SoftBCom services.

The entities listed below may be used depending on the product, enabled features, customer configuration and regional setup. Not every entity is used for every customer or every service.

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### 1. Hetzner Online GmbH

- **Address:** Industriestr. 25, 91710 Gunzenhausen, Germany
- **Service:** Hosting of SaaS infrastructure
- **Relevant product(s):** QAWacht; SoftBCom AI Agents; SoftBCom Contact Center, SoftBCom Service Desk, SoftBCom Managed Outbound and SoftBCom WFM.
- **Data types:** Personal data processed within the hosted application environment, including customer account data, service data, stored files, logs and related metadata
- **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, billing and invoicing
- **Relevant product(s):** QAWacht; SoftBCom AI Agents
- **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, including lead capture, forms, webinar registrations and customer communication management
- **Relevant product(s):** QAWacht; SoftBCom AI Agents; SoftBCom Contact Center, SoftBCom Service Desk, SoftBCom Managed Outbound and SoftBCom WFM.
- **Data types:** Contact details (name, email, company), communication data and related customer relationship 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:** LLM-based processing, including analysis, classification, summarization and generation of text outputs, operated via the EU entity
- **Relevant product(s):** QAWacht; SoftBCom AI Agents
- **Data types:** Conversation transcripts, text inputs, prompts, metadata and related structured or unstructured content processed in connection with the enabled service functionality
- **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:** LLM-based processing, including analysis, classification, summarization and generation of text outputs
- **Relevant product(s):** QAWacht; SoftBCom AI Agents
- **Data types:** Conversation transcripts, text inputs, prompts, metadata and related structured or unstructured content, 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 pursuant to Art. 46 GDPR

#### 6. Voximplant, Inc.

- **Address:** 150 West 25th Street, RM 403 New York City, NY 10001, USA
- **Service:** Cloud communications infrastructure, including telephony, voice routing and real-time communication services
- **Relevant product(s):** SoftBCom AI Agents
- **Data types:** Call audio, signaling data, call metadata, phone numbers, routing information, transcripts and related communication content where applicable
- **Location of processing:** Depending on service routing and configuration
- **Legal basis for third-country transfer:** EU Standard Contractual Clauses and/or other applicable safeguards

#### 7. Eleven Labs Inc.

- **Address:** 169 Madison Ave #2484, New York, NY 10016, USA
- **Service:** Speech synthesis and voice generation services
- **Relevant product(s):** SoftBCom AI Agents
- **Data types:** Text inputs for speech generation, generated audio outputs, voice configuration data, related metadata and, where applicable, limited conversational content submitted for synthesis
- **Location of processing:** US
- **Legal basis for third-country transfer:** EU Standard Contractual Clauses and/or other applicable safeguards

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

**contactsbc@softbcom.com**

Additional subprocessors or service providers may be added in the future and, where required, will be notified in advance in accordance with the applicable contractual provisions.