

Salviminda

Sabisu Consulting BV · S-Link

Sub-processor List

Sabisu Consulting BV — Salviminda / S-Link

v1.1 (Draft) · 20 September 2026

DRAFT — PENDING LEGAL REVIEW

In force since 30 September 2026. This list is maintained by Sabisu Consulting BV and forms part of the Data Processing Agreement it concludes with each client.

This document sets out the sub-processors currently engaged by Sabisu Consulting BV (trading as Salviminda) in the provision of the S-Link Peppol e-invoicing service. It is maintained in accordance with Article 28(2) and (4) of the GDPR and forms part of the Data Processing Agreement between Salviminda and its clients.

Clients who have granted general written authorisation for sub-processing are notified of any intended addition or replacement at least 30 days in advance, and may object within that period. Where a client objects on reasonable data-protection grounds, Salviminda will work with the client to find an alternative; if none can be found, either party may terminate the affected part of the service in accordance with the client agreement.

This list is consistent with, and should be read together with, the Salviminda Privacy Notice, the Information Security Policy and the Intellectual Property & Data Protection Policy.

Current sub-processors

Sub-processor	Legal entity and location	Purpose	Data processed	Transfer safeguard	Status
Microsoft Azure / Microsoft 365	Microsoft Ireland Operations Ltd, Ireland. Hosting region: Azure West Europe (Netherlands).	Cloud infrastructure for S-Link Hub: compute, database hosting, encrypted storage, logging and backup. Microsoft 365 for internal e-mail and document storage.	All personal data processed in the Service, including full business-document content held in S-Link Hub.	Within the EU. Microsoft Products and Services Data Protection Addendum (Art. 28 DPA); EU Data Boundary commitments.	Active
B2BRouter	B2BRouter Global SL (formerly Invinet Sistemas 2003 SL), Av. Diagonal 433, Barcelona, Spain — NIF B63276174.	Primary Peppol access point and French accredited platform: receiving, validating, converting, transmitting and archiving electronic invoices.	Business-document content; sender and recipient identifiers; transmission metadata.	Within the EU (Spain). Art. 28 DPA; ISO/IEC 27001 certified.	Active
Freelance professionals engaged in the Philippines	Individual professionals contracted directly by Sabisu Consulting BV. Philippines. Named list available to clients on request.	Development and support work for S-Link and S-Link Hub, involving access to client environments and to data held in the Service.	All personal data processed in the Service, accessed on a need-to-know basis for the task at hand.	Third country without an adequacy decision. Standard Contractual Clauses (Implementing Decision (EU) 2021/914) with each individual; documented transfer impact assessment reviewed annually; named accounts, MFA, least-privilege and time-limited access; logging; no local storage of client data.	Active
Avalara	Avalara Europe Ltd, United Kingdom.	Secondary Peppol access point: an alternative transmission channel, used only where a client contracts for it.	Business-document content; sender and recipient identifiers.	United Kingdom. Covered by the European Commission adequacy decisions for the UK, renewed on 19 December 2025 and valid until 27 December 2031; Art. 28 DPA.	Planned — not yet active

Notes

Scope of this list. It covers processors engaged by Salviminda that process client personal data on Salviminda's behalf. It does not list recipients that act as controllers in their own right, or platforms to which transmission is required by law — see the note on Chorus Pro below. Professional advisers bound by professional confidentiality (accountants, auditors, lawyers) are not sub-processors of the Service.

Freelance professionals in the Philippines. These individuals are contracted directly by Salviminda — without any labour broker, agency or intermediary — and work under Salviminda's authority and documented instructions, which means they may equally be characterised as persons acting under the processor's authority within the meaning of Art. 29 GDPR rather than as sub-processors. Salviminda lists them here in either case, so that clients have full visibility of who can access their data and from where, and can complete their own records of processing and transfer documentation. Data at rest is not replicated outside the European Union; access from the Philippines is remote access to EU-hosted systems.

Chorus Pro (French public sector). Where a client issues an invoice to a French public-sector body, transmission through Chorus Pro, operated by the Agence pour l'informatique financière de l'État (AIFE), is required by French law. Chorus Pro is the French State's platform for business-to-government invoicing; it is a recipient acting under a legal obligation and under public-sector data protection rules, not a sub-processor selected by Salviminda, and it is therefore not listed in the table above.

French business-to-business reform. France abandoned the plan for the public portal to exchange company invoices in October 2024; exchange now runs through accredited private platforms, and the DGFIP has acted as the Peppol Authority for France since July 2025. From 1 September 2026 all businesses established in France must be able to receive electronic invoices, with the obligation to issue them phased in thereafter. S-Link relies on B2Brouter's accreditation for this route.

Avalara — onboarding status. Avalara is not yet in use. It will be activated only where a client contracts for the secondary access point, and affected clients will be notified in advance in accordance with the 30-day notice described above.

Changes to this list. Clients are notified of intended changes at privacy@salviminda.com and may raise an objection to the same address. The current version of this list is available to clients and prospects on request.

Version history

Version	Date	Change description
v1.0	17 September 2026	Initial draft.
v1.1	20 September 2026	Corrected the legal entities: Sabisu Consulting BV, B2Brouter Global SL, and Avalara Europe Ltd (United Kingdom, adequacy decision in place of Standard Contractual Clauses). Named Microsoft Ireland Operations Ltd and the Azure West Europe region in place of the hosting placeholder. Added the freelance professionals engaged in the Philippines. Added a status column, an objection procedure and explanatory notes.