SALVIMINDA

Sub-processor List

Processors engaged by Salviminda in the delivery of the Services

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Current sub-processors

By signing the Data Processing Agreement, the Client grants general written authorisation to the sub-processors below. Salviminda notifies clients of any intended addition or replacement at least 30 days in advance, and a client may object on reasonable data-protection grounds within that period. Where an objection cannot be resolved by agreeing an alternative, either party may terminate the affected part of the service.

Sub-processor	Purpose	Location	Transfer safeguard	Status
Microsoft Ireland Operations Ltd	Cloud infrastructure for S-Link Hub: compute, database hosting, encrypted storage, logging and backup; Microsoft 365 for internal e-mail and document storage	European Union — Azure West Europe (Netherlands)	Within the EU. Microsoft Products and Services Data Protection Addendum (Art. 28); EU Data Boundary commitments	Active
B2Brouter Global SL, NIF B63276174, Barcelona	Peppol access point and French accredited platform: primary channel for transmission, conversion and archiving of business documents	European Union — Spain	Within the EU. Art. 28 DPA; ISO/IEC 27001 certified	Active
Base44 — platform on which Salviminda's internal applications are built and currently hosted	TicketHub, the internal support-ticket application, in which ticket text and attachments submitted by client users may contain personal data; and First Flow, Salviminda's internal CRM, which holds business contact details	United States, until migration — see Status	A data processing agreement incorporating the European Commission's Standard Contractual Clauses (Implementing Decision (EU) 2021/914), or reliance on the EU–US Data Privacy Framework where the provider is certified, is being concluded, and a transfer impact assessment documented. Client personal data is being	Active — being withdrawn by 31 January 2027

			withdrawn from the applications in the meantime. Salviminda is redeploying both applications to its own Microsoft Azure environment in the European Union, by 31 January 2027. In the redeployed environment the data is reachable only through the applications themselves, and administrative access to the environment is restricted to system administrators located in the European Union. On completion no personal data is held on the platform provider's infrastructure and the provider ceases to act as a sub-processor	
Freelance professionals engaged directly by Salviminda	Development and support work for the Services, involving remote access to client environments and to data held in S-Link Hub	Philippines (remote access to EU-hosted systems)	Standard Contractual Clauses (Implementing Decision (EU) 2021/914) with each individual; documented transfer impact assessment reviewed annually; named individual accounts, MFA, role-based access control, logging of access; no local storage of client data. Row-level restriction of access by client company, removal of standing administrative database access with just-in-time elevation, EU-only support for clients with a contractual EU-only requirement, and development against synthetic data are being implemented	Active

Platforms contracted directly by the Client

Where a client holds its own contract with a transmission platform provider, that provider acts as the client's own processor and is not a sub-processor of Salviminda. Salviminda transmits documents to, and retrieves them from, that platform on the client's documented instruction under clause 6.5 of the Data Processing Agreement. These platforms are listed here so that the data flow is fully visible, not as part of Salviminda's own processing chain.

Platform	Purpose	Processing location	Provider entity and transfer position	Status
Avalara	Peppol access point and national platform services: transmission, conversion and status reporting for documents exchanged through the S-Link interface	European Union	Avalara Europe Ltd, United Kingdom. Processing takes place within the European Union. Avalara personnel do not access the content of documents exchanged through the Service, so no personal data is transferred to the United Kingdom. Were any such access to occur it would be covered by the European Commission adequacy decisions for the United Kingdom, renewed 19 December 2025 and valid until 27 December 2031	Active
B2Brouter	As above, where the client contracts B2Brouter directly rather than procuring it through Salviminda	European Union — Spain	B2Brouter Global SL, NIF B63276174, Barcelona. Within the EU	Available

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 acting as controllers in their own right, platforms that the client contracts directly — those are set out separately under Platforms contracted directly by the Client — or platforms to which transmission is required by law, see the note on Chorus Pro below. Professional advisers bound by professional confidentiality 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 Article 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. 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, 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 is therefore not listed 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.

Internal applications and the planned migration. Salviminda is redeploying both applications to its own Microsoft Azure environment in the European Union, by 31 January 2027. In the redeployed environment the data is reachable only through the applications themselves, and administrative access to the environment is restricted to system administrators located in the European Union. On completion no personal data is held on the platform provider's infrastructure and the provider ceases to act as a sub-processor. Until that migration completes, personal data submitted by client users in support tickets is processed outside the European Union, and for clients with a contractual requirement that their data not be processed outside the EU, support is handled without use of the ticket application.

Changes to this list. Clients are notified of intended changes at privacy@salviminda.com and may raise an objection to the same address.