



envoria™

Envoria - Information on Subprocessors

To ensure a stable and efficient service offering, Envoria relies on carefully selected external service providers who perform specific tasks on our behalf. These so-called subprocessors may access personal data where necessary for their activities. Access is always restricted to the minimum necessary.

The protection of our business partners' data is a top priority for us. All service providers are contractually bound to comply with applicable data protection laws and security standards. If personal data is transferred to countries outside the European Economic Area (EEA), this is done only under appropriate safeguards, such as EU adequacy decisions, standard contractual clauses, or participation in the EU-U.S. Data Privacy Framework where applicable.

Planned changes regarding subprocessors, whether additions or replacements, will be announced in advance. As outlined in our data processing agreements, business partners have the right to object to such changes.

If you have questions about our service providers or this procedure, please contact our Data Protection Officer: dataprivacy@envoria.com

List of Subprocessors

a) Exoscale (used for the Envoria SaaS solution)

- **Service:** Web hosting and Infrastructure
- **Head Office:** Akenes S.A. Boulevard de Grancy 19a 1006, Lausanne, CH
- **Data Processing Location:** EU
- **Privacy Policy:** <https://www.exoscale.com/privacy/>
- **Legal Basis for Transfer:** Akenes S.A. is based in Switzerland (an adequacy decision by the European Commission is in place). The data centers used (Exoscale) are located in Munich (GER) and Frankfurt am Main (GER) – no international data transfers.
- **Data Categories Processed:** Communication data (e.g. phone, email), IT usage data (e.g. user ID, passwords, roles)
- **Technical & Organisational Measures:** <https://www.exoscale.com/compliance/>

b) Hetzner Online GmbH (used for the Envoria Lease Accounting SaaS solution)

- **Service:** Web hosting und Infrastructure
- **Head Office:** Industriestraße 25, 91710 Gunzenhausen, DE
- **Data Processing Location:** EU
- **Privacy Policy:** <https://www.hetzner.com/de/legal/privacy-policy/>
- **Legal Basis for Transfer:** Based in the EU – no international data transfer
- **Data Categories Processed:** Communication data (e.g. phone, email), IT usage data (e.g. user ID, passwords, roles), contract master data
- **Technical & Organisational Measures:**
<https://docs.hetzner.com/general/others/technical-and-organizational-measures>

c) Microsoft Ireland Operations, Ltd. (Azure OpenAI Service, only when AI functions are activated)

- **Service:** Provision of Large Language Models (GPT-4.1, GPT-4.1-mini, GPT-4.1-nano, GPT-4o, GPT-4o-mini) as part of the Envoria AI functions
- **Head Office:** One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, D18 P521, Ireland
- **Data Processing Location:** Azure Region Germany West Central (Frankfurt/Main, GERMANY)
- **Privacy Policy:** <https://www.microsoft.com/en-us/privacy/privacystatement>
- **Legal Basis for Transfer:** Based in the EU – no international data transfer
- **Data Categories Processed:** Input data and generated output data (e.g. text input, prompts, generated responses), IT usage data
- **Technical & Organisational Measures:**
<https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA>

- **Notice:** Use is exclusively via a private Azure OpenAI instance. No processing by OpenAI LLC (USA)

d) Scaleway SAS (only when AI functions are activated)

- **Service:** Provision of a private generative AI platform (Mistral Model Family) as part of the Envoria AI functions
- **Head Office:** Registered office 8 rue de la Ville-l'Évêque, 75008 Paris, France
- **Data Processing Location:** EU (data centers in Paris, France and Warsaw, Poland)
- **Privacy Policy:** <https://www.scaleway.com/en/privacy-policy/>
- **Legal Basis for Transfer:** Based in the EU – no international data transfer
- **Data Categories Processed:** Input data and generated output data (e.g. text input, prompts, generated responses), IT usage data
- **Technical & Organisational Measures:** <https://www.scaleway.com/en/contracts/>
- **Notice:** Used via a private, isolated API infrastructure that does not use data for training purposes