AXIOMATIC

# Sub-processors

Axiomatic B.V. and Inora

Version 1.6, 11 November 2026

A sub-processor is a company we engage that processes personal data from Inora on behalf of a care organisation. We use as few as possible. Each has signed an agreement with us containing data protection obligations no weaker than those in our data processing agreement.

## Inora

All sub-processors of Inora process data in the European Union.

| Sub-processor | Service | Data | Location | Outside the EEA |
|---|---|---|---|---|
| Amazon Web Services EMEA SARL, Luxembourg | Hosting: application, database, document storage, search index and backups (Amazon Web Services) | All Inora data | Europe (Ireland) Region, eu-west-1 | No |

| Sub-processor | Service | Data | Location | Outside the EEA |
|---|---|---|---|---|
| Amazon Web Services EMEA SARL, Luxembourg | Language and embedding models (Amazon Bedrock, EU inference profile) | Questions, typed or spoken, and passages found while the answer is written, with the model sorting the topic for the team reports in the same step; on a written instruction, the contents of the test set, to remove the names; document passages when the search index is built; not used for training; Bedrock does not store the question or the passages and does not pass them to the model's maker | Amazon Web Services Regions in the EU | No |
| Microsoft Ireland Operations Limited, Dublin | Language models (Azure OpenAI, EU region); the system picks the model for each task | Questions, typed or spoken, and passages found while the answer is written, with the model sorting the topic for the team reports in the same step; on a written instruction, the contents of the test set, to remove the names; not used for training | An Azure region in the EU | No |

For the team reports the language model that writes the answer sorts the conversation by topic in the same step, in the EU, or on your own servers inside your network. No person reads along, and the model keeps nothing. The sorting stays in the environment and is deleted with the conversation.

Axiomatic runs Azure OpenAI with the modified abuse monitoring Microsoft approves for sensitive data: Microsoft stores no questions or answers, and no Microsoft employee reads them (https://learn.microsoft.com/en-us/azure/ai-foundry/openai/concepts/abuse-monitoring).

The parent companies of Amazon Web Services and Microsoft, Amazon.com, Inc. and Microsoft Corporation, are American and both are listed under the EU-U.S. Data Privacy Framework. Our privacy statement explains what that means.

When Inora runs for an organisation elsewhere, on its own servers or outside the EU, its data processing agreement names the suppliers and regions of that deployment.

# For our own work

These services support Axiomatic as a company. They never receive data from Inora, so they are not sub-processors in the sense of the data processing agreement. We list them because they process personal data of website visitors and of people who contact us.

| Processor | Service | Data | Location |
|---|---|---|---|
| Amazon Web Services EMEA SARL, Luxembourg | Hosting of the website axiomatic.digital (Amazon S3 and Amazon CloudFront) | Technical request data: IP address, page, time, browser | Files in the Europe (Ireland) Region; delivered through CloudFront's global network |
| Amazon Web Services EMEA SARL, Luxembourg | The AI scan: storage of the answers sent (Amazon DynamoDB), their processing (AWS Lambda) and the email to us (Amazon SES) | Answers, result, language, time and the email address if given | Europe (Ireland) Region |
| Google Cloud EMEA Limited, Dublin, Ireland | Email, documents and calendar (Google Workspace) | Correspondence and contact details. Notices name the kinds of data and the number of people affected, never data from Inora. | Google's data centres, including outside the EU |
| PostHog, Inc., United States | Web analytics and recordings of visits to the website | Pages viewed, clicks, a recording of the visit including what is typed into forms, where the visitor came from, IP address and browser; a copy of the AI scan sent; after a form or a personal link name, email address, role and organisation | PostHog's EU cloud, in Germany |
| Intercom R&D Unlimited Company, Ireland | The chat on the website | IP address, browser, the page viewed, the conversation; after a form name and email address | United States |
| IPinfo, Inc., United States | The organisation behind an IP address | The IP address only | United States |

PostHog, Intercom and IPinfo never receive data from Inora; they serve only the website, as our privacy statement describes. The US parent companies, Amazon.com, Inc. and Google LLC, and PostHog, Inc. and Intercom, Inc. are listed under the EU-U.S. Data Privacy Framework.

## Changes

We announce a new or replacement sub-processor for Inora by email to each customer's contact, at least 30 days before it starts processing. A customer can object within that period. We update this list, and the date at the top, at the same time.

Questions: privacy@axiomatic.digital.