

Sub-Processor List – Xaasy B.V.

Xaasy B.V. uses trusted third-party providers ('Sub-Processors') to support the delivery, operation, and protection of its infrastructure and services. Each sub-processor operates under an agreement imposing confidentiality and GDPR-equivalent security requirements.

Sub-Processor / Vendor	Location	Purpose	Data Categories	Xaasy Role	Safeguards / Notes
Eurofiber Cloud Infra	The Netherlands	Colocation and physical data center facilities	No direct access to customer data	Controller	ISO 27001 certified; physical security and environmental controls; EU-only location
TNGNET B.V.	The Netherlands	Network and Internet Service Provider	IP addresses, routing data, traffic metadata	Processor	EU-only processing; NBIP NaWaS and Liberty Global DDoS mitigation
PayPal (Europe) S.à r.l. & Cie	Luxembourg	Payment processing for Xaasy invoices	Billing & transaction data, customer contact info	Controller	PCI-DSS compliant; EEA jurisdiction
Stripe Payments Europe Ltd.	Ireland (EEA)	Payment processing for Xaasy invoices	Billing & transaction data, customer contact info	Controller	PCI-DSS compliant; EU Data Region
Microsoft Ireland Operations Ltd.	Ireland (EEA)	Collaboration & productivity (email, docs)	Staff and client communication data	Controller	EU Data Region; SCCs applied
Slack Technologies Ltd.	Ireland (EEA)	Internal communication tool	Internal communication metadata	Controller	EU Data Region; SCCs applied
Atlassian Pty Ltd.	Ireland (EEA)	Ticketing & project management	Support and project data	Controller	EU Data Region; SCCs applied
Doomen & Quist Accountants	The Netherlands	Accounting & audit services	Invoicing and financial data	Controller	Bound by professional secrecy & NDAs'
Twinfield (Wolters Kluwer N.V.)	The Netherlands	Accounting software	Billing & transaction data	Controller	ISO 27001 certified; EU Data Region
Basecone (Wolters Kluwer N.V.)	The Netherlands	Accounting software & document management	Billing & transaction data	Controller	ISO 27001 certified; EU Data Region

Xaasy may update this list periodically. Customers will be informed of material changes to

sub-processors that process Customer Data on Xaasy's behalf at least 30 days in advance. Non-material updates (e.g. changes to payment or administrative service providers) may be made without prior notification. The latest version of this list is available at www.xaasy.ai/legal.