

## Appendix B – List of Sub-Processors

Name	Company registration number	Address	Description of processing	Location of processing	Contact information	Special categories of personal data
<i>Supabase</i>	---	<i>548 Market Street San Francisco, CA 94104 USA</i>	<i>Database, authentication, and data storage</i>	<i>Stockholm, EU/EEA</i>	<i>support@supabase.com</i>	---
<i>Vercel</i>	---	<i>340 S Lemon Ave #4133 Walnut, CA 91789 USA</i>	<i>Hosting and frontend</i>	<i>EU/EEA</i>	<i>support@vercel.com</i>	---
<i>Amazon Web Services (AWS)</i>	---	<i>410 Terry Avenue North Seattle, WA 98109 USA</i>	<i>Infrastructure via Supabase / Vercel</i>	<i>Stockholm / EU/EEA</i>	<i>https://aws.amazon.com/contact-us/</i>	---
<i>Mistral AI</i>	<i>RCS Paris 952 418 325</i>	<i>15 Rue des Halles, 75001 Paris, France</i>	<i>Generation of answer suggestions based on text-based messages, available to lecturers. Message content is processed without user identification and is not used for training language models.</i>	<i>France, EU/EEA</i>	<i>contact@mistral.ai</i>	---

### 1. Sub-processor Authorisation and Change Notification

The Customer authorises the above sub-processors. EdBox AS shall inform the Customer of any intended changes to this list and allow the Customer to object where required by applicable law.

Where EdBox AS does not have direct institutional contact details for the Customer, such notification may be provided via the lecturers or administrative users registered in Whisperate, acting as representatives of the Customer.

### 2. Transfers outside the EU/EEA

Personal data processed on behalf of the Customer under this Agreement may, to a limited extent, be transferred to recipients outside the EU/EEA in connection with the use of the sub-processors Supabase, Vercel, and Amazon Web Services (AWS) for infrastructure and support purposes.

Such transfers are carried out on the basis of the EU Standard Contractual Clauses (SCCs) in accordance with Article 46 of the GDPR. Supabase, Vercel, and Amazon Web Services apply SCCs and/or are certified under the EU–U.S. Data Privacy Framework (DPF), where applicable.

Personal data is stored and primarily processed within the EU/EEA (Stockholm). Any transfers outside the EU/EEA are limited to what is strictly necessary for service operation, maintenance, and technical support. Appropriate technical and organisational safeguards, including encryption, access controls, and contractual obligations, are in place to ensure a level of protection essentially equivalent to that within the EU/EEA.

### 3. Processing of Special Categories of Personal Data

EdBox AS does not intend to process special categories of personal data through Whisperate, as defined in Article 9 of the GDPR.

Users are informed through Whisperate’s guidelines that the sharing of sensitive or private information is not permitted. These guidelines are made clearly available within the service, including in connection with the submission of messages.

If users nevertheless choose to share such information in text-based messages, this is done on their own initiative. EdBox AS does not facilitate, encourage, or systematically process special categories of personal data.