GDPR ART. 28 · ANNEX 2 OF THE DPA

Sub-processors and processing locations

The sub-processors REVIEWIT SAS relies on to process its customers' personal data in the REVIEWIT solution: the service provided, the processing location and the mechanism that governs any transfer outside the European Union.

VERSION	SCOPE	DISTRIBUTION
1.0 · November 2026	**REVIEWIT SAS · REVIEWIT SaaS solution, all regions**	**Public**

Document issued in French and English; the French version is authoritative.

CONTENTS

01 Sub-processors
02 Processing locations
03 Direct AI providers
04 Changes and notice

PURPOSE

For the data it entrusts to the REVIEWIT solution, the Customer is the controller and REVIEWIT SAS acts as processor (Article 28 GDPR). This document restates the list of sub-processors in Annex 2 of the data processing agreement (DPA) version 1.2 and the rules that govern it.

It is provided for information: in case of discrepancy, the DPA in force prevails.

SECTION 01 Sub-processors

SUB-PROCESSOR	SERVICE PROVIDED	PROCESSING LOCATION	TRANSFER MECHANISM
Amazon Web Services EMEA SARL Luxembourg · 38 avenue John F. Kennedy, L-1855	Hosting, databases, storage; notification e-mails (Amazon SES); AI models for the RITA assistant (Amazon Bedrock), only if the Customer enables AI mode	Hosting region chosen by the Customer, in the European Union (Paris by default)	No transfer: data stored and processed in the region. Occasional access from a third country for support: Data Privacy Framework (Amazon Web Services, Inc.) and standard contractual clauses 2021/914
Scaleway SAS France · Paris · SIREN 433 115 904	Notification e-mails	France	No transfer
Microsoft Ireland Operations Limited Ireland · Dublin · CRO 256796	Support mailbox (exchanges with the Customer)	France (tenant region), EU Data Boundary	Data Privacy Framework and standard contractual clauses 2021/914, module 3

REVIEWIT providers that do not process Customer data are not included in this list. Customers can also consult the full list of REVIEWIT's ICT service providers in their authenticated Trust Center area.

SECTION 02 Processing locations

- **Hosting region.** Data is hosted in the region chosen by the Customer and recorded in the specific terms, Paris, European Union, by default. It is stored and processed there (DPA, Art. 2 and 11).
- **RITA assistant.** The “generative AI” mode is active only if the Customer enables it. Data is then sent only to the hosting provider's model service, in the subscription's region, with an inference profile limited to its geography (the “eu.” profile in Europe); any other route is refused. Neither REVIEWIT nor its providers use Customer data to train models, and REVIEWIT does not retain conversations (DPA, Art. 12).
- **Support.** E-mail exchanges with the Customer go through the support mailbox, hosted in France within the EU Data Boundary.
- **Transfers.** No transfer outside the European Union takes place other than those listed above, each with its mechanism; REVIEWIT informs the Customer without delay if a mechanism ceases to apply (DPA, Art. 11). The document “Data location and transfers outside the EU” gives the details.

SECTION 03 Direct AI providers

Direct AI providers (Anthropic, OpenAI, Mistral AI) become sub-processors only if the Customer expressly chooses such a route in the AI processing addendum (Annex 4 of the DPA), after REVIEWIT has signed a processing agreement, a no-training commitment and, outside the European Union, a transfer impact assessment. At the date of publication, none of these direct routes is open.

SECTION 04

Changes and notice

- The Customer gives a general authorisation to use the sub-processors listed in Annex 2 of the DPA.
- REVIEWIT informs the Customer of any addition or replacement at least thirty days in advance; where the change is decided by a sub-processor with shorter notice, REVIEWIT informs the Customer as soon as it becomes aware of it.
- The Customer may object on legitimate data protection grounds and, failing agreement, terminate the service concerned without penalty.
- REVIEWIT imposes on each sub-processor data protection obligations at least equivalent to those of the DPA, taking into account the nature of the service, and remains liable to the Customer for their performance.
- Each sub-processor relies on its own sub-processors, which it publishes and keeps up to date; REVIEWIT provides the list on request. This list is updated at each change.

REVIEWIT SAS · Data protection officer: dpo@we-reviewit.com · Security: security@we-reviewit.com. List updated at each change of sub-processor.