

Aeriandi and Payments Services Subprocessors (EMEA)

Last Modified: April 2026

EMEA (includes Europe, UK and the Middle East) Customers

This list identifies the subprocessors **Aeriandi Ltd** relies on and engages to: (i) deliver its services, in accordance with the data protection controller to processor terms agreed with each individual customer (i.e. a data processing schedule part of a service agreement or a standalone data processing agreement- the “**Data Processing Terms**”); and (ii) provide processing activities on customer’s personal data on behalf of the relevant customer.

The subprocessors that specifically apply to each individual customer will depend on the services, and service configuration, Aeriandi agrees with the customer and the geographical regions where the services are provided (please see below information regarding the subprocessors’ locations and descriptions of processing).

The categories of subprocessors **Aeriandi Ltd** engages in EMEA are:

1. Infrastructure Cloud Service Processors
2. Support Subprocessors
3. Group Company Subprocessors

SUBPROCESSOR	LOCATION OF PROCESSING OPERATIONS	AERIANDI SERVICE	DESCRIPTION OF PROCESSING OPERATIONS	APPROPRIATE SAFEGUARDS FOR TRANSFERS
Infrastructure Cloud Service Processors				
Amazon Web Services (AWS)	UK	<ul style="list-style-type: none"> • PCI comply / Agent pay • PCI comply / IVR assist • PCI comply for Amazon • Connect • Pay by link • Archive • Call Recording 	<p>Aeriandi utilises Amazon Web Services to provide processing, storage and network services.</p> <p>If the customer has or wants to have Agent Pay By Link, then the first gateway for that is Amazon AWS.</p>	<p>Processing Operations always within the UK/EEA</p> <p>Data Encryption</p> <p>Data Minimisation</p>

<p>Microsoft Corporation</p>	<p>UK</p>	<ul style="list-style-type: none"> • PCI comply / Agent pay • PCI comply / IVR assist • PCI comply for Amazon • Connect • Pay by link • Archive • Call Recording 	<p>Aeriandi utilises Microsoft Azure Cloud Services to provide processing, storage and network services.</p> <p>Payment logging (contains no payment information) is stored in Azure.</p> <p>Call meta data and SMS (encrypted) are stored in Azure for Call Archive/Recordings.</p>	<p>Processing Operations always within the UK/EEA Data Encryption Data Minimisation</p>
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Support Subprocessors				
Wipro Limited	India, Australia	<ul style="list-style-type: none"> • PCI comply / Agent pay • PCI comply / IVR assist • PCI comply for Amazon • Connect • Pay by link • Archive • Call Recording 	<p>Wipro is a sub-processor of Dubber Pty Ltd.</p> <p>Dubber utilises Wipro for first line technical platform support.</p> <p>Wipro provides Dubber with a 24x7 platform and application support capability. Responding to alerts and incidents using curated standard operating procedures (SOP's), and escalating to development teams where necessary.</p> <p>Wipro may access customer data in very limited circumstances and on a need to know basis (for the only purpose of providing IT services to the relevant Customer).</p>	<p>EU Standard Contractual Clauses & the UK IDTA Addendum</p> <p>Data Encryption</p> <p>Data Minimisation</p>

Group Company Subprocessors

Depending on the geographic location of **Aeriandi Ltd** customers or their individual end users and the nature of the services **Aeriandi Ltd** provides to them, **Aeriandi Ltd** may also engage one or more of its Affiliates as Subprocessors.

The following **Aeriandi Ltd** affiliates may process customer data (including personal data contained therein) in the course of providing support, operating, delivering, and maintaining **Aeriandi Ltd** services, including: (i) contracting cloud storage solutions for **Aeriandi Ltd**, its Affiliates, and its customers with Infrastructure Cloud Service Processors; (ii) call recording software services; (iii) Call Recording software-as-a-service development, testing and IT support; and (iv) the provision of other operational, business development, sales and support services to **Aeriandi Ltd** and its Affiliates.

Dubber Pty Ltd	Australia Registered Address: Level 5, 2 Russell Street, Melbourne, 3000, Australia	<ul style="list-style-type: none"> ● PCI comply / Agent pay ● PCI comply / IVR assist ● PCI comply for Amazon ● Connect ● Pay by link ● Archive ● Call Recording 	Group company <i>(Administrative, billing, back office and IT support and maintenance services).</i> Dubber Pty Ltd, may access customer data in very limited circumstances and on a need to know basis (for the only purpose of providing customer or IT support services to the relevant Customer).	EU Standard Contractual Clauses & UK IDTA Addendum Data Encryption Data Minimisation
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<p>Dubber Inc</p>	<p>USA</p> <p>Registered Address: 300 Congress Street, STE 406, Quincy, MA 02169, United States of America</p>	<ul style="list-style-type: none"> • PCI comply / Agent pay • PCI comply / IVR assist • PCI comply for Amazon • Connect • Pay by link • Archive • Call Recording 	<p>Group company (<i>follow-the-sun customer support service</i>)</p>	<p>EU Standard Contractual Clauses & UK IDTA Addendum</p> <p>Data Encryption</p> <p>Data Minimisation</p>
<p>Dubber Ltd</p>	<p>UK</p> <p>Registered Address: 264 Banbury Road, Oxford, Oxfordshire, England, OX2 7DY United Kingdom</p>	<ul style="list-style-type: none"> • PCI comply / Agent pay • PCI comply / IVR assist • PCI comply for Amazon • Connect • Pay by link • Archive • Call Recording 	<p>Group company (<i>customer support services</i>)</p>	<p>EU Commission Adequacy Decisions or UK “adequacy regulations”</p> <p>Data Encryption</p> <p>Data Minimisation</p>