LEGAL

Sub-processor List

Version
v2026–12–01
Effective
1 December 2026
SHA-256
b2e9f1cac6717cf7e5bce34e5dd8a62517a8c81894d5c71e4244459cad365789

The English version prevails.

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1. Introduction

1.1 PUSH - CONSULTING LLC, 30 N Gould St Ste N, Sheridan, WY 82801, USA, Wyoming Secretary of State Filing ID 2026-002106936 ("Provider"), engages the sub-processors listed below to provide the Growmino One Services and, where stated, Professional Services. This list is Appendix 3 (Annex III to the Standard Contractual Clauses) of the Data Processing Addendum ("DPA", Schedule 3 to the Customer Terms of Service). It is valid as of the effective date stated above. Provider maintains it at growmino.de/legal/subprocessors.

1.2 **General authorisation.** By accepting the Customer Terms of Service and the DPA, Customer grants general authorisation to engage the sub-processors on this list (Section 6.1 DPA).

1.3 **Notice of changes.** Provider gives at least 30 days' notice of any intended addition or replacement of a sub-processor by e-mail and on this page (Section 6.2 DPA). Customer may object on reasonable data-protection grounds within 30 days of notice (Section 6.3 DPA). Emergency replacements needed to maintain security or availability are notified without undue delay (Section 6.4 DPA).

1.4 **Subscribing to notices.** Administrators of a Customer account receive change notices automatically by e-mail. Any other person may subscribe by sending a request to office@growmino.de.

1.5 **Transfer mechanisms.** Provider is established in the USA and relies on the EU Standard Contractual Clauses and, where available, sub-processors' certification under the EU-U.S.

Data Privacy Framework (including the UK Extension and the Swiss-U.S. Data Privacy Framework) ("DPF"). Provider does not claim a DPF certification of its own. Where a sub-processor's DPF certification does not exist or does not cover the processing, standard contractual clauses (Module 3, processor to processor) apply. The current certification status of US companies can be checked at dataprivacyframework.gov.

1.6 Provider does not use Customer Personal Data to train AI models and does not permit its sub-processors to do so.

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2. Sub-processors

#	Entity and country	Service / purpose	Modules	Data categories	Processing location / region	Transfer mechanism	Since
1	Supabase Inc., USA (infrastructure: Amazon Web Services)	Database, authentication, file storage, backups	CRM, Booking, HR	All Customer Data stored in the respective Module (see Appendix 1 DPA), including user account data within the application	CRM: AWS eu-central-1 (Frankfurt, Germany). Booking: AWS eu-west-1 (Ireland). HR: AWS eu-central-1 (Frankfurt, Germany). Support and administrative access from the USA possible	Data stored in the EU; for access from the USA: DPF where the sub-processor's certification covers the processing, and SCC Module 3	01.12.2026

#	Entity and country	Service / purpose	Modules	Data categories	Processing location / region	Transfer mechanism	Since
2	Lovable Labs Incorporated / Lovable (Sweden)	Application hosting via Cloudflare Workers, build and deployment, transactional e-mail via notify.growmino.de, AI Gateway (routing of AI requests)	All Modules	Data processed by the application in transit; e-mail addresses and content of transactional e-mails (for example notifications, signing links and one-time passwords); content of AI requests	EU, USA, global edge	Sweden: within the EU/EEA, no transfer. USA: DPF where available, otherwise SCC Module 3	01.12.2026
3	Cloudflare, Inc., USA	Content delivery network (CDN), edge execution, transport security	All Modules	Data in transit, IP addresses, technical connection data	Global (edge location closest to the user)	DPF where available, otherwise SCC Module 3	01.12.2026
4	Google LLC, USA / Google Ireland Limited, Ireland (engaged via the Lovable AI Gateway)	AI models (Gemini) for transcription and text generation	CRM (transcription and summaries of calls), Booking (AI offers and texts)	Call audio and transcripts, prompt content and generated text, which may contain contact and business data	USA, EU	Ireland: within the EU/EEA. USA: DPF where available, otherwise SCC Module 3	01.12.2026

#	Entity and country	Service / purpose	Modules	Data categories	Processing location / region	Transfer mechanism	Since
5	Twilio Inc., USA	Telephony and SMS, call recordings and voicemail	CRM (only where Customer uses Provider's telephony)	Telephone numbers, call and message metadata, SMS content, call recordings and voicemails	USA	DPF where available, otherwise SCC Module 3	01.12.2026
6	Hostinger International Ltd., Cyprus (servers in Lithuania)	VPS hosting of websites	Professional Services only (websites operated by Provider for Customer under a SOW); no Customer Data from the Growmino One applications	Website content, contact-form data and server log data of websites operated for Customer	Lithuania, EU	Within the EU/EEA, no transfer	01.12.2026
7	Google Ireland Limited, Ireland / Google LLC, USA (Google Workspace)	Provider's business e-mail (office@growmino.de), calendar and file storage, used for support, project communication and the exchange of files with Customer	All Modules and Professional Services	Contact data and content of support and project communication, files and Customer Materials sent to Provider, appointment data	EU, USA	Ireland: within the EU/EEA. USA: DPF where available, otherwise SCC Module 3	01.12.2026

3. Independent controllers (not sub-processors)

3.1 **Stripe.** Payments for Subscriptions are processed by Stripe Payments Europe, Limited (Ireland) and Stripe, Inc. (USA). Stripe processes payment and billing data as an independent controller under its own terms and privacy policy. Stripe is not a sub-processor of Provider and is therefore not subject to the notice and objection procedure in Section 6 DPA.

4. Customer-connected services (not sub-processors)

4.1 Customer and its Authorised Users may connect their own accounts with third-party services to the Services, in particular:

- Google Workspace or Google accounts of Customer (e-mail sending, calendar synchronisation);
- Microsoft 365 or Outlook accounts of Customer (e-mail sending, calendar synchronisation);
- Customer's own Twilio account, where Customer uses it instead of Provider's telephony;
- Customer's own integration tools (for example Zapier) and advertising accounts.

4.2 These services are services of Customer under Customer's own contract with the respective provider. Their providers are not sub-processors of Provider. Customer is responsible for these contracts and for the data flows it initiates (Section 2.5 DPA).

5. Change history

Version	Date	Change
v2026-12-01	1 December 2026	Initial list on the transfer of the Growmino One Services to PUSH - CONSULTING LLC. The HR Module is hosted in AWS eu-central-1 (Frankfurt) from this date.