Subprocessors

Version 1.2 | Last updated 29 September 2026

This is a translation of the French original, which governs in case of divergence.

This page lists the subprocessors Avanserv SRL relies on to provide its services, as article 5 of the data processing agreement requires. Every one of them is bound by a contract meeting article 28 of the GDPR.

Subprocessor	Registered office	Service	Where processing happens	Transfer safeguards
Scaleway SAS	8 rue de la Ville l'Évêque, 75008 Paris, France	Hosting infrastructure and object storage	European Union	Not applicable, processing stays in the EU
Google Ireland Limited	Gordon House, Barrow Street, Dublin 4, Ireland	Business mail and office tools (Google Workspace)	European Union, and any country where Google Ireland Limited or one of its own subprocessors processes data, per the list Google publishes	The European Commission's standard contractual clauses for those transfers, completed for the United States by the EU-US Data Privacy Framework certification (adequacy decision of 10 July 2023, under appeal before the Court of Justice, case C-703/25 P)

Scaleway SAS will also send transactional email, in France, once that relay is running. This table will then be updated under the notice procedure below.

A service this table does not list

When a user picks or changes a password, the first five characters of a cryptographic hash of the candidate password go to the Have I Been Pwned service, to check that it does not appear in a known breach. That fragment cannot reconstruct the password or identify a

person, and nothing else travels with the request, so the service receives no personal data and is not a subprocessor. It is named here because a client auditing this list should be able to see the outbound call rather than discover it.

Notice of changes

Adding or replacing a subprocessor is announced by email to the clients concerned at least 30 calendar days before it takes effect, and this page is updated on the same schedule. Clients hold the right to object described in article 5 of the data processing agreement. Questions: privacy@avanserv.com.

History

Version	Date	Change
1.2	2026-09-29	Announced that Scaleway SAS will also send transactional email, in France, once that relay is running; corrected the geographic scope and the transfer safeguards for Google Workspace.