

Annex III – Sub-Processors

This Annex forms part of the Data Processing Agreement (DPA) between Rizer Inc. (“Processor”) and the Customer (“Controller/Business”).

Rizer engages carefully selected **sub-processors** to support delivery of the Service. Each sub-processor is contractually bound to process Customer Data only for the purposes of providing services to Rizer, under written agreements that include data protection obligations consistent with GDPR Article 28, CCPA/CPRA, and applicable safeguards.

1. Current Sub-Processor List

Sub-Processor	Purpose of Processing	Location(s) of Processing	Safeguards / Transfer Mechanism
OpenAI, L.L.C.	AI-based text analysis and recommendations (LLM inference)	United States	EU Standard Contractual Clauses (SCCs); EU-US Data Privacy Framework
Google LLC (Google Gemini, Google Cloud Platform)	AI inference (Gemini models), natural language processing, hosting/infrastructure	United States / Global (Google Cloud regions)	SCCs; EU-US Data Privacy Framework
Anthropic PBC (“Claude”)	AI-based reasoning, summarization, and recommendation generation	United States	SCCs; EU-US Data Privacy Framework
Google Analytics (via Google Tag Manager)	Website analytics and measurement (controller context only)	United States / Global	SCCs; EU-US Data Privacy Framework
Hosting & Infrastructure Providers (e.g., cloud hosting, CDN)	Secure hosting, networking, and content delivery	United States / EU regions (depending on configuration)	SCCs; EU-US Data Privacy Framework; ISO

2. Sub-Processor Onboarding & Monitoring

- **Due diligence:** security and privacy assessments are performed before engaging a new sub-processor.
 - **Written agreements:** all sub-processors are bound by contracts with data protection obligations.
 - **Ongoing monitoring:** certifications and security reports are periodically reviewed.
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3. Change Notification & Objection Process

- Customers will be notified **at least 30 days in advance** of any material change to this sub-processor list (e.g., adding or replacing a sub-processor).
 - Notice will be provided via email to Customer's registered contact or via in-product communication.
 - Customers may object on reasonable, documented privacy/security grounds. If the objection cannot be resolved, Customer may terminate the affected functionality or agreement segment in accordance with the DPA.
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4. Historical Record

The most up-to-date sub-processor list is always published at <https://rizer.io/data-processing-agreement-dpa/>

Archived versions are retained for audit purposes.