

Sub-Processor Register, FME Processors (Art. 28 GDPR)

This list documents all sub-processors engaged in the processing of personal data pursuant to Art. 28 GDPR. Last updated: July 2026

Processor Name	Processing Location	Category	Purpose of Processing	Scope of Processing
Microsoft Corporation - Azures Cloud Services Microsoft Corporation Dept. 551 6880 Sierra Center Parkway Reno, Nevada 89511-1137 USA Microsoft Ireland Operations Limited (Microsoft's data protection representative for the EEA) One Microsoft Place South County Business Park Leopardstown Dublin 18, D18 P521, Ireland Microsoft Dynamics 365 Microsoft Ireland Operations Limited (Microsoft's data protection representative for the EEA) One Microsoft Place South County Business Park Leopardstown Dublin 18, D18 P521, Ireland	Primary location: North Europe (Ireland) Secondary location: West Europe (Netherlands)	Cloud Infrastructure	Hosting and operation of the backend platform (IaaS/PaaS), storage, networking, security services, monitoring as required to deliver the solution. Core backend processing for supply and order management: case/order handling, stock and replenishment workflows, traceability support. Order management data and related operational records; links to treatment events via pseudonymous identifiers where feasible; access limited to authorised logistics/pharmacy and operational roles.	Backend hosting in EU data centres, storage of data, encrypted transport, platform logs, infrastructure operations; no independent use of data. Order management data and related operational records; links to treatment events via pseudonymous identifiers where feasible; access limited to authorised logistics/pharmacy and operational roles.
Virtusa Corporation 132 Turnpike Road, Suite 300, Southborough Massachusetts, USA	Germany and Poland	IT Services	IT services: development, maintenance, and operational support (as contracted).	Access to systems and data strictly limited to assigned tasks; support access time-bound, role-restricted and logged; clinical content access only where unavoidable for troubleshooting and under documented instruction.
HelpLine GmbH Serviceware-Kreis 1 65510 Idstein (formerly based at Carl-Zeiss-Straße 16, 65520 Bad Camberg), Germany	Germany – hosting and remote access of SaaS Solution (ITSM Ticket system)	Service Desk / Support	Service desk / customer support operations.	User/staff contact details and support case data; strict minimisation to avoid patient health data in tickets; access controls and retention limits applied.
ZITEC COM SRL 165 Splaiul Unirii. TNO2 Building, 6th floor. 3rd district, 030133 Bucharest, Romania.	Romania	Engineering / Managed Services	Engineering / managed services support (maintenance and troubleshooting).	Time-bound administrative access; data access restricted to least privilege; logging and approval workflow for elevated access.
Integron Technologies BV (A KORE Wireless company) Bamfordweg 1, 6235 NS Uilestraten, Netherlands	Ireland	Integration / Technical Services	Integration and technical services (interfaces, connectivity, implementation as contracted).	Technical identifiers and operational data required for integrations; access to patient data only where necessary and under instruction; change management and logging apply.
Emnify GmbH Charlottenstraße 4, 10969 Berlin, Germany	AWS - Ireland	IoT / SIM Management	IoT connectivity / SIM management for device gateways where mobile connectivity is used.	SIM/IMEI/ICCID and connectivity metadata (network identifiers, IP addressing, session timestamps); no clinical content expected; access restricted.

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Huma Therapeutics Limited 13th Floor Millbank Tower, 21-24 Millbank, London, SW1P 4QP, United Kingdom	EU: France UK: France US: United States	Frontend / Cloud	Frontend processing in support of all solution purposes: therapy provisioning and documentation, treatment monitoring, device status, patient-facing functionality, supply/order management, quality/compliance support, and access management.	Patient/admin data, clinical/treatment data, device telemetry/alarms, order/traceability data; role-based access control; session management; support activities strictly under instruction. Hosted on GCP.
EPAM Systems GmbH Friedrich-Ebert-Anlage 49 60308 Frankfurt am Main Germany	Hosted by FME in EU Azure Cloud. Remotely accessible from the following EPAM possible locations: UK, France, The Netherlands, Spain, Portugal, Poland, Bulgaria, Czech Republic, Slovakia, Romania, Switzerland, Bucharest and Lithuania.	Service Provider	Ressources for L3 Support Backend Infrastructure	User/staff contact details and support case data; strict minimisation to avoid patient health data in tickets; access controls and retention limits applied.