

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	Role / Engagement Type	Processing Location	Category	Purpose of Processing	Scope of Processing
Microsoft Corporation - Azure 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	FME Sub-Processor	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.	Backend hosting in EU data centres, storage of data, encrypted transport, platform logs, infrastructure operations; no independent use of data.
Virtusa Corporation 132 Turnpike Road, Suite 300, Southborough Massachusetts, USA	FME Sub-Processor	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	FME Sub-Processor	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	FME Sub-Processor	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 Ulestraten, Netherlands	FME Sub-Processor	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	FME Sub-Processor	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.
Huma Therapeutics Limited 13th Floor Millbank Tower, 21-24 Millbank, London, SW1P 4QP, United Kingdom	FME-Sub Processor	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.