Annex - Sub-Processor Register

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This register is reviewed and updated periodically.

Nuclei engages a limited number of trusted third-party sub-processors to support hosting, communication, analytics, and operational delivery of our services.

The table below lists the current categories of sub-processors, the Nuclei entity responsible, processing purpose, location of data centres, and international-transfer safeguards.

Each sub-processor is bound by written Data Processing Agreements and, where applicable, Standard Contractual Clauses (SCCs) or equivalent safeguards.

For European Region Clients :

Nuclei has two entities in picture

1. Contracting Entity : CDNA Technologies Pvt Ltd (India)
2. Operational Entity : Nuclei Technologies Unipessoal Lda (Portugal)

Category / Function	Sub-Processor (Name)	Purpose of Processing	Data Location	Transfer Safeguard
Cloud Hosting / Infrastructure	**Amazon Web Services (AWS EU)**	Hosting and operation of SDK and platform services	EU	SCCs, EU Adequacy Decision
Payment Processing	**PayPal EU (Braintree)**	Transaction authorisation and settlement	EU	EU Adequacy Decision
Giftcard Purchase	**Hurray (EU)**	To fulfil gift card orders	EU	EU Adequacy Decision
Giftcard Purchase	**Cashwave**	To fulfil gift card orders	EU	EU Adequacy Decision
Email and SMS Delivery	**Twilio Inc.**	Transactional and system emails and SMS	US/EU	EU-U.S. Data Privacy Framework
SMS Delivery	**Gupshup**	Transactional Messages Delivery	EU / India	SCC
AI Support Services	**Microsoft Azure OpenAI and Speech Services**	Chat and voice AI support processing	EU / US	SCCs, Data Privacy Framework
Analytics	**CleverTap (IN)**	To provide analytics	EU / IN	SCC
Customer Support	**FreshDesk**	Handling Customer Raised Tickets	India	SCC

Notes:

- All infrastructures listed above are administered and monitored by authorised Nuclei personnel located in India under intra-group Data Processing Agreements and Standard Contractual Clauses (SCCs).

This remote administrative access does not change the physical hosting location indicated for each sub-processor

- When new sub-processors are engaged or replaced, updates will be published here, and affected controllers will be notified in advance as required by their DPA.