

ANNEX IV:

Sub-processors, sub-providers and data locations

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Scope

Tables in this document lists House of Control and its Subsidiaries third party sub-processors, that may process customer personal data under the Data Processing Agreement (DPA) applicable to House of Control's services (the "Services"). The sub-processors only process personal data for the purpose of delivering the Services House of Control has engaged them to provide. They are not permitted to use any personal data for any other purpose and never for they own purposes. These sub-processors may provide services to one or more Services under the DPA. Each Subsidiary may act as a sub-processor for any House of Control company in relation to any part of the Services.

Review

Last reviewed 2026-09-17

Versions

Version	Major changes since last version
2026:2 (V5.1)	• Adding sub-processors for new product "James" • Adding sub-processor for new product "AI Companion" • Specified vendor services related to product portfolio (No changes to vendors in existing portfolio)
2026:1 (V.5)	• SURVICATE replaces WOOTRIC as vendor for pNPS • Sub-provider WOOTRIC has been removed. • Sub-provider SURVICATE S.A. has been added.
2025:1 (V.4)	• The section "Versions" has been added. • The section "Scope" has been added. • Description in Specifications is updated. • DPA reference column added in lists. • HubSpot changed from sub-provider to sub-processor • Sub-processor UNLESS has been added.
2024:1 (V.3)	• Adding Dustin Norway AS as Sub-provider. • Adding Orca Security UKJ Ltd as Sub-processor. • Extensive updates to include more detailed information on sub-processors used, scope, and customer separation. • Organisation numbers column added

Included companies and services

This document is applicable for the following House of Control companies (henceforth named House of Control):

- **House of Control AS,**
a Norwegian registered company with organisation number 990 637 423
- **House of Control A/S,**
a Danish registered company with organisation number 36506822
- **House of Control Sverige AB,**
a Swedish registered company with organisation number 556628-3320
- **Business Analyze AS,**
a previous Norwegian company who was registered with organisation number 984 589 379.
Business Analyze AS is after August 2024 a part of House of Control AS

Specifications

House of Control differentiates sub-processors, sub-providers and data locations:

- **A sub-processor**
is a third-party data processor engaged by House of Control, including its Subsidiaries, who have or potentially will have access to or process customer data (which may contain personal data). House of Control engages different types of sub-processors to perform various functions.
- **A sub-provider**
is a third-party sub-provider House of Control use internally to deliver their services. Sub-providers do not process or store any customer data, but they are important vendors to ensure availability of House of Controls services.
- **A data storage location**
is typically the data centre used for the storage of customers data as part of the service delivery. The storage may include storage of personal data if personal data is stored in the application.

Sub-processors for House of Control services:

Sub-processor	Data owners	DPA Reference	Purpose of Processing	Data processing & data storage location
Amazon Web services Inc., EU972013112 410 Terry Avenue North, Seattle, WA 98109-5210, USA	All Complete Control customers and Business Analyze customers with Public cloud (AWS) Except UK Customers	Standard Contractual Clauses	Managed infrastructure hosting services Managed database- and file system services Managed backup services Managed container services 3rd line incident response	Data is hosted at: Stockholm, Sweden AWS region eu-north-1 (Stockholm, Sweden)
Amazon Web services Inc., EU972013112 410 Terry Avenue North, Seattle, WA 98109-5210, USA	Complete Control customers with AI Companion module	Standard Contractual Clauses	Managed AI infrastructure through AWS	AI services are processed at AWS datacentres in EU Regions
Amazon Web services Inc., EU972013112 410 Terry Avenue North, Seattle, WA 98109-5210, USA	All UK-based Complete Control customers with Public cloud (AWS)	Standard Contractual Clauses	Managed infrastructure hosting services Managed database- and file system services Managed backup services Managed container services 3rd line incident response	Data is hosted at: London, United Kingdom AWS region eu-west-2 (London, UK)
Microsoft Ireland Operations Ltd, 256796 One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland	All James customers	Standard Contractual Clauses (opt-out possible)	Managed infrastructure hosting services Managed database- and file system services Managed backup services Managed container services 3rd line incident response	Data is hosted at: Microsoft Azure Sweden Central-Azure-region (Gävle, Sweden)
GROUP.ONE NORWAY AS 984 106 211 Jernbanegaten 3, N-3111 Tønsberg, Norway	For Norwegian based Complete Control customers in Private cloud (not AWS)	Standard Contractual Clauses	Managed server hosting Managed Backup Server monitoring and incident response	Data is hosted at: DigiPlex Norway AS Selma Ellefsens vei 1, N-0581 Oslo, Norway
Powerhosting ApS, 33055048 Dalgasgade 11, DK-7400 Herning, Denmark	For Danish based Complete Control customers in Private cloud (not AWS)	Standard Contractual Clauses	Managed server hosting Managed Backup Server monitoring and incident response	Data is hosted at: GlobalConnect A/S Hørskættø 3, DK 2630 Taastrup, Denmark
Braathe AS, 981933311 Nærumveien 24, N-1580 Rygge, Norway	For Business Analyze customers only (not customers utilizing both CC5 and BA)	Standard Contractual Clauses	Hosting and operation of servers for BA.	Data is hosted at: DigiPlex Norway AS Selma Ellefsens vei 1, N-0581 Oslo, Norway

Orca Security Ltd., 515961761 3 Tushia St., Tel Aviv, 6721803, Israel	All Complete Control customers in Public Cloud (AWS) All James customers in Public Cloud (Azure)	Standard Contractual Clauses	Vulnerability Management Threat detection Data protection	Data is hosted at: AWS region eu-central-1 (Frankfurt, Germany)
Microsoft Ireland Operations Ltd, 256796 One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland	All Complete Control customers	Standard Contractual Clauses (opt-out possible)	Incoming email (Inbox functionality in Complete Control)	Data is hosted at: Microsoft Azure North-europe-Azure-region (Dublin, Ireland)
Microsoft Ireland Operations Ltd, 256796 One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland	All James customers	Standard Contractual Clauses	Outgoing email service	Data is hosted at: Microsoft Azure Sweden Central-Azure-region (Gävle, Sweden)
MailJet, 524 536 992 43 rue de Dunkerque, 75010 Paris, France	All Complete Control and Business Analyze customers	Standard Contractual Clauses	Outgoing emails from the service	Data is hosted at: Google Cloud Platform in Frankfurt, Germany and Saint-Ghislain, Belgium.
SnowPlow, 07852221 48-50 Scrutton Street London EC2A 4HH United Kingdom	All Complete Control customers	Standard Contractual Clauses (opt-out possible)	Data collection capabilities to capture more detailed information about customer behaviour within the service. No production data processing.	Data is hosted at: AWS EU
Product Fruits, 09552618 Rozdelovska 1999/7, 169 00 Praha 6, Czech Republic	All Complete Control customers	Standard Contractual Clauses	In-app messaging within the service No production data processing.	Data is hosted at: AWS EU
Survicate (Survicate S.A.) 0001021023 Zamiany 8 LU2 Street 02 – 786, Warsaw Polen	All customers	Standard Contractual Clauses (opt-out possible)	Net promoter Score (pNPS) for the service. No production data processing.	Data is hosted at: AWS EU

HubSpot IE9849471F HubSpot Ireland Ltd, 1 Sir John Rogerson's Quay Dublin 2 Ireland	All customers	Internal data processing.	HoC CRM solution. No production data processing. Customers might be mentioned, named customer reference person might be listed (including e-mail address and case context)	All data is stored within EU. No data is transferred outside the EEA.
Link Mobility AS, 992 434 643 Langkaia 1, N-0101 Oslo, Norway	All Complete Control customers	Standard Contractual Clauses (opt-out possible)	Link Messaging Gateway	Data is hosted at: Microsoft Azure, EU, Ireland
Visma Software	All James customers	Standard Contractual Clauses (opt-out possible)	Authentication provider; Visma Connect	Data is hosted at: Microsoft Azure, EU, Ireland
Signicat AS, 989 584 022 Grensen 12B, N-0159 Oslo, Norway	Optional for all Complete Control customers	Standard Contractual Clauses	Identity verification Electronic signatures Identity methods	Data is hosted at: Google Ireland Limited, Google Cloud Platform
Svensk e-identitet AB 555 776-6992 Vaksalagatan 6, 753 20 Uppsala, Sweden	Optional for all Complete Control customers	Standard Contractual Clauses	Identity verification Electronic signatures Identity methods	Data is hosted at: AWS EU/EEA
Penneo A/S, CVR 35633766 Gærtorvet 1-5DK-1799 København V, Denmark	All James customers	Standard Contractual Clauses	Identity verification Electronic signatures Identity methods	Data is hosted at: AWS EU/EEA
Google Cloud EMEA Ltd.IE660412 70 Sir John Rogersson's Quay, Dublin 2 D02 NX53, Ireland	All customers	Visma Internal data processing agreement.	HoC Google Mail service. No production data processing.	Data is hosted at: Google EU/EMEA

Sub-providers for House of Control internal:

Name	Data owners	Legal basis	Purpose of Processing	Data processing & data storage location
Visma Software International AS, 980 858 073 Karenslyst Alle 56, 0277 Oslo, Norway	HoC / Visma	Visma Internal data processing agreement.	Patching of laptops and computers Office support tools (Google, Microsoft) SOC Service End-to-end Support Security and compliance	All data is stored within EU. No data is transferred outside the EEA.
Dustin Norway AS 939 483 969 Tykkmyrveien 1, N-1597 Moss, Norway	HoC	Internal data processing.	Network Services House of Control's office locations 24/7 monitoring and error handling Network Support Network Authentication and 2FA	No data storage, processing in Norway
Unless 65190645 Panamalaan 8-D, 1019 AZ Amsterdam, The Netherlands	HoC	Standard Contractual Clauses	Customer support AI chatbot	Personal data is stored within EU. Non-personal/functional data is distributed globally (via AWS DynamoDB across EU and US.