UK GDPR ARTICLE 28 LIST

# Sub-processors

Issued by Datazero Ltd trading as NumberGroup. Forms part of the NumberGroup Agreement.

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| EFFECTIVE<br>**1 November 2026** | VERSION<br>**1.0** |
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| CONTACT<br>**help@numbergroup.com · 0800 310 1010** | ONLINE COPY<br>**numbergroup.com/terms** |

## 1. Our own infrastructure

Call recording, transcription, AI analysis and the call databases run on servers and transcription computers that Datazero Ltd owns and operates in a datacentre in the Isle of Man. Call content is analysed only by AI models running on that infrastructure. The Isle of Man is covered by UK adequacy regulations and by an EU adequacy decision (Commission Decision 2004/411/EC), so no further transfer safeguard is needed for data held there. An encrypted backup copy is also held off-site with Hetzner Online GmbH in Germany (EU), for disaster recovery (see below).

## 2. Sub-processors

| Supplier | Purpose and data | Location | Transfer safeguard |
|---|---|---|---|
| Cloudflare, Inc. | Audio storage: storage of call audio, encrypted by us before it is stored, with keys only we hold. Sign-in: email sign-in to the Call IQ portal and MCP service (sees your sign-in email, not call content). Network edge and security. | Audio storage: Western Europe (EEA). Sign-in and network edge: global. US company. | UK adequacy (EEA) for audio storage; UK IDTA / SCCs with UK Addendum and UK Extension to EU-US Data Privacy Framework for Cloudflare, Inc. |
| Postmark (ActiveCampaign, LLC) | Sending transcribed and Call IQ emails (summaries, alerts and recording links) to customers. | US | UK Extension to EU-US Data Privacy Framework / SCCs with UK Addendum |
| Resend, Inc. | Sending website and account emails (orders, membership, basket). | US | SCCs with UK Addendum / UK IDTA |
| Functional Software, Inc. (Sentry) | Error and performance monitoring of our systems. | EU (Germany) | UK adequacy (EEA) |
| Hetzner Online GmbH | Encrypted off-site backup copy (for disaster recovery). | EU (Germany) | UK adequacy (EEA) |
| Slack Technologies, LLC | Internal operational and fraud alerts to our team. Alerts carry call metadata and alert summaries only (for example calling number, caller name and a short summary); no audio or transcripts. | US | UK Extension to EU-US Data Privacy Framework / SCCs with UK Addendum |
| Freshworks Inc. (Freshdesk) | Support tickets and enquiries (support-ticket data only). | EU / US | SCCs with UK Addendum |
| Vercel Inc. | Hosting of numbergroup.com. | UK / EU / US | SCCs with UK Addendum |
| Neon, Inc. | Database for the website, accounts and billing. Not used for call recordings, transcripts or call data. | EU / US | SCCs with UK Addendum |
| Stripe Payments UK Ltd | Card payments and checkout. | UK / EEA / US | UK adequacy; SCCs with UK Addendum |
| Tailscale Inc. | Private network connecting our servers and authorised staff devices. Traffic is end-to-end encrypted; Tailscale sees device and connection metadata only. | US / Canada | SCCs with UK Addendum; UK adequacy (Canada, commercial organisations) |
| Linear Orbit, Inc. (Linear) | Internal engineering and operations task tracking. We do not put customer call content or personal data in it. | US | SCCs with UK Addendum |
| Anthropic, PBC | AI language processing for support drafting and internal workflows. Not | US / EU | UK IDTA / SCCs with UK Addendum |

| Supplier | Purpose and data | Location | Transfer safeguard |
|---|---|---|---|
| | used for call recordings, transcripts or other call content. | | |
| OpenRouter, Inc. (and its underlying model providers) | AI model routing for some internal workflows. Not used for call recordings, transcripts or other call content. | US | UK IDTA / SCCs with UK Addendum |
| BT Wholesale (BT plc) | Number porting and call delivery. | UK | Not applicable (UK) |
| Acrobits s.r.o. | Softphone app (Members only). | EU (Czech Republic) | UK adequacy (EEA) |

We also share limited data with Ofcom, the emergency services and other lawful authorities where the law requires it. They are independent controllers, not our sub-processors.

## 3. Changes to this list

We will give customers at least 30 days' notice by email before adding or replacing a sub-processor, and update this page. Customers can object on reasonable data-protection grounds, as set out in clause 6 of the Data Processing Addendum . Questions: help@numbergroup.com .

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