

# Sub-processor list

Art 28 GDPR · Third parties processing on Outecho's behalf

v1.1  
September 2026

Outecho · Sarajevo, Bosnia and Herzegovina · Applies to all client engagements

## 01 SCOPE

This is the complete list of third parties that process personal data on Outecho's behalf in connection with its website and its client engagements. It satisfies the disclosure required by Art 28(2) and (4) GDPR.

Outecho holds no primary copies of client production data. Enquiries submitted through the website forms are transmitted by transactional email and are not retained in any Outecho database. Enquiries and the correspondence that follows them are retained in Outecho's Microsoft 365 environment, listed below. Client data reached during an engagement stays in the client's own systems.

Outecho's engineers are listed below as sub-processors. Engineers engaged as individual contractors are treated as sub-processors rather than as personnel, and are bound by written confidentiality and data protection terms equivalent to those Outecho owes the client.

## 02 SUB-PROCESSORS

| SUB-PROCESSOR                                        | PURPOSE AND DATA                                                                                                                                                                        | LOCATION                                        | TRANSFER BASIS                                                                                           |
|------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------|----------------------------------------------------------------------------------------------------------|
| <b>Resend</b><br>Plus Five Five, Inc.                | Transactional email delivery for the website forms — "Request CV" and "Describe your role". Name, company, business email and message content, transmitted only. Not stored by Outecho. | USA                                             | EU-US Data Privacy Framework (certified); SCCs Module Two also incorporated in Resend's DPA              |
| <b>Cloudflare Turnstile</b><br>Cloudflare, Inc.      | Bot and spam protection on the website forms. IP address, browser and device characteristics, and interaction signals used to distinguish human visitors from automated ones.           | USA · global edge network                       | EU-US Data Privacy Framework (certified); SCCs (Decision 2021/914) also incorporated in Cloudflare's DPA |
| <b>Vercel</b><br>Vercel Inc.                         | Website hosting and delivery. Server log data: IP address, timestamp, requested page, browser identifier.                                                                               | USA · hosting region<br>Washington, D.C. (iad1) | Standard Contractual Clauses (Decision 2021/914), Module Two, per Vercel's DPA                           |
| <b>Microsoft 365</b>                                 | Business email and document collaboration. Client contact details and correspondence.                                                                                                   | EU (Microsoft Ireland Operations Ltd)           | EU Data Boundary; onward transfers under the EU-US Data Privacy Framework                                |
| <b>Outecho engineering personnel and contractors</b> | Delivery of the contracted engineering services within the client's own systems. Categories of data as set out in the client agreement.                                                 | Bosnia and Herzegovina                          | Written confidentiality and data protection terms with Outecho; transfer tool as agreed with the client  |

Registered addresses and data protection contacts for each sub-processor are available on request.

## 03 NOTIFICATION AND OBJECTION

We notify clients at least 30 days before adding or replacing a sub-processor. Clients may object on reasonable data protection grounds.

Notice is given in writing to the client contact named in the agreement. Where a client objects, Outecho will not engage that sub-processor for that client's data and will propose an alternative. This list is maintained as changes occur and the current version is available at any time on request.

v1.1 — September 2026, superseding v1.0 (August 2026). Material changes are versioned and dated.

Issued by Outecho. Shared in confidence.

Outecho — Sarajevo / Vienna · benjamin@outecho.com · www.outecho.com