

LUMINANCE SUBPROCESSOR PAGE

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These are the subprocessors Luminance currently uses to provide the Product (including any additional features) and Support. This page is referenced by the Data Processing Addendum (“DPA”); if we add or replace a subprocessor we follow the notice and objection process in the DPA.

Sub-processor	Nature and purpose of processing	Categories of personal data	Location of processing
PRODUCT & CUSTOMER DATA HOSTING			
AWS	Cloud hosting of the Product and Customer Data.	Determined by the Customer. Any personal data contained in the Customer Data (documents) uploaded to the Product. For example, names, contact details, and any personal data within the Customer’s documents.	As set out in the Product Order Form, and in accordance with the locations at aws.amazon.com/compliance/sub-processors .
INFRASTRUCTURE PROVIDERS Customer Data is not sent to an external model provider.			
AWS	In-cloud Additional Generative Model processing.	Determined by the Customer. Any personal data contained in the inputs submitted to the feature utilising Additional Generative Models.	As set out in the Product Order Form, and in accordance with the locations at aws.amazon.com/compliance/sub-processors .
Microsoft Azure	In-cloud Additional Generative Model processing.	Determined by the Customer. Any personal data contained in the inputs submitted to the feature utilising Additional Generative Models.	Follows the hosting region set out in the Product Order Form: EU/UK if the Product is hosted in the EU/UK; otherwise an international location.
Google Cloud EMEA Limited	In-cloud Additional Generative Model processing.	Determined by the Customer. Any personal data contained in the inputs submitted to the feature utilising Additional Generative Models.	Follows the hosting region set out in the Product Order Form: EU/UK if the Product is hosted in the EU/UK; otherwise an international location.
GENERATIVE MODEL PROVIDERS Customer inputs are sent to the provider.			
OpenAI, L.L.C	Additional Generative Model processing, accessed via the provider’s API.	Determined by the Customer. Any personal data contained in the inputs submitted to the feature utilising Additional Generative Models.	United States
SUPPORT & OPERATIONS			
Luminance, Inc	24/7 support services.	Authorised users’ contact and account data (e.g. name, email), and any personal data the Customer includes in a support request.	United States
Luminance Technologies Australia Pty Limited	24/7 support services.	Authorised users’ contact and account data (e.g. name, email), and any personal data the Customer includes in a support request.	Australia
Intercom R&D Unlimited Company	Customer support tooling and communications.	Authorised users’ contact and account data (e.g. name, email), and any personal data the Customer includes in a support request.	European Union and/or United States (United States on request)
Mango Technologies, Inc. (ClickUp)	Support and operations tooling (ticketing and workflow).	Authorised users’ contact and account data (e.g. name, email), and any personal data the Customer includes in a support request.	European Union
OpenAI, L.L.C	Agentic workflows (Codex) used in the support of the Product	Authorised users’ contact and account data (e.g. name, email), and any personal data the Customer includes in a support request.	European Union

Categories of personal data. Because the Product processes documents and inputs supplied by the Customer, the Customer determines the categories of personal data processed. These may include special categories of personal data (Article 9 UK/EU GDPR) and personal data relating to criminal convictions and offences (Article 10). The Customer is responsible for establishing a lawful basis, and any additional conditions, for such processing.

International transfers. For any transfer of personal data outside the UK/EEA (including to the United States), Luminance relies on the transfer safeguards set out in the DPA (Standard Contractual Clauses and/or the EU-U.S., UK and Swiss Data Privacy Framework).