CLARISTA SUB-PROCESSOR LIST

Clarista engages certain Sub-processors in connection with providing the Platform Services or Support Services. A Sub-processor is a Clarista affiliate ("Clarista Affiliate") or a third party engaged by Clarista Inc. or a Clarista Affiliate to process personal data on behalf of Clarista's customers. Capitalized terms used herein have the same meaning as defined in the Agreement or this DPA.

This page is the Sub-processor List referred to in the Clarista Data Processing Addendum (US) and the Clarista Data Processing Addendum (International) (each, the "DPA"), as at the date stated below. Clarista updates it in accordance with Section 4.3 of the DPA.

For the avoidance of doubt, a Customer-Subscribed AI Service is not a Sub-processor of Clarista and is not listed below. See Section 2.7(a) of the DPA.

Third-party Sub-processors

Entity name	Registered address	Purpose	Country of processing	Transfer mechanism
Amazon Web Services, Inc. (a covered entity of the Amazon.com, Inc. Data Privacy Framework certification)	410 Terry Avenue North, Seattle, WA 98109, United States	Cloud service provider — hosting of the Clarista Control Plane and, where applicable, the Clarista Data Plane	Customer-selected AWS region(s). Where an EEA or UK region is selected, Customer Content is stored in that region.	Standard Contractual Clauses (2021) under the AWS GDPR Data Processing Addendum. Amazon.com, Inc. additionally maintains an active DPF self-certification (Non-HR Data; EU / UK / Swiss).
Microsoft Corporation	One Microsoft Way, Redmond, WA 98052, United States	Customer documents (Microsoft 365)	United States, subject to the Microsoft EU Data Boundary where applicable	Standard Contractual Clauses (2021) and the UK Addendum under the Microsoft Products and Services Data Protection Addendum. Microsoft Corporation additionally maintains an active DPF self-certification (HR and Non-HR Data; EU / UK / Swiss).
Microsoft Corporation	One Microsoft Way, Redmond,	Customer support	United States, subject to the	As above.

Entity name	Registered address	Purpose	Country of processing	Transfer mechanism
	WA 98052, United States	(Microsoft Teams)	Microsoft EU Data Boundary where applicable	
Anthropic, PBC	548 Market Street, PMB 90375, San Francisco, CA 94104, United States	AI model services (Claude Enterprise, including Claude Code) used by Clarista personnel to develop, test, troubleshoot and maintain Customer Applications and the Clarista Services. Personal Data may be processed where it appears in code, test data, logs or prompts. Under Anthropic's commercial terms, Customer data is not used to train Anthropic's models.	United States	Standard Contractual Clauses (2021) incorporated into Anthropic's Commercial Terms of Service through the Anthropic Data Processing Addendum.

Clarista Affiliates

The following entities are members of the Clarista group and may act as Sub-processors to provide the Clarista Services.

Entity name	Registered address	Purpose	Country of processing	Transfer mechanism
Clarista Inc.	20 McGuire Ct, Ridgewood, New Jersey, United States	Provision, support and operation of the Clarista Services	United States	EU–U.S. Data Privacy Framework and UK Extension (Non-HR Data), with

Entity name	Registered address	Purpose	Country of processing	Transfer mechanism
				the Standard Contractual Clauses applying to Swiss-origin Personal Data, to HR Data, and as automatic fallback under Section 8.3.
Clarista Technologies Pvt. Ltd.	#405, Fourth Floor BHAKTI GENESIS, Wakad Rd, Wakad, Pimpri-Chinchwad, Maharashtra 411057, India	Engineering, technical support and managed services. Access to Personal Data is by remote access to systems operated by Clarista Inc.; Personal Data is not stored locally in India.	India (remote access)	Intra-group data processing agreement between Clarista Inc. and Clarista Technologies Pvt. Ltd. incorporating the Standard Contractual Clauses (2021), Module Three (processor to processor), supported by a transfer impact assessment and the supplementary measures described in the Security Addendum. Clarista Technologies Pvt. Ltd. is a wholly owned subsidiary of Clarista Inc. and is within the scope of Clarista's SOC 2 Type II and ISO 27001 assessments.

Notes on the transfer mechanism column. Clarista's own Data Privacy Framework self-certification covers the transfer of Personal Data from the EEA and the United Kingdom to Clarista. It does not operate as a transfer mechanism for the onward disclosure of Personal Data by Clarista to a Sub-processor. For each onward disclosure, Clarista complies with the Accountability for Onward Transfer Principle as set out in Section 8.5 of the Clarista Data Processing Addendum (International), and the mechanism identified above is the instrument relied on to ensure that the Sub-processor is obligated to provide at least the same level of protection.

Last Modified: Oct 10, 2026