

Subprocessors List (Annex III to Data Processing Addendum)



This Annex forms part of the Data Processing Addendum (“DPA”) and sets out the Subprocessors authorized to process Personal Data on behalf of the Controller.

PYBK maintains a current list of Subprocessors and will update this Annex from time to time in accordance with the Agreement.

1. Authorized Subprocessors

This list represents all Subprocessors currently authorized to process Customer Personal Data in connection with the Services.

1.1 Infrastructure & Hosting

Subprocessor	Description of Processing	Categories of Personal Data	Location	Transfer Mechanism
Amazon Web Services, Inc.	Cloud infrastructure, hosting, storage, compute, networking	All Customer Data, including Personal Data contained in application data, documents, and metadata	Canada and/or United States (regionally deployed)	SCCs (where applicable)

1.2 Identity & Access Management

Subprocessor	Description of Processing	Categories of Personal Data	Location	Transfer Mechanism
Amazon Cognito (AWS)	Authentication, identity management, access control	User identifiers, authentication data, roles, access metadata	Canada and/or United States	SCCs

1.3 AI / Machine Learning Processing

Subprocessor	Description of Processing	Categories of Personal Data	Location	Transfer Mechanism
AWS Bedrock	AI model inference, retrieval-augmented generation (RAG), agent execution	Documents, prompts, structured project data (processed transiently)	United States and/or supported regions	SCCs
Amazon Textract	Document parsing and text extraction	Documents containing Personal Data	Canada and/or United States	SCCs
AWS Glue / AWS Lambda	Data transformation, enrichment, and processing pipelines	Extracted data, metadata, system-generated outputs	Canada and/or United States	SCCs

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Clarification:

AI services are used solely to provide the functionality of the Services. Customer Data is not used by PYBK to train foundation models provided by third parties.

1.4 Search & Retrieval

Subprocessor	Description of Processing	Categories of Personal Data	Location	Transfer Mechanism
Amazon OpenSearch Serverless	Indexing and retrieval of content and embeddings	Document content, metadata, embeddings	Canada and/or United States	SCCs

1.5 Graph Processing

Subprocessor	Description of Processing	Categories of Personal Data	Location	Transfer Mechanism
Amazon Neptune	Graph-based dependency and relationship processing	Task data, project metadata (may include Personal Data in context)	Canada and/or United States	SCCs

1.6 Analytics & Business Intelligence

Subprocessor	Description of Processing	Categories of Personal Data	Location	Transfer Mechanism
Amazon QuickSight (including Q)	Analytics dashboards and natural language querying	Aggregated and structured data, usage metrics	Canada and/or United States	SCCs

1.7 Storage & Data Processing

Subprocessor	Description of Processing	Categories of Personal Data	Location	Transfer Mechanism
Amazon S3 (AWS)	Object storage for documents and artifacts	Documents, extracted data, system artifacts, logs	Canada and/or United States	SCCs

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1.8 Monitoring, Logging & Security

Subprocessor	Description of Processing	Categories of Personal Data	Location	Transfer Mechanism
AWS CloudWatch	System monitoring and logging	Logs and system metadata (no document content by default)	Canada and/or United States	SCCs
AWS CloudTrail	Audit logging and compliance tracking	API activity, user activity, system events	Canada and/or United States	SCCs

1.9 Networking & Data Transfer

Subprocessor	Description of Processing	Categories of Personal Data	Location	Transfer Mechanism
AWS Networking Services (e.g., VPC, API Gateway)	Secure transmission, API handling, network isolation	Data in transit	Canada and/or United States	SCCs

1.10 Frontend Components

Subprocessor	Description of Processing	Categories of Personal Data	Location	Transfer Mechanism
DHTMLX Ltd.	Embedded UI components (e.g., Gantt, scheduling interfaces)	Task and scheduling data rendered client-side	End-user device (client-side)	SCCs

Clarification:

DHTMLX operates solely as an embedded client-side library. It does not independently collect, store, or transmit Customer Personal Data and does not act as a separate data processor.

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2. Safeguards and Controls

PYBK implements appropriate technical and organizational measures to ensure a level of security appropriate to the risk, including:

- **Contractual Controls**
All Subprocessors are bound by written agreements requiring confidentiality, data protection, and security obligations.
- **International Transfers**
Standard Contractual Clauses (SCCs) or equivalent safeguards are implemented where required.
- **Data Minimization**
Subprocessors are provided only the data necessary to perform their functions.
- **Encryption**
Data is encrypted in transit (TLS 1.2 or higher) and at rest (AES-256 or equivalent).
- **Access Controls**
Role-based access control (RBAC) and least-privilege principles are enforced.
- **Tenant Isolation**
Logical separation of Customer environments is maintained through application and infrastructure controls.
- **Monitoring & Audit**
Access and system activity are logged and monitored.
- **AI Processing Controls**
AI features operate within controlled environments, with safeguards designed to limit unnecessary data exposure and ensure processing aligns with the intended functionality of the Services.
- **Processing Scope & Duration**
Subprocessors process Personal Data only for the duration necessary to provide their services and in accordance with PYBK's documented instructions.

3. Subprocessor Changes

PYBK may update this list from time to time.

Where required:

- Customers will be notified of material changes to Subprocessors
- Notice will be provided in advance where reasonably practicable
- Customers may object to a new Subprocessor on reasonable data protection grounds
- PYBK will work in good faith to address such objections

4. Contact

For questions regarding subprocessors or data protection:

contact@pybk.ai