

List of Subprocessors pursuant to Art. 28(2) GDPR

Last updated: 22 May 2025

This list contains the subprocessors engaged by SoftBCom Berlin GmbH as part of data processing under Article 28 of the GDPR. It specifically applies to the operation and use of the **QAWacht SaaS platform**.

1. OpenAI, L.L.C.

Address: 3180 18th Street, San Francisco, CA 94110, USA

Service: Processing of anonymized conversation transcripts for AI-powered speech analysis (LLM – Large Language Model)

Data types: Only fully anonymized transcripts

Legal basis for third-country transfer: Standard Contractual Clauses pursuant to Art. 46 GDPR

Note: Prior to any transfer, transcripts are anonymized to remove all personal identifiers. **No personal data is transmitted.**

For inquiries or objections regarding the engagement of individual subprocessors, please contact: **contactsbc@softbcom.com**

Additional subprocessors may be added in the future and will be announced in advance in accordance with the DPA provisions.