

## Sana Sub-processors

Last updated: 11 February 2025

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### Scope

Capitalized terms used in this documentation are defined in Sana's [MSA](#) and/or [DPA](#). For each sub-processor that we use, we apply the principles of least privilege. This means that each third-party system shall only have access to the minimum data required to fulfill its purpose.

Many Services offer multiple alternative locations to process and/or store Subscriber Data. Except as set forth in the "Additional Details" column in the tables below, each cell listing countries in the table below represents an available "region" in which the sub-processor processes and/or stores data for a given purpose. When a Service offers alternative locations to process/and or store data, the Subscriber may be able to choose their region during the setup process or by working with a Sana Sales Representative. You may also request to have your Subscriber Data for a Service or feature hosted in a different region, which may be accommodated, subject to availability.

If you have any questions about where your data is stored that this documentation does not answer, please contact your Sana Sales Representative.

### Subscription to notifications

Any and all changes to the list of approved sub-processors will be posted at <https://sanalabs.com/download/legal/subprocessors.pdf> and will indicate the date the list was last updated. You may subscribe to notifications of a change of or new sub-processors for each applicable Service [here](#). If you subscribe, Sana will provide notification of any change of or new sub-processor(s) for the applicable Service.

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## SANA LEARN

Sub-processor	Legal Entity	Processing Purpose	Data categories	Location	Country	Safeguards for transfers	Additional Details
<b>Ably</b>	Ably Realtime Ltd. Fora 21-33 Great Eastern Street London, UK EC2A 3EJ	Real-time messaging	Device, Content, Activity	EEA/EU	Ireland	SCC incl. UK Addendum	
<b>Agora, Inc.</b>	Agora, Inc., 2804 Mission College Blvd., Santa Clara, CA 95054, USA	Audio video streaming	Content, Device, Activity	USA	USA	SCC incl. UK Addendum	Agora does not store any streaming data or user data except for caching for transmission purposes. No data is retained.
<b>Brevo - Sendinblue</b>	Sendinblue, 06 boulevard Haussmann 75008 Paris, France	Transactional mailing (Default email provider used for sending notifications, invites etc.)	User	EEA/EU	France Belgium	SCCs EU-US DPF	Brevo rents storage bays in datacenters in France. Data is stored within the cloud infrastructure provided by Google Cloud (GCP) in Belgium.
<b>Cloudinary</b>	Cloudinary Ltd., of 20 Aharon Bart St., Petah Tikva, 4951448, Israel	Content hosting	Content (Images, recordings)	USA (US customers) EEA/EU (EU customers)	USA Ireland Germany	SCC EU-U.S. DPF	Cloudinary has datacenters in multiple locations (US, EU and APAC), that will be used according to Sana's specific requirements. Cloudinary's default datacenter is based in the US.
<b>DeepL</b>	DeepL SE Maarweg 165 50825 Cologne Germany	Content translations	Content	EEA/EU	Finland Sweden	SCC	

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<b>Elevenlabs</b>	Eleven Labs Inc 69 Madison Ave 2484, New York, NY 10016	Content generation (Text to speech)	Content	Determined by User location: USA EEA/EU Singapore	USA Netherlands Singapore	EU-US DPF SCC incl. UK Addendum	Hosting is dependent on the user location. All data is transferred to the US for storage.
<b>Gladia</b>	Gladia, 38 rue de la Tremblaie 35510 Cesson-Sévigné, France	Recordings / Audio Transcription API	User, Content	EEA/EU	France	SCCs EU-US DPF	
<b>Google Cloud (GCP)</b>	Google Ireland Ltd., Gordon House Barrow Street Dublin 4 Ireland	Hosting infra Search Infra / Content generation	User, Content, Performance, Device, Activity	EEA/EU (default) USA (option for US customers)	Regional hosting at rest	SCC EU-U.S. DPF incl. UK Ext. Swiss-U.S. DPF	
<b>Intercom</b>	Intercom R&D Unltd. Co, Stephen Court, 18-21 St., Dublin 2, Ireland	Support, Interaction data	Support	EEA/EU	Ireland	SCC EU-US DPF	
<b>Microsoft Azure</b>	Microsoft Ireland Operations, Ltd. Dublin 18, D18 P521, Ireland	Search infra / Cloud Services	Content	EEA/EU	Regional hosting at rest	SCC incl. UK & Swiss Addendum EU-U.S. DPF incl. UK Ext. Swiss-U.S. DPF	
<b>OpenAI</b>	OpenAI Ireland Ltd., 117-126 Sheriff Street Upper, Dublin 1, D01 YC43, Ireland	Search infra / Content generation	Content	Worldwide with primary location in US	Worldwide routing	SCC incl. UK Addendum	Enterprise API in private instance and zero data retention. This implies that data bounces on OpenAI's APIs without any retention. No training of LLMs are allowed using Sana or Sana's customers data.
<b>Recall</b>	Hyperdoc Inc., 2261 Market Street #4339, San Francisco, CA	Meeting transcriptions and recordings	User, Content	EEA/EU	Germany	SCC incl. UK Addendum	

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<b>Synthesia</b>	Synthesia Ltd., Kent House, 14/17 Market Place, London, United Kingdom, W1W 8AJ	Video avatar generation	Content, Device, Activity	EEA/EU	Ireland	SCC incl. UK Addendum	Storage and processing is performed within the cloud infrastructure provided by Amazon Web Services (AWS).
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### SANA AI

Sub-processor	Legal Entity	Processing Purpose	Data categories	Location	Country	Safeguards for transfers	Additional Details
<b>Anthropic</b>	Anthropic PBC, 548 Market Street, PMB 90375, San Francisco, CA 94104, United States	Search and model infra	Content (Search queries)	USA	USA	SCC incl. Swiss & UK Addendum	Zero Data Retention configuration
<b>Cloudinary</b>	Cloudinary Ltd., of 20 Aharon Bart St., Petah Tikva, 4951448, Israel	Content hosting	Content (Images, recordings)	USA (US customers) EEA/EU (EU customers)	USA Ireland Germany	EU-US DPF SCC	Cloudinary has datacenters in multiple locations (US, EU and APAC), that will be used according to Sana's specific requirements. Cloudinary's default datacenter is based in the US.
<b>Gladia</b>	Gladia, 38 rue de la Tremblaie 35510 Cesson-Sévigné, France	Recordings / Audio Transcription API	User, Content	EEA/EU	France	SCC EU-US DPF	
<b>Google Cloud (GCP)</b>	Google Ireland Ltd., Gordon House Barrow Street Dublin 4 Ireland	Hosting infra Search Infra / Content generation	User, Content, Performance, Device, Activity	EEA/EU (default) USA (option for US customers)	Regional hosting at rest	SCC EU-U.S. DPF incl. UK Ext. Swiss-U.S. DPF	
<b>Intercom</b>	Intercom R&D Unltd. Co, Stephen Court,	Support, Interaction data	Support	EEA/EU	Ireland	SCC EU-US DPF	

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	18-21 St., Dublin 2, Ireland						
<b>Microsoft Azure</b>	Microsoft Ireland Operations, Ltd. Dublin 18, D18 P521, Ireland	Search infra / Cloud Services	Content	EEA/EU	Regional hosting at rest	SCC incl. Swiss & UK Addendum EU-U.S. DPF incl. UK Ext. Swiss-U.S. DPF	
<b>OpenAI</b>	OpenAI Ireland Ltd., 117-126 Sheriff Street Upper, Dublin 1, D01 YC43, Ireland	Search infra / Content generation	Content	Worldwide with primary location in US	Worldwide routing	SCC incl. UK Addendum	Enterprise API in private instance and zero data retention. This implies that data bounces on OpenAI's APIs without any retention. No training of LLMs are allowed using Sana or Sana's customers data.
<b>Recall</b>	Hyperdoc Inc., 2261 Market Street #4339, San Francisco, CA	Meeting transcriptions and recordings	User, Content	EEA/EU	Germany	SCC incl. UK Addendum	
<b>Twilio / SendGrid</b>	Twilio Ireland Limited, 3 Dublin Landings, North Wall Quay, Dublin 1, Ireland	Transactional emailing	User, Content	USA (US customers) EEA/EU (EU customers)	USA Ireland	EU-U.S. DPF SCC	
<b>Vespa</b>	Vespa.AI AS, Prinsensgate 49, 7011 Trondheim, Norway	Search infra	User, Content, Performance, Device, Activity	EEA/EU	Germany	SCC	