1. About this list

1.1 This page lists the sub-processors that Terahold S.r.l. ("Terahold") engages to process personal data on behalf of its customers, as provided in Section 10 and Appendix C of the Palasil Data Processing Agreement (the "DPA"). Palasil is a trademark used under licence by Terahold S.r.l. Capitalised terms not defined on this page have the meaning given in the DPA.

1.2 Part 1 applies to all customers. Part 2 applies only to customers with a Palasil Custom Agreement, for the Managed Services.

1.3 The lists in Sections 2 and 4 of this page have the same content as Appendix C of the DPA. This page is published in English and Italian; in case of conflict, Section 19.4 of the DPA applies.

2. Part 1: Service (all customers)

Sub-processor	Activity	Location	Transfer safeguard
Supabase Pte. Ltd. (Singapore), on Amazon Web Services infrastructure	Database, authentication, file storage	European Union, Frankfurt (eu-central-1); remote access for support possible from third countries	SCCs
Vercel Inc. (United States)	Hosting of the Platform and execution of server functions	European Union, Frankfurt (fra1) for server functions; global network for static content	EU-US Data Privacy Framework and SCCs
Contabo GmbH (Germany)	Application server of the AI agent and connection to OpenRouter; execution log kept for 14 days	European Union	Not applicable
OpenRouter, Inc. (United States)	Routing of requests to language models, with zero data retention	United States	SCCs
Inference Providers, engaged by OpenRouter (Section 3)	Execution of language models, with zero data retention and no training	Headquarters in the United States or in countries covered by an adequacy decision; servers possibly in other countries	SCCs through OpenRouter, or adequacy decision
Google, provider of Google Workspace (contracting entity under Google's terms for customers with a billing address in Italy: Google Cloud Italy S.r.l., Milan, Italy)	Email of the Platform sent from noreply@palasil.com, email communications with the customer and delivery of data exports on request (Google Drive)	Countries where Google and its sub-processors operate, including the United States	Google Cloud Data Processing Addendum: EU-US Data Privacy Framework or SCCs

Sub-processor	Activity	Location	Transfer safeguard
Amazon Web Services EMEA SARL (Luxembourg)	Storage of the logs of the database platform (Amazon S3)	European Union	Not applicable for storage in the European Union; SCCs of the AWS Data Processing Addendum for any transfer outside the European Economic Area

3. Inference Providers

3.1 Inference Providers are selected by OpenRouter for each request, within the following binding criteria, which Terahold maintains in the configuration of its OpenRouter account (Section 10.4 of the DPA):

a) zero data retention, which Terahold also requests in each request;

b) no use of the data for training, whether for paid or free models;

c) exclusion of providers with registered office in the People's Republic of China or controlled by a person or entity established there, of decentralised computing networks and of the other providers specifically excluded by Terahold, which at the date of this version are 20 in total; the list of excluded providers is available on request;

d) headquarters of the provider in the United States or in a country covered by an adequacy decision of the European Commission, as declared by OpenRouter.

3.2 On request to privacy@palasil.com, Terahold informs the customer, within 15 days, of the Inference Providers that processed the requests relating to its Brand Workspaces, as shown in the request records that OpenRouter makes available to Terahold at the time of the request.

4. Part 2: Managed Services (only customers with a Palasil Custom Agreement)

Sub-processor	Activity	Location	Transfer safeguard
Slack Technologies Limited (Ireland), Salesforce group, with Slack Technologies, LLC (United States)	Operational communication and assistance channel with the customer	Ireland and United States	EU-US Data Privacy Framework (Slack Technologies, LLC is covered by the Salesforce certification) and SCCs of the Salesforce Data Processing Addendum
Anthropic Ireland, Limited (Ireland)	AI assistant used by Terahold staff; no training on the content; standard retention, not zero	United States and other countries outside the European Economic Area	SCCs (Modules Two and Three) incorporated in Anthropic's Data Processing Addendum
n8n GmbH (Germany)	Workflow automations for the Managed Services, where needed to perform them	European Union	Not applicable

5. Services that are not sub-processors

5.1 Klaviyo, Shopify and the other accounts of the customer connected to Palasil or managed by Terahold under a Palasil Custom Agreement are services of the customer, provided under its own agreements: Terahold reads and writes data in them on the customer's behalf, but their providers are not sub-processors of Terahold. Stripe and the tools used for the inspiration feed process data for which Terahold is controller and are described in the Privacy Policy. The agent orchestration library used by the Platform runs on Terahold's infrastructure and does not transmit data to its developer. The AI image generation systems used in the Managed Services receive only images of products and texts, without personal data, and are not sub-processors.

5.2 Employees and individual collaborators of Terahold are not sub-processors: they process personal data as persons acting under the authority of Terahold (Article 29 GDPR), on Terahold's written instructions and under confidentiality obligations, only with accounts and tools of Terahold or of the customer. Their names are available on request (Section 10.6 of the DPA). Companies and professionals that process customer personal data with their own infrastructure are engaged only as sub-processors and listed on this page.

6. Changes and notifications

6.1 Terahold notifies the addition or replacement of a sub-processor listed by name on this page at least 30 days before the new sub-processor processes customer personal data, by email to the Owners of each Brand Workspace and by updating this page. Changes to Part 2 are notified only to customers with a Palasil Custom Agreement. Customers may object as provided in Section 10.3 of the DPA.

6.2 Changes that make the criteria for Inference Providers less protective are notified in the same way. Changes that increase protection, such as moving to a closed list of Inference Providers listed by name or to processing of model requests exclusively within the European Union, may be made by simple notice (Section 10.5 of the DPA).

6.3 Access by Terahold personnel from outside the European Economic Area is allowed only with Terahold's prior written authorisation and the safeguards of Section 11.2 of the DPA; information on the authorisations granted is available on request.

7. Change history

7.1 The current version of this list is published at palasil.com/legal/subprocessors, and the previous versions of the list remain available in the archive at palasil.com/legal/archive. The table below records each version and its change.

Version	Date	Change
1.0	29 October 2026	First publication