

Sprii Sub-Processor List

The sub-processors Sprii engages to process personal data on behalf of its customers

Referenced by, and forming part of, the Sprii Data Processing Addendum

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2 Document version

Version	Effective date	Summary of change	Material?
12 August 2026	01 December 2026	First version, split out from the DPA. Adds Mux, OpenRouter and its model providers, Anthropic, OpenAI, Render, Hetzner, ClickHouse, Decodo and TypeSafe AI; extends Google to further Google Cloud services.	Yes

Superseded versions are archived at sprii.io/legal/archive.

3 Purpose

This list names the sub-processors Sprii engages to process personal data on behalf of its customers. It is referenced by, and forms part of, the Sprii Data Processing Addendum (DPA). Customers give general written authorisation for these sub-processors under the DPA (GDPR Article 28(2)).

Each sub-processor is bound by data protection obligations equivalent to those in the DPA (Article 28(4)). This list is the single source of truth for the current sub-processors; it is maintained separately from the DPA so it can be kept current without re-issuing the DPA itself.

4 Current sub-processors

On commencement of the DPA, the customer authorises the engagement of the following sub-processors.

Entries whose purpose starts with “Optional” are used only when the customer switches on the feature that needs them. If the customer never switches that feature on, the sub-processor does not process the customer’s data.

4.1 Google (Firebase, Google Cloud)

Address: Gordon House, Barrow Street, Dublin 4, Ireland. Servers used by Sprii: in the EU, mainly St. Ghislain, Belgium, for the platform. Live-video servers run in the Google Cloud region nearest the customer’s streaming country, which can be outside the EEA.

Purpose and data: Firebase hosts Sprii’s software and database (purchase, product and comment data). Google Cloud also stores live-show recordings (Cloud Storage), holds viewing and order analytics, including viewer IP address and browser data (BigQuery), keeps service logs (Cloud Logging), runs live-video servers (Compute Engine) and, when the customer switches on live captions, transcribes the host’s voice (Speech-to-Text).

Transfer safeguard: Transfer to Google LLC (United States) under the EU-U.S. Data Privacy Framework, with EU Standard Contractual Clauses as a fallback safeguard.

Reference: firebase.google.com/terms/data-processing-terms (Firebase); cloud.google.com/terms/data-processing-addendum (Google Cloud).

4.2 Elasticsearch B.V.

Address: Keizersgracht 281, 1016 ED Amsterdam, The Netherlands. Servers used by Sprii: Frankfurt, Germany.

Purpose and data: Search engine enabling efficient search across large amounts of data, for example to find all orders relating to a specific customer. Processes customer orders and products.

Transfer safeguard: EU-hosted (Frankfurt). No third-country transfer for Sprii’s use.

Reference: www.elastic.co/trust

4.3 Mux, Inc.

Address: 1 Front Street, Suite 2050, San Francisco, CA 94111, USA (EU processing region enabled).

Purpose and data: Video infrastructure: encoding, storage, streaming and playback for live and on-demand video shown to end-users and viewers, plus playback analytics (Mux Data). Processes viewer IP and usage data; configured to the EU region with IP truncation.

Transfer safeguard: DPA in place; EU processing region; SCCs for any US transfer.

4.4 OpenRouter, Inc.

Address: 169 Madison Avenue #2404, New York, NY 10016, USA.

Purpose and data: AI gateway for the platform’s AI features: product reservations from comments, comment categorisation, sentiment and competition detection, and translation of live captions. Receives comment or caption text and an internal message ID only, never names or contact details, and routes only to the authorised model providers below. Zero data retention; no training on inputs or outputs.

Transfer safeguard: EU Standard Contractual Clauses (2021/914, Module Two) in the OpenRouter Data Processing Agreement, with the UK Addendum and a Swiss variant. Data hosted in Google Cloud US regions. SOC 2 Type II certified.

4.5 Authorised model providers engaged via OpenRouter

Providers: Google LLC (Gemini models); Anthropic (Claude models); OpenAI gpt-oss open-weight models, served by the inference hosting provider(s) selected by OpenRouter's routing and listed in OpenRouter's published sub-processor list, which is incorporated into this list by reference.

Purpose and data: Model inference on the comment text routed by OpenRouter, under the same restrictions: zero data retention, no training on inputs, processing limited to returning the analysis result.

4.6 Anthropic

Address: Anthropic Ireland, Limited, 6th Floor, South Bank House, Barrow Street, Dublin 4, Ireland (Sprii's contracting entity). Processing by its parent, Anthropic, PBC, 548 Market Street, PMB 90375, San Francisco, CA 94104, USA.

Purpose and data: Optional. AI assistant (Claude), used on the customer's request to turn campaign comment exports (display names and comment text) into campaign reports. Source files are deleted once the report is delivered, and within 30 days of export. Via Anthropic's API: no training on inputs and no retention of conversation content by default.

Transfer safeguard: EU Standard Contractual Clauses (2021/914, Module Three). Processing in the United States; Anthropic is not certified under the EU-U.S. Data Privacy Framework.

4.7 OpenAI

Address: OpenAI Ireland Limited, 1st Floor, The Liffey Trust Centre, 117-126 Sheriff Street Upper, Dublin 1, D01 YC43, Ireland (Sprii's contracting entity). Processing by OpenAI OpCo, LLC, 1455 3rd Street, San Francisco, CA 94158, USA.

Purpose and data: AI analysis of comment and chat text for the platform's AI features (categorisation, sentiment, competition detection) and, on the customer's request, sentiment analysis for a campaign brief. Inputs are limited to comment text with identifiers minimised: the brief route removes names and contact details, and automated features send a display name only where the feature needs it. No training on inputs. Automated features reach OpenAI models via OpenRouter. Sprii also calls the OpenAI API directly to read product information from customers' web pages, which involves no personal data. Campaign briefs use Sprii's managed ChatGPT Business workspace, where threads and exports are deleted once the brief is delivered, and within 30 days of export.

Transfer safeguard: EU Standard Contractual Clauses (2021/914, Module Three). OpenAI is not certified under the EU-U.S. Data Privacy Framework.

4.8 Render Services, Inc.

Address: 525 Brannan Street, Suite 300, San Francisco, CA 94107, USA (EU processing region: Frankfurt, Germany).

Purpose and data: Application hosting (platform-as-a-service) for Sprii services that process viewer data, including the live-stream graphics overlay, the TikTok live-comment listener and server-side rendering (comment text, display names, IP addresses, interaction data). Static front-end assets, which contain no personal data, are served from Render's global content delivery network.

Transfer safeguard: EU region (Frankfurt) for all hosted services; no third-country transfer of application data. The global content delivery network processes only request metadata such as IP addresses; for that, Render is certified under the EU-U.S. Data Privacy Framework (including the UK Extension and the Swiss-U.S. framework), with the Standard Contractual Clauses in Render's DPA as fallback.

4.9 Hetzner Online GmbH

Address: Hetzner Online GmbH, Industriestr. 25, 91710 Gunzenhausen, Germany (Amtsgericht Ansbach, HRB 6089).

Purpose and data: Live-video ingest (RTMP/SRT) and transcoding on Hetzner Cloud servers. Processes the broadcast video, which may show people, and connection metadata such as IP addresses. Processing is transient; nothing is stored there.

Transfer safeguard: EU-hosted (Nuremberg and Falkenstein, Germany; Helsinki, Finland). No third-country transfer. Data processing agreement in place under German law.

4.10 ClickHouse, Inc.

Address: 601 Marshall Street, Redwood City, CA 94063, USA. Servers used by Sprii: Frankfurt, Germany (AWS eu-central-1).

Purpose and data: Analytics database (ClickHouse Cloud, with managed Postgres) for reporting on orders and viewing. Holds a copy of order data, including end-users' names, addresses, email addresses and phone numbers, and viewing events linked to an end-user ID.

Transfer safeguard: EU-hosted (Frankfurt). Any access from the United States is covered by the EU-U.S. Data Privacy Framework, with EU Standard Contractual Clauses (2021/914) in ClickHouse's Data Processing Addendum as a fallback.

Reference: clickhouse.com/legal/agreements/data-processing-addendum

4.11 Decodo (UAB “Data troops”)

Address: Švitrigailos g. 34, Vilnius, Lithuania (company code 305893779).

Purpose and data: Optional. Proxy network that carries the connections Sprii makes to Instagram when the customer streams to Instagram through Sprii's streaming infrastructure, using the InstaSprii feature. The traffic includes Instagram usernames and comment text.

Transfer safeguard: EU company. Decodo's Data Processing Agreement applies, with EU Standard Contractual Clauses (2021/914) for any route outside the EEA.

Reference: decodo.com/legal/data-processing-agreement

4.12 TypeSafe AI, Inc.

Address: 255 California Street, Suite 1300, San Francisco, CA 94117, USA.

Purpose and data: Optional. AI moderation of the onsite chat and recognition of questions in comments, when the customer switches these features on. Processes chat display names and message text for moderation, and comment text only for question recognition.

Transfer safeguard: EU Standard Contractual Clauses (2021/914, Module Two) in TypeSafe's Data Processing Addendum. Processing in the United States.

Reference: typesafe.ai/legal/data-processing

Services that the customer connects to Sprii itself, such as its payment and shipping providers, its webshop platform and its own Meta and TikTok accounts, act on the customer's behalf under the customer's own agreements and are not Sprii's sub-processors.

Sprii is not entitled, without the customer's explicit written authorisation, to engage a sub-processor for a different processing than the one agreed, or to have another sub-processor perform the described processing.

5 How we change sub-processors, and how you object

Sprii will notify the customer of any planned change concerning the addition or replacement of a sub-processor, giving the customer the opportunity to object. Notice will reach the customer at least one month before the change takes effect.

If the customer objects, the customer must notify Sprii within 14 days of receiving the notice. The customer may object only on reasonable, concrete grounds relating to data protection. The parties will seek a resolution in good faith; if none is reached, the customer may terminate the part of the service affected by the sub-processor.

HOW WE NOTIFY

Until a dedicated privacy contact is registered per account, Sprii notifies the registered platform users on the account by email and posts the change on this list. Each notice names the sub-processor, its role and location, and the 14-day objection window.

6 Scope and conditions

This list is part of the Sprii DPA and is not a standalone contract. It is reviewed on every sub-processor change, and at least annually.