

Sub-Processor and Data Processing Agreement Register

CIATA DeepResearch

Document: DPA-REG-DR-2026-01 **Version:** 1.9 **Date:** 2026-10-08 **Status:** DRAFT — not yet reviewed by external counsel **Controller:** CIATA GmbH, Arnimallee 7, 14195 Berlin, Germany · HRB 266084 B · Amtsgericht Charlottenburg · Managing Director: Prof. Dr. Tim Landgraf · privacy@ciata.io **Product:** CIATA DeepResearch (research.ciata.io) **Register owner:** Managing Director, CIATA GmbH

Important notice: Only Staan's standard DPA is on file (since 2026-10-08, conclusion to be confirmed). No other Art. 28 DPA listed in this register has been executed. Every entry that requires an Art. 28 DPA is marked **pending execution — not on file**. This register simultaneously serves as the pre-launch DPA-execution checklist. Do not represent any instrument as concluded until execution is confirmed and the signed copy is filed at the location shown below.

How to Use This Register

This register must be kept current and accurate. Update it when any of the following occurs:

1. A new sub-processor is engaged — add an entry before processing begins and obtain the required DPA before any personal data is transferred.
2. A sub-processor's service scope changes — for example, if AKI.io begins using a new model or if Staan changes how it handles page content. A scope change that affects what personal data is processed, or how it is processed, requires a DPA amendment or new DPA annex.
3. A model-routing or configuration change at AKI.io — the DPA must expressly cover every model identifier through which customer data flows. Model identifiers are recorded in the scope-requirement field and must be updated on every routing change.
4. A DPA is executed — record the counterparty's document version, execution date, renewal date, and file location. Move the status from "pending execution" to "executed".
5. A sub-processor is removed — update the status and note the end date.
6. The register is reviewed annually in conjunction with the DPIA review cycle (next review: 2027-06-18).

Sub-processor changes and customer notice. CIATA's customer DPAs (Art. 28 agreements with CIATA's own customers) typically require CIATA to provide advance notice — commonly

30 days — before adding or replacing a sub-processor. Review each customer DPA for the applicable notice period and trigger a notification process before changing or adding any entry in this register.

What to Obtain for Each Pending Art. 28 DPA

Before marking any entry "executed", obtain and verify all of the following from the counterparty:

Item	Description
DPA / AVV document and version	The counterparty's current standard DPA or, where a negotiated agreement is used, the agreed final text with version number.
Sub-processor list	The counterparty's list of its own sub-processors (third parties the counterparty engages to help perform its services for CIATA). Review for any non-EEA processors and the transfer mechanism applicable to each.
Technical and Organisational Measures (TOM) annex	The counterparty's description of the security measures applied to CIATA's data — encryption, access controls, incident response, penetration testing cadence, certification status (ISO 27001, SOC 2, etc.).
Breach-notification commitment and deadline	The DPA must require the counterparty to notify CIATA without undue delay — and in any event within 24 hours — of any personal data breach affecting CIATA's data, to allow CIATA to meet its own 72-hour reporting obligation under Art. 33 GDPR.
Deletion and return on termination	The DPA must require the counterparty to delete (or, where agreed, return) all CIATA personal data on termination, and to provide written confirmation of deletion.
SCCs (where applicable)	Where the counterparty's sub-processors are located outside the EEA, ensure that appropriate Chapter V transfer safeguards (Standard Contractual Clauses or equivalent) are in place, documented, and annexed to the DPA.
Processor's DPA reference clause for no-retention / no-training	For AKI.io: the DPA clause that establishes (a) zero prompt retention and (b) prohibition on using CIATA data for model training. Record the clause number.

Register — Overview Table

The table below provides a one-line summary of each entry. Detailed entries with all required fields follow in individual sections.

#	Counterparty	Role	Instrument required	Status
1	AKI.io GmbH (Frankfurt, DE)	Art. 28 processor	Art. 28 DPA	Pending execution — not on file
2		Art. 28 processor		

#	Counterparty	Role	Instrument required	Status
	European Perspective SAS / Staan (Paris, FR)		Art. 28 DPA (Staan standard DPA)	On file; conclusion to be confirmed by counsel; gaps in OI-3, OI-4
3	Hetzner Online GmbH (Gunzenhausen, DE)	Art. 28 processor	Art. 28 DPA (Hetzner standard AVV)	Pending execution — not on file
4	Scaleway SAS (Paris, FR)	Art. 28 processor	Art. 28 DPA (Scaleway standard DPA, version of 1 June 2024)	Pending — to be accepted and filed
5	Mollie B.V. (Amsterdam, NL)	Art. 28 processor	Art. 28 DPA (Mollie standard DPA)	Pending execution — not on file
6	Billie GmbH (Berlin, DE)	Independent controller	Art. 13/14 disclosure	Not required — classification pending counsel confirmation
7	Qonto SAS (Paris, FR)	Independent controller	Art. 13/14 disclosure	Not required — classification pending counsel confirmation
8	Plausible (self-hosted, trc.ciata.io)	Not a third-party sub-processor	None	Not applicable
9	OpenObserve (planned — not yet enabled)	TBD (depends on hosting decision)	TBD	Planned — hosting decision open
10	Brevo SAS (Paris, FR) — former processor	Former Art. 28 processor	Art. 28 DPA	No DPA executed — wind-down in progress

Entry 1 — AKI.io GmbH

Field	Value
Counterparty — full legal name	AKI.io GmbH
Counterparty — address	Frankfurt, Germany (full registered address not yet confirmed — obtain at DPA execution)
Role	Art. 28 processor
Service provided	LLM inference — runs all research agents on CIATA's behalf using three models: gpt-oss-120b (reasoning agents: Decomposer, Re-decomposer, Query Generator, Evaluator, Entity Extractor, Scope Analyzer, Intent Classifier, Outliner, Glossary, Relevance Gate; Figure Sheet disabled by default); qwen3.8-27b (Synthesizer, Section Writer, Table Repair, Paragraph Checker, Consistency Checker, Report Patcher); gemma4-chat-26b (Extractor and Language Guard, reasoning disabled). All three models route through AKI.io infrastructure in Frankfurt. qwen3.6-chat-35b was in use for the Language Guard until 2026-09-27 and is no longer active.
Categories of personal data received	Research prompts containing: (a) the user's research question (text submitted by the authenticated user); (b) PII-filtered web page content (regex-scrubbed before transmission, capped at 16,000 chars/source); (c) derived search queries, sub-

Field	Value
	questions, and coverage data. No raw or unfiltered page content is sent; the PII filter runs before any LLM call.
Processing location	Frankfurt, Germany — EU jurisdiction; ISO 27001 certified data centre
Onward sub-processors	Not yet confirmed — obtain AKI.io's sub-processor list at DPA execution
Third-country transfers and safeguards	None — processing occurs within the EU. If AKI.io's own sub-processors include non-EEA entities, confirm SCCs or equivalent are in place.
Instrument required	Art. 28 DPA
DPA scope requirement	The DPA must expressly name the three model identifiers currently in use (gpt-oss-120b, qwen3.8-27b, gemma4-chat-26b) and must also cover past processing on qwen3.6-chat-35b (in use until 2026-09-27). The DPA must include: (a) a zero-prompt-retention clause; (b) a prohibition on using CIATA data for model training or fine-tuning; (c) a clause covering the non-streaming call pattern used by the bulk agents. Model routing is a configuration value revised as models are retired or outperformed — any future model change requires either a DPA amendment or written confirmation from AKI.io that the new model is covered. Record the clause references for (a) and (b) in this register once the DPA is executed.
Model change history	minimax-m2.5-230b was removed from all agents on 2026-07-26 (AKI.io retiring the model). The three models named at 2026-08-11 became four on 2026-09-13, when gemma4-chat-26b took over extraction (see version 1.3). On 2026-09-27, the Language Guard moved from qwen3.6-chat-35b to gemma4-chat-26b with reasoning disabled (issue #167, see version 1.7); qwen3.6-chat-35b is no longer used. Three models are now in use. Any DPA drafted from documentation predating 2026-07-26 covers the wrong processing.
Status	Pending execution — not on file
Counterparty's DPA version	Not on file
Execution date	None
Renewal / review date	To be set at execution — recommend annual review aligned with model-routing audit
Signed copy filed at	Not on file — file at: docs/compliance/signed_dpas/aki_io/ once executed
Register owner / responsible person	Managing Director, CIATA GmbH

Entry 2 — European Perspective SAS (Staan)

Field	Value
Counterparty — full legal name	European Perspective SAS (trading as Staas; the Ecosia and Qwant joint venture "European Search Perspective")
Counterparty — address	42 avenue de la Porte de Clichy, 75017 Paris, France · RCS Paris 928 439 785 · DPO: dpo@eu-searchperspective.com
Role	Art. 28 processor, per its DPA. The DPA (§2) states that search queries are not personal data and fall outside its scope.
Service provided	(a) Web search index queries — CIATA sends derived search queries (never the original research question verbatim) and receives URLs, titles, and snippets. (b) Server-side page fetch (full_content flow) — when STAAN_FULL_CONTENT=true (the production default), Staas fetches the full text of each result page server-side on CIATA's behalf and returns it as markdown. Web page content therefore passes through Staas's infrastructure before CIATA applies its own PII filter.
Categories of personal data received	(a) Derived search queries — may reflect the research topic but are not the user's verbatim question; Staas treats them as not personal data. (b) Full page text returned via full_content — may include personal data of individuals mentioned on scraped pages, prior to CIATA's PII filtering. CIATA applies its PII filter to all content returned by Staas before any storage or LLM submission.
Retention at Staas	Queries and market: 25 months; search ID: contract duration (DPA Appendix 1). full_content page text: not stated.
Processing location	OVH France (DPA §10)
Onward sub-processors	OVH France (hosting, France), Batch (client accounts, France), Notion (support tickets, US, SCCs; account and support data only). Changes are notified by email 20 days ahead, objection within 15 days (DPA §10).
Third-country transfers and safeguards	For queries: Staas's FAQ says an unnamed US fallback can supplement results; the DPA does not list it. CIATA asked Staas to switch it off for its account (issue #194). For account and support data: Notion (US) under SCCs.
Breach notification	Within 48 hours (DPA §9)
Audit	Allowed with 14 working days' written notice (DPA §8)
Instrument	StaaS's standard DPA, shown in the account console (staas.ai/console/dpa), "last update 2026", no signature step
Status	On file; conclusion to be confirmed by counsel (presumably concluded with the Terms of Service at registration)
Counterparty's DPA version	"Last update: 2026", copy saved 2026-10-08
Execution date	Not stated in the document
Renewal / review date	On any notified sub-processor change; annual
Copy filed at	

Field	Value
	docs/compliance/signed_dpas/staan/European Search Perspective - Staan - Data Processing Agreement.pdf
Register owner / responsible person	Managing Director, CIATA GmbH

Entry 3 — Hetzner Online GmbH

Field	Value
Counterparty — full legal name	Hetzner Online GmbH
Counterparty — address	Industriestr. 25, 91710 Gunzenhausen, Germany
Role	Art. 28 processor
Service provided	Cloud infrastructure hosting (Hetzner Cloud — shared virtualised infrastructure; not dedicated hardware), storage (two Docker volumes: ./runs for research data and job state; ./data for the SQLite database), and encrypted off-site backups geo-redundant within the EU (Hetzner Frankfurt → Helsinki). Hetzner provides physical and virtualised infrastructure only; it has no access to application-layer data content.
Categories of personal data received	All application data stored on CIATA's Hetzner infrastructure, including: user account data (email addresses, bcrypt-hashed passwords); research questions and generated reports; PII-filtered web page content (stored in runs/{job_id}/state.json); B2B billing profiles; withdrawal-consent records; payment transaction references; server and access logs. Hetzner does not process this data in any application sense — it stores it on behalf of CIATA.
Processing location	Germany (primary compute and storage); Helsinki, Finland (encrypted backup replica). Both are EU/EEA jurisdictions.
Onward sub-processors	Not confirmed — obtain Hetzner's sub-processor list
Third-country transfers and safeguards	None — Frankfurt and Helsinki are both EEA locations
Instrument required	Art. 28 DPA (Hetzner standard AVV / order-processing agreement — Hetzner publishes a standard AVV for Hetzner Cloud customers)
Known gap — disk encryption	Production volumes (./runs, ./data) are not encrypted at rest (confirmed 2026-07-15; no LUKS/dm-crypt or Hetzner volume-level encryption). This is a documented, accepted gap. Compensating controls: bcrypt-hashed passwords, TLS in transit, per-user application-level access isolation, automated 30-day retention, and the encrypted EU backup replica. Enabling volume-level at-rest encryption before the hot-production cutover is a recommended hardening step (DPIA action A1) that should be tracked separately. The DPA does not cure this gap — it must be addressed at the infrastructure level.

Field	Value
Status	Pending execution — not on file
Counterparty's DPA version	Not on file
Execution date	None
Renewal / review date	To be set at execution
Signed copy filed at	Not on file — file at: docs/compliance/signed_dpas/hetzner/ once executed
Register owner / responsible person	Managing Director, CIATA GmbH

Entry 4 — Scaleway SAS

Field	Value
Counterparty — full legal name	Scaleway SAS
Counterparty — address	8 rue de la Ville l'Evêque, 75008 Paris, France
Counterparty — registration	RCS Paris 433 115 904. Subsidiary of the French iliad Group (approximately 96 %).
Role	Art. 28 processor
Service provided	Transactional email delivery via the Scaleway Transactional Email product ("TEM"), region fr-par. Four mail types are in scope: (a) email address verification messages at account registration; (b) password reset messages; (c) purchase confirmation emails on credit pack completion; (d) report-ready notification emails (added with issue #159, live since 2026-09-26). No marketing or newsletter use. Sending domain: ciata.io, verified with Scaleway (SPF, DKIM, DMARC). Provider selected via the EMAIL_PROVIDER=scaleway environment variable. No open or click tracking (TEM does not rewrite links).
Categories of personal data received	(a) Email verification: recipient email address, name if given, verification link. (b) Password reset: recipient email address, name if given, reset link. (c) Purchase confirmation: recipient email address, name, purchase details (credits purchased, pack label, price, new credit balance, Mollie payment reference, purchase date). (d) Report ready: recipient email address, name if given, report title, a short summary of the report (first paragraph of the executive summary, up to approximately 500 characters), link to the report, the report's deletion date. Note on report-ready mail: it carries research content (title and summary). Professional-secrecy holders (e.g. law firms, §203 StGB) can disable this mail in account Notifications; the report itself remains on CIATA's servers.
Processing location	fr-par (Paris, France; EU). Scaleway's TEM FAQ states that all data is hosted and processed within the European Union and that no transfers outside the EU occur.

Field	Value
Onward sub-processors	Sub-processor list at https://www.scaleway.com/en/subprocessorlist/ (last reviewed July 2025). Includes data-centre colocation operators headquartered in the US (Equinix EMEA, Iron Mountain, Digital Realty), each listed with EU processing locations only; none is expressly named for Transactional Email. Scaleway's data-centre unit Opcore has been 50 % owned by InfraVia Capital Partners (France/Luxembourg) since March 2025.
Third-country transfers and safeguards	None identified per Scaleway (fr-par; EU-only processing stated). <u>△</u> TO CONFIRM: Whether the US-headquartered colocation operators named in Scaleway's sub-processor list (Equinix EMEA, Iron Mountain, Digital Realty) could create a third-country transfer risk — they provide the buildings and Scaleway runs its own hardware in them — is a question for counsel.
Instrument required	Art. 28 DPA. Scaleway publishes a standard Data Processing Agreement, version of 1 June 2024, covering all Scaleway services; TEM is not carved out. URL: https://www-uploads.scaleway.com/DPA_2024_ENG_b0abb5cc26.pdf
Status	Pending — to be accepted and filed
Counterparty's DPA version	Scaleway standard DPA, version of 1 June 2024
Execution date	None
Renewal / review date	To be set at acceptance
Signed copy filed at	Not yet filed — file at: docs/compliance/signed_dpas/scaleway/ once accepted
Certifications	ISO/IEC 27001:2022, BSI certificate IS 787020, scope "Providing the technical infrastructure platform to support the Scaleway's Public Cloud products", valid until 2026-12-05. HDS (health data hosting) certified. SecNumCloud qualification in progress, not yet obtained.
Register owner / responsible person	Managing Director, CIATA GmbH

Entry 5 — Mollie B.V.

Field	Value
Counterparty — full legal name	Mollie B.V.
Counterparty — address	Keizersgracht 313, 1016 EE Amsterdam, Netherlands
Role	Art. 28 processor
Service provided	Payment processing for credit pack purchases — CIATA initiates payment sessions via the Mollie API; Mollie collects payment instrument details (card, SEPA, iDEAL, etc.) from the buyer and processes the transaction. CIATA does not receive or store

Field	Value
	card numbers or bank account details. Mollie also hosts the Billie B2B BNPL method within its checkout (see Entry 6).
Categories of personal data received	Payment amount, currency, description, and metadata (user_id, pack_id, credits, locale). Where the buyer selects the Billie payment method in the Mollie checkout, the buyer's full billing address is also passed to Mollie/Billie for credit underwriting (see Entry 6). CIATA retains only Mollie payment references (Mollie payment ID) and pack metadata — no card or bank account data is stored by CIATA.
Processing location	Amsterdam, Netherlands (EU)
Onward sub-processors	Billie GmbH (Berlin, DE) — embedded in Mollie checkout as a B2B BNPL option; see Entry 6. Other Mollie sub-processors not confirmed — obtain Mollie's sub-processor list.
Third-country transfers and safeguards	None asserted — EU/EEA processing (NL). Confirm at DPA execution.
Instrument required	Art. 28 DPA (Mollie publishes a standard DPA)
Retention note	Mollie retains payment records for its own regulatory, fraud-prevention, and financial-reporting obligations, independently of CIATA's 30-day retention schedule. CIATA separately retains its own transaction references in its SQLite database for the § 147 AO period. △ Note for counsel: § 147 AO obliges CIATA to retain its own books and records; a processor's parallel retention does not obviously discharge that duty. Please confirm what CIATA must hold itself, and in what form, rather than relying on Mollie's records.
Status	Pending execution — not on file
Counterparty's DPA version	Not on file
Execution date	None
Renewal / review date	To be set at execution
Signed copy filed at	Not on file — file at: docs/compliance/signed_dpas/mollie/ once executed
Register owner / responsible person	Managing Director, CIATA GmbH

Entry 6 — Billie GmbH

Field	Value
Counterparty — full legal name	Billie GmbH

Field	Value
Counterparty — address	Berlin, Germany (full registered address not yet confirmed)
Role	Independent controller — not an Art. 28 processor of CIATA
Service provided	B2B invoice / Net-30 Buy-Now-Pay-Later (BNPL) financing — embedded in the Mollie checkout as an optional payment method. Billie makes its own credit underwriting decision based on the buyer's business identity data. Billie is reached via Mollie's checkout integration, not via a direct CIATA API integration.
Trigger	Activated only when the buyer selects the Billie payment method. Not involved in standard card or SEPA purchases.
Categories of personal data received	Buyer's given name, family name, organisation name, billing street address, city, postal code, country, Handelsregister registration number, and VAT-IdNr. These are required by Billie for its credit underwriting process. Data is transmitted through Mollie's checkout flow.
Processing location	Berlin, Germany (EU)
Third-country transfers and safeguards	None asserted — EU processing
Instrument required	None (Art. 13/14 disclosure)
Rationale for independent-controller classification	Billie makes its own BNPL credit decision in its own name and for its own underwriting, anti-fraud, and regulatory purposes. It retains buyer data independently of and beyond CIATA's retention schedule. CIATA does not direct or instruct Billie's processing. On this analysis no Art. 28 DPA is required; CIATA's obligation is Art. 13/14 transparency to data subjects, met via the public privacy policy (\$6 of /privacy.html).
Classification status	Pending counsel confirmation — see Open Items
Status	Not required (independent controller) — pending counsel confirmation of classification
Counterparty's DPA version	Not applicable
Execution date	Not applicable
Signed copy filed at	Not applicable
Register owner / responsible person	Managing Director, CIATA GmbH

Entry 7 — Qonto SAS

Field	Value
Counterparty — full legal name	Qonto SAS
	Paris, France (full registered address not yet confirmed)

Field	Value
Counterparty — address	
Role	Independent controller — not an Art. 28 processor of CIATA
Service provided	VAT-compliant invoice generation for every completed credit pack purchase. Qonto creates or matches a client record and generates a finalised invoice on CIATA's behalf. Called from <code>src/api/qonto_invoicing.py</code> for every completed purchase.
Trigger	Called for every completed credit pack purchase — not limited to any particular payment method.
Categories of personal data received	Buyer name (given and family), email address, full billing address (where provided), VAT number (where provided), Mollie payment ID.
Processing location	Paris, France (EU)
Third-country transfers and safeguards	None asserted — EU processing
Instrument required	None (Art. 13/14 disclosure)
Rationale for independent-controller classification	Qonto is a licensed payment institution that issues invoices in its own name, retains invoicing data for its own French accounting and tax-compliance obligations (French commercial law: minimum 10-year retention), and acts independently of CIATA's instructions for those purposes. On this analysis no Art. 28 DPA is required; CIATA's obligation is Art. 13/14 transparency, met via the public privacy policy (§6 of /privacy.html).
Classification status	Pending counsel confirmation — see Open Items. Written confirmation of Qonto's role can optionally be sought via dpo@qonto.com .
Status	Not required (independent controller) — pending counsel confirmation of classification
Counterparty's DPA version	Not applicable
Execution date	Not applicable
Signed copy filed at	Not applicable
Register owner / responsible person	Managing Director, CIATA GmbH

Entry 8 — Plausible Analytics (self-hosted)

Field	Value
Counterparty	Plausible Analytics — self-hosted instance operated by CIATA at trc.ciata.io
Role	Not a third-party sub-processor

Field	Value
Service provided	Cookie-free, privacy-preserving aggregate web analytics. CIATA operates its own Plausible instance on CIATA-controlled Hetzner infrastructure. No data is sent to Plausible's own servers or to any third party.
Categories of personal data received	None. Page-view counts, referrer statistics, and click-level conversion events (event name and URL only) are collected. No IP addresses are stored by the self-hosted instance. No cookies are set. No personal data is processed.
Processing location	trc.ciata.io — Hetzner Cloud DE — CIATA-controlled
Third-country transfers	None
Instrument required	None — no Art. 28 DPA required; Plausible is CIATA-operated infrastructure
Status	Not applicable
Reason for inclusion	Included so that a reviewer does not conclude this entry was overlooked. Disclosure of self-hosted Plausible analytics appears in the public privacy policy (/privacy.html §11).
Register owner / responsible person	Managing Director, CIATA GmbH

Entry 9 — OpenObserve (planned — not yet enabled)

Field	Value
Counterparty	OpenObserve — hosting entity TBD
Role	TBD — depends on hosting decision (see below)
Service provided	Performance metrics ingestion and query. The <code>src/perf.py</code> module implements an OpenObserve export: when <code>OPENOBSERVE_API_KEY</code> , <code>OPENOBSERVE_ORG</code> , and <code>OPENOBSERVE_STREAM</code> environment variables are set, two record types are shipped via HTTP to an OpenObserve instance: performance records (function name, duration in milliseconds, success/failure status, and the exception string on failure) and counter records (a metric name from a fixed set defined in source, a numeric value, and optionally <code>job_id</code> , a locale code, a line count or a short reason code). Model names are not transmitted. The module logs "OpenObserve is disabled" when the environment variables are absent. As at 2026-08-11, these variables are not set in the production environment; the export is effectively disabled.
Categories of personal data that would be received	If enabled: <code>job_id</code> values (opaque identifiers linked to user accounts in CIATA's database), function names, duration metrics, status codes, and the label fields passed to <code>track_metric()</code> . The <code>job_id</code> is a pseudonymous identifier — it references a user account — and should be treated as personal data for DPA purposes. [△] The performance record also carries the raw exception string on failure; exception messages are not intended to contain user data but this cannot be categorically excluded, so scrubbing or dropping that field before enabling is an open engineering decision.
Processing location	TBD — depends on whether OpenObserve is self-hosted on CIATA infrastructure or run as a managed cloud service

Field	Value
Hosting decision and classification	Self-hosted on CIATA infrastructure (e.g., same Hetzner server): OpenObserve would not be a third-party sub-processor; no Art. 28 DPA would be required (analogous to Entry 8 — Plausible). The OPENOBSERVE_BASE_URL defaults to <code>http://localhost:5080/api</code> , consistent with local/self-hosted deployment. Managed cloud instance (e.g., OpenObserve Cloud): OpenObserve would be a third-party processor; an Art. 28 DPA would be required before enabling, and the hosting location and transfer basis would need to be documented in this register.
Instrument required	TBD — none if self-hosted; Art. 28 DPA if managed cloud
Status	Planned — not currently enabled. Hosting decision is open. Do not enable the export in any environment until the hosting decision is made and, if a managed service, the DPA is executed and recorded here.
Counterparty's DPA version	Not applicable until decision made
Execution date	None
Signed copy filed at	Not applicable until decision made — if required, file at: docs/compliance/signed_dpas/openobserve/
Register owner / responsible person	Managing Director, CIATA GmbH

Entry 10 — Brevo SAS (former processor)

Field	Value
Counterparty — full legal name	Brevo SAS (formerly Sendinblue SAS)
Counterparty — address	106 boulevard Haussmann, 75008 Paris, France
Role	Former Art. 28 processor — active until EMAIL_PROVIDER switches to scaleway (2026-09-26). Brevo code remains in the codebase as a rollback path (EMAIL_PROVIDER=brevo), but no personal data is sent to Brevo after the switch.
Service provided	Transactional email delivery until the switch to Scaleway (issue #152, effective 2026-09-26): (a) email address verification messages; (b) password reset messages; (c) purchase confirmation emails; (d) report-ready notification emails during the crossover period between the deployment of commit d1f9449 (2026-09-26) and the provider switch (issue #159). No marketing or newsletter use.
Categories of personal data received	Recipient email address; buyer name (given and family name, where held); purchase details (credits purchased, pack label, price, new credit balance, Mollie payment reference, purchase date); verification and password-reset links. Report title and summary were also transmitted via the report-ready mail during the crossover period between d1f9449 and the provider switch. Brevo holds sending logs of all messages it delivered until the switch.

Field	Value
Processing location	Paris, France (EU). Brevo operates both EU and US data centres. EU data residency was never confirmed as selected in CIATA's Brevo account — see Open Item OI-6.
Onward sub-processors	Not confirmed.
Third-country transfers and safeguards	Conditional on EU data residency having been active in CIATA's Brevo account during the period of use. If EU residency was not selected, emails and associated logs processed up to the switch may have been processed on US infrastructure, constituting an EEA → US transfer without an Art. 46 mechanism. See Open Item OI-6.
Instrument required	Art. 28 DPA (Brevo publishes a standard DPA for its customers). No DPA was executed.
Status	No DPA executed — wind-down in progress. Planned: after stable operation of the Scaleway path, close the Brevo account and formally request deletion of sending logs and contact records; record the deletion confirmation in this entry.
Counterparty's DPA version	Not on file
Execution date	None
Renewal / review date	Not applicable — processor relationship ended
Signed copy filed at	N/A — no DPA executed
Register owner / responsible person	Managing Director, CIATA GmbH

Open Items

The following items require a decision from counsel or a confirmation from a counterparty before this register can be considered settled. No instrument should be represented as concluded, and no processing relying on an outstanding open item should be described as GDPR-compliant, until the item is resolved.

#	Item	Category	Blocking?	Action required
OI-1	AKI.io DPA — full model coverage	DPA execution	Yes — blocks production use claim	Confirm that the executed DPA expressly names the three model identifiers currently in use (gpt-oss-120b, qwen3.8-27b, gemma4-chat-26b) and also covers past processing on qwen3.6-chat-35b (in use until 2026-09-27). Any DPA drafted from documentation predating 2026-07-26 covers minimax-m2.5-230b instead and must be corrected.

#	Item	Category	Blocking?	Action required
				Record clause references for no-retention and no-training commitments.
OI-2	AKI.io DPA — no-retention and no-training clause references	DPA execution	Yes	Identify and record the specific clause(s) in the executed AKI.io DPA that establish (a) zero prompt retention and (b) prohibition on using CIATA data for model training or fine-tuning.
OI-3	Staan DPA — full_content flow not covered	DPA scope	Yes — production default uses full_content	The Staas DPA (on file) does not mention the server-side full_content page fetch. Ask Staas to confirm it in writing, or switch STAA_FULL_CONTENT off.
OI-4	Staan keeps queries 25 months; US fallback	DPA scope	Yes — our zero-retention and EU-only statements depend on it	The DPA keeps queries for 25 months and calls them not personal data. Staas's FAQ names a US fallback the DPA does not list. Ask Staas to switch the fallback off (issue #194) and, if possible, to obfuscate or not keep CIATA's queries. Counsel: can derived queries be personal data for CIATA?
OI-5	Staan — registered address and onward sub-processors	Register completeness	Resolved 2026-10-08	Recorded in Entry 2 from the DPA and Staas's legal notice. Ecosia and Qwant are not listed as sub-processors.
OI-6	Brevo SAS — historical EU data residency and wind-down	Transfer risk / processor end-of-life	Yes — potential historical EEA → US transfer if EU residency was never selected	EU data residency in CIATA's Brevo account was never confirmed as selected. If it was not selected, emails and their logs processed up to the switch (2026-09-26) may have been processed on US infrastructure, constituting an EEA → US transfer without an Art. 46 mechanism. Action: (a) determine whether EU data residency was active during the period of use; (b) after stable operation of the Scaleway path, close the Brevo account and formally request deletion of sending logs and contact records; (c) record the deletion confirmation in Entry 10.
OI-7	Billie GmbH — independent-controller classification	Legal classification	No — but required before final reliance on Art. 13/14 only	Confirm with external counsel that Billie GmbH is correctly classified as an independent controller for its BNPL credit decision reached via Mollie's checkout. If counsel concludes Billie is a processor for any flow, obtain the corresponding Art. 28 DPA.
OI-8	Qonto SAS — independent-controller classification	Legal classification	No — but required before final	Confirm with external counsel that Qonto SAS is correctly classified as an independent controller for the invoice records it issues. Written confirmation can optionally be

#	Item	Category	Blocking?	Action required
			reliance on Art. 13/14 only	sought directly from Qonto at dpo@qonto.com.
OI-9	OpenObserve – hosting decision	Architecture / DPA	No – export is currently disabled	Decide whether OpenObserve will be self-hosted on CIATA infrastructure (no DPA required; update this entry accordingly) or run as a managed cloud service (DPA required before enabling; update with counterparty details and instrument status). Do not enable the export until the decision is recorded here.
OI-10	AKI.io GmbH – full registered address	Register completeness	No – housekeeping	Obtain and record AKI.io GmbH's full registered address and company registration details for the DPA cover page.
OI-11	Billie GmbH and Qonto SAS – full registered addresses	Register completeness	No – housekeeping	Obtain and record full registered addresses for Billie GmbH and Qonto SAS.
OI-12	Customer DPA advance-notice obligation	Contractual	Yes – affects process for any sub-processor change	Review each customer DPA to determine the required advance-notice period before adding or replacing a sub-processor. Document the notice period and build it into the sub-processor change process.
OI-13	DPO designation	Regulatory	Yes – may be mandatory (see DPIA §1.1)	Confirm with external counsel whether CIATA GmbH is required to designate a Data Protection Officer under Art. 37 GDPR and / or § 38(1) BDSG. The DPIA notes that the DPIA-necessity and DPO-necessity questions may stand or fall together under § 38(1) sentence 2 BDSG. If a DPO is required or voluntarily designated, add name and contact details to this register and to the Art. 30 records.
OI-14	All Art. 28 DPAs – breach-notification deadline	DPA content	Yes	Verify that each executed DPA requires the processor to notify CIATA within 24 hours of a personal data breach, to allow CIATA to meet its own 72-hour Art. 33 GDPR deadline. Record the clause reference for each.
OI-15	All Art. 28 DPAs – deletion on termination	DPA content	Yes	Verify that each executed DPA requires the processor to delete (or return) all CIATA personal data on termination and to provide written confirmation of deletion. Record the clause reference for each.
OI-16	Scaleway SAS DPA – acceptance and filing	DPA execution	Yes – blocks production use claim	Accept the Scaleway standard DPA (version of 1 June 2024; https://www-uploads.scaleway.com/DPA_2024_ENG_b0abb5cc26.pdf) and file the accepted version at docs/compliance/

#	Item	Category	Blocking?	Action required
				signed_dpas/scaleway/. OI-14 (breach-notification deadline, 24 hours) and OI-15 (deletion on termination) apply to this DPA and must be verified against it before the status is updated from "Pending" to "executed".

Version History

Version	Date	Author	Summary
1.8	2026-09-27	CIATA GmbH (Managing Director)	Consistency Checker added (issue #172): runs in parallel with the Paragraph Checker on qwen3.8-27b; no new model, processor or data category; two additional LLM calls per report. Entry 1 (AKI.io) service description updated: Consistency Checker added to the qwen3.8-27b agent list.
1.7	2026-09-27	CIATA GmbH (Managing Director)	Language Guard moves from qwen3.6-chat-35b to gemma4-chat-26b with reasoning disabled (issue #167). qwen3.6-chat-35b is no longer used in any agent; three models now in use (gpt-oss-120b, qwen3.8-27b, gemma4-chat-26b). Failed repairs now remove leaked characters in code rather than keeping the line. Entry 1 (AKI.io) service description, DPA scope requirement, model change history, and OI-1 updated accordingly.
1.6	2026-09-26	CIATA GmbH (Managing Director)	Transactional email moves from Brevo SAS to Scaleway SAS (issue #152, live 2026-09-26): Entry 4 replaced with Scaleway SAS (status: Pending — to be accepted and filed); Brevo SAS added as Entry 10 (former processor, no DPA executed, wind-down in progress). Report-ready notification email (issue #159, live 2026-09-26) adds report title and summary to the data categories received by the active email provider (Entry 4). OI-6 replaced with Brevo historical processing and wind-down item; OI-16 added for Scaleway DPA acceptance and filing.
1.5	2026-09-15	CIATA GmbH (Managing Director)	The Figure Sheet call (added in 1.4) is disabled by default in the same day's second deployment (research.figure_sheet: false): it made no measurable difference to reports and could mislead the writer. No call is made unless an operator enables it. Model set, data categories and recipient unchanged.
1.4	2026-09-15	CIATA GmbH (Managing Director)	Report writing moved to per-section writing on 2026-09-15 (commit 466a41b, issue #136): the Section Writer on qwen3.8-27b writes one topic section per call, supported by a Glossary call on gpt-oss-120b. A Figure Sheet call on gpt-oss-120b is added with issue #139, and the Paragraph Checker now retries a failed batch once. All three calls process the research question and excerpts of the run's findings, which the Outliner and the Synthesizer already receive. No new model identifier, same data categories, same recipient (AKI.io GmbH, Frankfurt): the four-model DPA scope is unchanged.

Version	Date	Author	Summary
1.3	2026-09-13	CIATA GmbH (Managing Director)	Model routing revised for run time (issue #135): the Relevance Gate moves from qwen3.6-chat-35b to gpt-oss-120b (same verdicts on 192 replayed results, 4.5x faster) and the Extractor from qwen3.6-chat-35b to gemma4-chat-26b with reasoning disabled (5x faster, more and better-grounded findings on 40 real pages). gemma4-chat-26b is a NEW model identifier — a fourth model now processes customer data (PII-filtered page excerpts) — so the DPA scope must name four models; qwen3.6-chat-35b remains in service for the Language Guard only. Same data categories, same recipient (AKI.io GmbH, Frankfurt).
1.2	2026-09-12	CIATA GmbH (Managing Director)	Post-synthesis verification restructured (issue #133): the Fact Checker — a whole-report check plus a per-citation alignment check, both on gpt-oss-120b — is replaced by the Paragraph Checker, and the Report Patcher is given its own routing; both now run on qwen3.8-27b. Same data categories (the draft report and the run's findings), same recipient (AKI.io GmbH), no new model identifier: the three-model set and the DPA scope instruction are unchanged.
1.1	2026-09-10	CIATA GmbH (Managing Director)	Synthesis model corrected from mistral4-119b to qwen3.8-27b, in service since 2026-08-23 (commit eb2a5b1); the Table Repair agent, added 2026-09-10, runs on that same model and introduces no new recipient. DPA scope instructions corrected in step. A DPA drafted from v1.0 would not have named the model that writes every report.
1.0	2026-08-11	CIATA GmbH (Managing Director)	Initial draft — nine entries; all Art. 28 DPAs pending execution; Billie and Qonto recorded as independent controllers pending counsel confirmation; Plausible recorded as not a third-party sub-processor; OpenObserve recorded as planned with open hosting decision; 15 open items identified

This register is an internal working document. It has not been reviewed by external legal counsel. It is not a substitute for legal advice. Treat all status entries as provisional until external review is completed and all open items are resolved.