COMPLETA

Completa Sub-processor List

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This list is Schedule 1 (Subprocessor Register) of the Data Processing Agreement.

Provided by B2wise Holdings Ltd, a company registered in England and Wales (company number 15488673), registered office 23 St. Johns, Enderby, Leicester, England, LE19 2BR ("Completa", "we"). Contact and formal notices: legalnotices@b2wise.com.

Register current as at November 2026. An identified provider is a subprocessor only to the extent it processes Customer personal data on Completa's behalf. Planned changes are not represented as already operational and planned providers may not process Customer personal data until engaged under Section 5.

1. Cloudflare, Inc.

Purpose	Website, app and MCP server hosting, database and file storage
Data processed	Account details, app code, encrypted credentials, app data and files stored by apps
Status / notes	Current

2. Fly.io, Inc.

Purpose	App and algorithm hosting
Data processed	Customer data in use while an app or algorithm runs
Status / notes	Current

3. Okta, Inc. (Auth0)

Purpose	User sign-in and single sign-on
Data processed	Name, email address, sign-in events
Status / notes	Current

4. ClickHouse, Inc.

Purpose	Analytics database
Data processed	Analytics data
Status / notes	Current

5. Mailgun Technologies, Inc. (Sinch)

Purpose	Email delivery
Data processed	Recipient email addresses and message content

Status / notes	Current

6. GitHub, Inc. (Microsoft)

Purpose	Source code storage and deployment
Data processed	App and algorithm code
Status / notes	Current; Customer personal data should not be stored in source code or deployment repositories except where strictly necessary and authorised under the Agreement

7. Anthropic, PBC

Purpose	Automated review of app code built through the MCP server, for business-rule checks and defect detection; business data held in apps is not sent
Data processed	App code submitted for automated review; Customer personal data only where incidentally included by Customer and necessary for the authorised review
Status / notes	Current; configured to prohibit provider training on submitted Customer Data and to apply limited retention; where such prohibition is not contractually available, Completa will not submit Customer personal data to the provider until the prohibition is secured

Register administration

Completa will maintain each provider's legal contracting identity, relevant service, actual processing locations, international transfer safeguards, subprocessor role and material onward processors. The current register, including processing locations and applicable transfer safeguards for each provider, will be made available through the services or at a URL notified to Customer, and changes will be notified in accordance with the 15-day notice period in Section 5. A provider that does not process Customer personal data on Completa's behalf is not a subprocessor and may be identified separately for transparency.

Payment service provider (planned; not a subprocessor)

Stripe — planned provider for online subscription payments. Purpose: card and payment processing, payment status, refunds, fraud controls and reconciliation. Data: billing contact details, transaction details and payment information submitted through Stripe. Status: planned. Stripe may act as an independent controller or processor depending on the activity and applicable terms; it is not a subprocessor for Customer application data unless and to the extent it processes that data on Completa's documented instructions. Completa may alternatively invoice customers or partners directly and receive payment by bank transfer. Stripe will be added to this register and notified under Section 5 if it comes to process Customer personal data on Completa's behalf.