Sub-processors

KYCJet — list pursuant to Article 28(2) and (4) GDPR. Version of 21 September 2026.

To verify the identity of persons on behalf of our customers, GREM S.R.L. uses the providers below. The customer, as controller, authorises them by signing the data processing agreement. Any addition or replacement is notified in writing at least 30 days before it takes effect, and the customer may object.

Provider	Function	Data received	Location	Transfer safeguards
Hetzner Online GmbH	Application servers and database	All case data except photographs	Germany	No transfer outside the EU
Amazon Web Services EMEA SARL	Photograph storage (S3); document text extraction (Textract); face comparison and liveness check (Rekognition)	Document photographs, chip portrait, liveness frame, extracted text	Ireland (eu-west-1 region)	No processing outside the EU; use of content to improve AWS services disabled (organisation-level opt-out)
Dilisense	Screening against sanctions, politically exposed persons and criminal watchlists	First name and surname only	Switzerland	European Commission adequacy decision

Other providers, which receive no data about verified persons

They process data for which GREM S.R.L. is controller (the customer's account and billing), described in the Privacy Notice:

Provider	Function	Location
Cloudflare, Inc.	Service emails to the customer's members (name and email) and system alerts, without personal data	United States — EU-US Data Privacy Framework
Stripe Payments Europe Ltd.	Collection of the customer's payments	Ireland

What nobody receives

- No provider receives data to train models.
- No data about verified persons leaves the European Union, except the first name and surname sent to Dilisense in Switzerland, a country with an adequacy decision.
- The automated notifications we send to the customer's systems (webhooks) contain no data about verified persons: only the case identifier, status, time and the reference the customer itself assigned to the case.

For the customer

This list is what you need to complete your notice to data subjects (Article 13(1)(e) and (f)) and your record of processing activities (Article 30). For DORA, the register of information data sheet lists the same providers with the required fields.