

# Sub-Processor List

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## About This Document

LexAI Technologies, s.r.o. (hereinafter "LexAI") publishes this current list of sub-processors — third parties that process personal data of users in the course of providing the LexAI platform — in accordance with Art. 28(2) GDPR and the commitments made in the Privacy Policy and Data Processing Agreement (DPA).

**Change notification:** We will notify you by email at least 30 days in advance of engaging a new sub-processor or making a material change to an existing one. Controllers (enterprise customers) with a DPA in place with LexAI have the right to raise a reasoned objection within 14 days of notification.

## Current Sub-Processor List

### Core Infrastructure and Data Processing

Sub-Processor	Jurisdiction	Data Location	Purpose	Data Processed	Transfer Mechanism
<b>Anthropic, PBC</b>	USA	USA	AI query processing (Claude API)	Conversation content, documents submitted for analysis	Standard Contractual Clauses (SCCs) under Art. 46 GDPR
<b>Supabase, Inc.</b>	USA	EU – Frankfurt	Database and user authentication	All user data (stored in encrypted form only)	Standard Contractual Clauses (SCCs)
<b>Vercel, Inc.</b>	USA	USA / EU	Serverless hosting and edge functions	Request logs, API calls	Standard Contractual Clauses (SCCs)
<b>Hetzner Online GmbH</b>	Germany (EU)	EU – Frankfurt	Proprietary servers (vector database, security logs, document processing)	Security logs, document processing for export/import	Within EEA — SCCs not required
<b>Qdrant</b>	EU	EU – Frankfurt (self-hosted on Hetzner)	Vector database for public legal sources	Embeddings of public legal sources — <b>no user data</b>	Within EEA — SCCs not required

## Payments and Billing

Sub-Processor	Jurisdiction	Data Location	Purpose	Data Processed	Transfer Mechanism
<b>Stripe, Inc.</b>	USA	USA (EU compliance)	Payment gateway, subscription management	Payment details, billing information, subscription ID	Standard Contractual Clauses (SCCs); EU–U.S. Data Privacy Framework

## Communications

Sub-Processor	Jurisdiction	Data Location	Purpose	Data Processed	Transfer Mechanism
<b>Twilio SendGrid</b>	USA	USA	Transactional email communication (notifications, account verification)	Email addresses, content of notification emails	Standard Contractual Clauses (SCCs)

## Search and Auxiliary Services

Sub-Processor	Jurisdiction	Data Location	Purpose	Data Processed	Transfer Mechanism
<b>SerpAPI</b>	USA	USA	Web search within legal research	Search queries (without personal user identifiers)	Standard Contractual Clauses (SCCs)
<b>Brave Search</b>	USA	USA	Alternative web search	Search queries (without personal user identifiers)	Standard Contractual Clauses (SCCs)
<b>IPIInfo</b>	USA	USA	IP address geolocation for security purposes	User IP addresses	Standard Contractual Clauses (SCCs)

## Transfers of Personal Data Outside the EEA

Some sub-processors are located or process data outside the European Economic Area (EEA), in particular in the USA. All such transfers are safeguarded by one or more of the following mechanisms:

- **Standard Contractual Clauses (SCCs)** adopted by the European Commission under Art. 46(2)(c) GDPR;

- **EU–U.S. Data Privacy Framework (DPF)** — adequacy decision of the European Commission dated 10 July 2023, where applicable.

A copy of the relevant SCCs can be provided upon request to controllers with a DPA in place with LexAI. Requests should be sent to [support@lexaitechnologies.com](mailto:support@lexaitechnologies.com).

## Special Notes

**Anthropic (AI processing):** Conversation and document content is transmitted to Anthropic's AI models via a commercial API. Anthropic does not use data submitted via the API to train its models. Due to LexAI's zero-knowledge architecture, data is encrypted directly on the user's device before being sent to LexAI's servers — it is transmitted to the Anthropic API in decrypted form solely for the duration of query processing.

**Qdrant:** This vector database is operated as a self-hosted instance on Hetzner infrastructure (EU – Frankfurt) and contains exclusively embeddings of publicly available legal sources (Czech case law, legislation, EU sources). No user data is stored here.

**Supabase:** Data is stored exclusively in encrypted form in accordance with LexAI's zero-knowledge architecture. Supabase has no access to unencrypted conversation or document content.

## Changelog

Version	Date	Change
1.0	June 2025	Initial publication

*This document is updated on an ongoing basis. The date of the last update is indicated in the header. Archived versions are available upon request at [support@lexaitechnologies.com](mailto:support@lexaitechnologies.com).*