

## LIST OF SUB-PROCESSORS

### INTRODUCTION

At OutSystems, security, privacy, and regulatory compliance are foundational to how we deliver value to our customers and to how we empower organizations to serve their customers. We are proud to be recognized as a leader in the low-code platform market, a position built on the trust our customers place in us.

To meet the high standards our customers expect from a global technology provider, OutSystems collaborates with carefully selected third-party companies. These partners bring specialized capabilities that enable us to innovate and scale. In certain cases these partners may, when providing services to us, process various categories of data, including Controller's Personal Data, as defined in our Data Processing Agreement (available [here](#)).

When such third parties are engaged to perform services that involve the processing of Controller's Personal Data in connection with our Services (as defined in our Data Processing Agreement and governed by our Master Subscription Agreement, available [here](#)), they are designated as sub-processors, in accordance with the terminology and requirements set forth in the General Data Protection Regulation (GDPR). OutSystems ensures that all sub-processors are engaged pursuant to rigorous due diligence procedures and are bound by robust contractual and security safeguards, as outlined in our Data Processing Agreement.

This document outlines the sub-processors currently engaged by OutSystems, to provide Services to our customers, in accordance with our Data Processing Agreement. Where applicable, we also describe herein the personal data transfer mechanisms implemented to ensure an adequate level of protection when personal data is transferred internationally.

OutSystems maintains an up-to-date list of its sub-processors, which is always available [here](#). This list may evolve over time as our operational and service delivery needs change. In accordance with our Data Processing Agreement, customers will be notified of the appointment of any new sub-processors as determined therein.

Sub-processors relevant to an individual customer will depend on the particular OutSystems Services the customer has subscribed to. Section I. below outlines our sub-processors for ODC & O11. Section II. below applies solely to our O11 FedRAMP offer.

To have more information on the topic, please check our FAQs available [here](#). For any inquiries related to sub-processor engagements or data protection more broadly, customers may contact our Data Privacy Office at [dpo@outsystems.com](mailto:dpo@outsystems.com).

### TYPES OF SUB-PROCESSORS

OutSystems sub-processors include third-parties and OutSystems affiliates. OutSystems has designated the following categories of sub-processors:

- **Infrastructure:** These sub-processors provide us with cloud services and infrastructure;
- **Ancillary:** These sub-processors provide ancillary services to help support, operate, and maintain OutSystems Services; and
- **Support and professional services:** These sub-processors (OutSystems affiliates) provide support and professional services within the context of specific OutSystems Services.

**SECTION I – ODC & O11 general information**

**1. THIRD-PARTY SUB-PROCESSORS**

The tables below include information on our third-party sub-processors belonging to each of the categories mentioned above. The column on Product/Service identifies OutSystems products and/or services for which the services of each sub-processor are used.

**1.1. Infrastructure sub-processors**

Product/Service	Sub-processor name	Sub-processor details	Nature of processing/ service provided	Personal data processed	Data Hosting location	Transfer mechanism	Security measures and additional information
<b>ODC &amp; O11 (cloud)</b>	<b>AWS</b>	Europe: Amazon Web Services EMEA SARL; 38 Avenue John F. Kennedy, L-1855, Luxembourg; US: Amazon Web Services, Inc.; 410 Terry Avenue North, Seattle, WA 98109-5210, U.S.A. (depending on location).	Hosting and cloud infrastructure services, including the provision of AI functionalities activated by the Customer (such as AI Guardrails).	Customer’s application data, (including customer’s application log data and, when AI functionalities are activated by the Customer, personal data included in prompts and outputs).	For application data see the information available <a href="#">here</a> (section provisioning) for O11 and <a href="#">here</a> (section Infrastructure geography) for ODC. For application log data see the information available <a href="#">here</a> .	Normally not applicable, but this depends on the region chosen by the customer. Where applicable: adequacy decision (EU-U.S. Data Privacy Framework, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework).	The relevant security measures can be found in annex 1 available <a href="#">here</a> . Information on AWS’ sub-processors can be found <a href="#">here</a> .

**1.2. Ancillary sub-processors**

Product/Service	Sub-processor name	Sub-processor details	Nature of processing/ service provided	Personal data processed	Data Hosting location	Transfer mechanism	Security measures and additional information
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<b>ODC &amp; O11 (cloud and self-managed)</b>	<b>Zendesk</b>	Zendesk, Inc. 181 Fremont St 17th Floor San Francisco, CA 94105 USA	Management of support tickets - Helpdesk software for customer support	Zendesk will only act as a sub-processor insofar as the customer includes personal data that OutSystems processes on its behalf in the tickets sent to OutSystems. The customer therefore controls what personal data will be processed by Zendesk as a sub-processor.	Ireland	Adequacy decision (EU-U.S. Data Privacy Framework, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework).	The relevant security measures can be found in annex 2 available <a href="#">here</a> and <a href="#">here</a> . Information on Zendesk's sub-processors can be found <a href="#">here</a> .
	<b>Atlassian</b>	Atlassian Pty Ltd Level 6, 341 George Street Sydney NSW 2000 Australia	Atlassian provides Jira, a project management and issue-tracking software, and Adaptavist provides an add-on for Jira. These are used by OutSystems for the management of support tickets escalated to engineering teams and for the management of end-to-end professional services, when customers do not have their own project management tool.	Atlassian and Adaptavist will only act as sub-processors in limited situations: (1) Where the customer requests the provision of end-to-end professional services by OutSystems, does not have its own project management tool and decides to share certain personal data that OutSystems processes on the customer's behalf within this context; (2) Where the customer includes personal data that OutSystems processes on its behalf in the tickets sent to OutSystems and this ticket must be escalated to one of OutSystems engineering teams to solve the issue reported.  In both cases, the customer controls what personal data will be processed by Atlassian and Adaptavist as sub-processors.	Germany	Standard contractual clauses	The relevant security measures can be found in <a href="#">here</a> . Information on Atlassian's sub-processors can be found <a href="#">here</a> .
	<b>Adaptavist</b>	Adaptavist UK Services Ltd, Adaptavist, 25 Wilton Road, Victoria, London, United Kingdom SW1V 1LW				Germany	UK adequacy decision issued by the European Commission.

<b>ODC &amp; O11 (cloud)</b>	<b>Rootly</b>	Rootly Inc 1390 Market Street, Unit 2126 San Francisco, CA 94102	Management of support tickets - Engineering software for customer support	Rootly will only act as a sub-processor in very limited situations in which (i) the customer includes personal data that OutSystems processes on its behalf in the tickets sent to OutSystems and (ii) this ticket has to be escalated to the SRE (engineering) team. The customer therefore controls what personal data will be processed by Rootly as a sub-processor.	USA	Standard contractual clauses	All data is encrypted at rest using AES-256 and in transit using TLS 1.3. Rootly enforces strict tenant-level data isolation and access controls. More details can be found <a href="#">here</a> .
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## II. OUTSYSTEMS GROUP SUB-PROCESSORS (SUPPORT AND PROFESSIONAL SERVICES)

OutSystems Group companies below may also act as sub-processors to the extent that these OutSystems Group companies process Controller's Personal Data when providing (1) technical and operational support to customers for all products (ODC and O11, including services on-premises) or (2) professional services requested by customers. The exact teams/subsidiaries to be involved vary depending on the services to be provided.

Affiliate details (name)	Affiliate details (registered address)	Nature of processing/ service provided	Personal data processed	Processing location	Transfer mechanism	Security measures and additional information
OutSystems - Software em Rede S.A.	Rua Central Park, Ed. 2 - 2 A, 2795-242 Linda-a-Velha, Portugal	(1) technical and operational support to customers for all products (ODC and O11, including services on-premises) and/or (2) professional services requested by customers	OutSystems affiliates will only act as sub-processors in limited situations: (1) Where the customer requests the provision of end-to-end professional services by OutSystems; (2) Where the customer includes personal data that OutSystems processes on its behalf in the tickets sent to OutSystems.	Portugal	Not applicable.	More details can be found <a href="#">here</a> .
OutSystems, Inc.	800 Delaware Avenue, Wilmington, DE 19801, U.S.A.			USA	Standard contractual clauses.	
OutSystems Limited	3 Warners Mill, Silks Way, Braintree, Essex CM7 3GB, United Kingdom			United Kingdom	Adequacy decision.	
OutSystems Benelux B.V.	Groenewoudsedijk 61, 3528 BG, Utrecht, Netherlands			Netherlands	Not applicable.	
OutSystems Singapore Pte. Ltd.	8 Temasek Boulevard #09-04/05 Suntec Three Singapore 038988, Singapore			Singapore	Standard contractual clauses.	
OutSystems Software LLC	PO Box: 336353, Dubai Marina, Dubai, UAE			UAE	Standard contractual clauses.	

OutSystems Japan KK	Ark Hills South Tower 9th floor, 1-4-5 Roppongi, Minato-ku, Tokyo 106-0032, Japan		In both cases, the customer controls what personal data will be processed by OutSystems affiliates as sub-processors.	Japan	Adequacy decision.
OutSystems Germany GmbH	Spaces Tower One, Bruesseler Strasse 1-3, 60327 Frankfurt, Germany			Germany	Not applicable.
OutSystems Software Pty Ltd	Piper Alderman, Governor Macquarie Tower, Level 23, 1 Farrer Place, Sydney NSW 2000, Australia			Australia	Standard contractual clauses.
OutSystems Malaysia Sdn. Bhd.	Unit 27-07, Level 27, Q Sentral, 2A, Jalan Stesen Sentral 2, Kuala Lumpur Sentral, 50470 Kuala Lumpur, Malaysia			Malaysia	Standard contractual clauses.
OutSystems Philippines Inc.	21st Floor, LKG Tower, 6801 Ayala Avenue, Bel-Air, 1226 Makati City, Philippines			Philippines	Standard contractual clauses.
OutSystems Brasil Ltda.	Rua dos Pinheiros, N° 870, 22nd Floor, Cj. 221, Pinheiros, São Paulo, CEP 05422-001, Brazil			Brazil	Adequacy decision.
OutSystems India Private Limited	WeWork Galaxy, 43, Office 05A119, Residency Rd, Shanthala Nagar, Ashok Nagar, Bengaluru, Karnataka 560025			India	Standard contractual clauses.
OutSystems Korea, Ltd.	Yeouido 1st. 7F Gukjegeumyung-ro 2-gil, Yeongdeungpo-gu, Seoul, Republic of Korea			Republic of Korea	Adequacy decision.
OutSystems Spain, S.L.U.	Avenida Doctor Arce, number 14, 28002 Madrid, Spain			Spain	Not applicable.

**LAST UPDATED ON:** 7 November 2025.

## SECTION II –O11 FedRAMP

### 1. THIRD-PARTY SUB-PROCESSORS

The tables below include information on our third-party sub-processors belonging to each of the categories mentioned above.

#### 1.1. Infrastructure sub-processors

Sub-processor name	Sub-processor details	Nature of processing/ service provided	Personal data processed	Data Hosting location	Transfer mechanism	Security measures and additional information
<b>Knox</b>	Knox Systems, Inc. 1606 Headway Cir STE 9793 Austin, TX 78754 U.S.A.	Hosting and cloud Infrastructure services. Support services (Level 1 support).	Customer’s application data, (including customer’s application log data).	United States	Not applicable for the FedRAMP service offering.	Knox is FedRAMP certified. More information on this certification, as well as implemented security measures and sub-processors can be found <a href="#">here</a> .

#### 1.2. Ancillary sub-processors

Not applicable.

### 2. OUTSYSTEMS GROUP SUB-PROCESSORS (SUPPORT SERVICES)

OutSystems Group companies below may also act as sub-processors to the extent that these OutSystems Group companies process Controller’s Personal Data when providing technical and operational support.

Affiliate details (name)	Affiliate details (registered address)	Nature of processing/ service provided	Personal data processed	Processing location	Transfer mechanism	Security measures and additional information
OutSystems - Software em Rede S.A.	Rua Central Park, Ed. 2 - 2 A, 2795-242 Linda-a-Velha, Portugal	Technical and operational support.	OutSystems affiliates will only act as sub-processors in limited situations where personal data that OutSystems processes on behalf of	Portugal	Not applicable for the FedRAMP service offering.	More details can be found <a href="#">here</a> .
OutSystems Limited	3 Warners Mill, Silks Way, Braintree, Essex CM7 3GB, United Kingdom			United Kingdom		

OutSystems Benelux B.V.	Groenewoudsedijk 61, 3528 BG, Utrecht, Netherlands	customers must be processed to solve a ticket.	Netherlands
OutSystems Singapore Pte. Ltd.	8 Temasek Boulevard #09-04/05 Suntec Three Singapore 038988, Singapore		Singapore
OutSystems Software LLC	PO Box: 336353, Dubai Marina, Dubai, UAE		UAE
OutSystems Japan KK	Ark Hills South Tower 9th floor, 1-4-5 Roppongi, Minato-ku, Tokyo 106-0032, Japan		Japan
OutSystems Germany GmbH	Spaces Tower One, Bruesseler Strasse 1-3, 60327 Frankfurt, Germany		Germany
OutSystems Software Pty Ltd	Piper Alderman, Governor Macquarie Tower, Level 23, 1 Farrer Place, Sydney NSW 2000, Australia		Australia
OutSystems Malaysia Sdn. Bhd.	Unit 27-07, Level 27, Q Sentral, 2A, Jalan Stesen Sentral 2, Kuala Lumpur Sentral, 50470 Kuala Lumpur, Malaysia		Malaysia
OutSystems Philippines Inc.	21st Floor, LKG Tower, 6801 Ayala Avenue, Bel-Air, 1226 Makati City, Philippines		Philippines
OutSystems Brasil Ltda.	Rua dos Pinheiros, N° 870, 22nd Floor, Cj. 221, Pinheiros, São Paulo, CEP 05422-001, Brazil		Brazil
Outsystems India Private Limited	WeWork Galaxy, 43, Office 05A119, Residency Rd, Shanthala Nagar, Ashok Nagar, Bengaluru, Karnataka 560025		India
OutSystems Korea, Ltd.	Yeouido 1st. 7F Gukjegeumyung-ro 2-gil, Yeongdeungpo-gu, Seoul, Republic of Korea		Republic of Korea
OutSystems Spain, S.L.U.	Avenida Doctor Arce, number 14, 28002 Madrid, Spain		Spain

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