

Howwe sub-processors

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Howwe Technologies AB (publ) (org. no. 556655-7509) uses the sub-processors below to provide the Howwe service. Each one processes customer personal data only on our instructions and under a written data processing agreement. This list covers the Howwe service hosted in the EU. Customers on a separately hosted deployment receive their own list.

Sub-processors that process customer data

Sub-processor	Purpose	Personal data	Location	Transfer safeguard
Google Cloud EMEA Ltd (Google Cloud Platform)	Hosting of the Howwe application and data	All customer data in the service	EU (Netherlands)	Not applicable, EU
ArangoDB GmbH (ArangoGraph)	Managed database for customer and user data	All customer data in the service	EU (Netherlands)	Not applicable, EU
Okta, Inc. (Auth0)	Login, single sign-on and identity	Name, email, IP address, login events	EU	Data hosted in the EU. Access from outside the EU under Standard Contractual Clauses and the EU-U.S. Data Privacy Framework
Google Cloud EMEA Ltd (Gemini on Vertex AI)	Howwe's AI features, such as Strategy Planner, Strategic Pulse and Intelligence Hub	Strategy content a user sends to an AI feature	EU	Not applicable, EU
Cloudflare, Inc.	Encryption, protection against attacks and delivery of traffic to the Howwe service	IP address and data in transit	Global network	EU-U.S. Data Privacy Framework and Standard Contractual Clauses
Intercom R&D Unlimited Company	In-app support chat, help center and support AI agent (Fin), including the AI providers Intercom uses for Fin in the EU	Name, email, support conversations	EU (Ireland)	Not applicable, EU
PostHog, Inc.	Product analytics, error tracking, session recordings with all text masked, and AI assistant (MCP) usage logs	User ID, organisation ID, usage and error events	EU (Germany)	Data hosted in the EU. Access from outside the EU under Standard Contractual Clauses and the EU-U.S. Data Privacy Framework
Twilio Inc. (SendGrid)	Notification and account emails	Name, email, notification content	USA	EU-U.S. Data Privacy Framework and Standard Contractual Clauses

All customer data in the service is stored in the EU. Twilio SendGrid processes notification emails in the USA, and Cloudflare carries traffic through its global network.

AI assistants you connect yourself

When a user connects an AI assistant, such as Microsoft Copilot, Claude, ChatGPT or Gemini, to Howwe through our [MCP server](#), the assistant's provider is not a Howwe sub-processor. The customer or user chooses that provider, and the provider processes Howwe data under its own agreement with the customer or user. See our [Privacy Policy](#).

Changes to this list

We notify customers at least 30 days before we add or replace a sub-processor that processes customer data, by email to the customer's contact person or in the service. A customer may object on reasonable data protection grounds within that period, as described in the [Data Processing Agreement](#). To be told about changes, email contact@howwe.io.