



Smartvatten Sub-Processors

Last updated: 05/10/2026

Introduction

Smartvatten uses carefully selected sub-processors to support the delivery, operation, maintenance, and development of its services. Where a sub-processor processes personal data on Smartvatten's behalf, such processing is governed by contractual safeguards and carried out only according to Smartvatten's documented instructions.

The table below identifies the current sub-processors used in Smartvatten services, the purpose of processing, and the applicable transfer mechanism where personal data may be processed outside the European Union (EU) or European Economic Area (EEA).

Current Sub-Processors

Sub-processor	Country	Purpose	Service(s)	Transfer Basis (if outside EU/EEA)
AWS	Ireland	Cloud infrastructure and hosting	NODE OMNI	N/A
BulkSMS	South Africa	SMS delivery and notifications	NODE VERTO	SCCs
Clearblade	USA	IoT platform, data transfer and database services	NODE VERTO	SCCs
Effectio Oy	Finland	Support, maintenance and training services	NODE OMNI	N/A
Google Cloud	Ireland / USA / Belgium	Cloud infrastructure and hosting	PRIME, NODE VERTO, NODE OMNI	Adequacy Decision
Mailgun	USA	Email delivery and notifications	NODE OMNI	SCCs
Mandrill (Intuit Mailchimp)	USA	Email delivery and notifications	PRIME, NODE VERTO	SCCs
MongoDB Atlas	Ireland / USA / Belgium	Database platform and data storage	PRIME, NODE VERTO, NODE OMNI	Adequacy Decision
Netland Oy	Finland	Technical provision of the e-mail service.	NODE VERTO	N/A
Nokeval Oy	Finland	Support, maintenance and training services	NODE VERTO	N/A
Planea Oy	Finland	Support, maintenance and training services	NODE VERTO	N/A



Sub-processor	Country	Purpose	Service(s)	Transfer Basis (if outside EU/EEA)
Quriiri (NextUp Oy)	Finland	SMS delivery and notifications	PRIME, NODE VERTO	N/A
Ukkonen Electric Oy	Finland	Support, maintenance and training services	NODE VERTO	N/A

International Data Transfer Mechanisms

Where personal data is transferred outside the EU/EEA, Smartvatten ensures that appropriate safeguards are in place in accordance with applicable data protection legislation.

Transfer Basis	Description
N/A	Personal data is processed within the EU/EEA
SCCs	Personal data transfers are protected by the European Commission's Standard Contractual Clauses and supplementary measures where required.
Adequacy Decision	Personal data is transferred to a country recognized by the European Commission as providing an adequate level of data protection.

Changes to Sub-Processors

Smartvatten may update its list of sub-processors from time to time as services evolve. Material changes to sub-processors will be managed in accordance with applicable contractual commitments and data processing agreements.