

## Liste der Unterauftragsverarbeiter (Update: März 2026)

Die nachfolgend aufgeführten Unternehmen werden von der Fotografen Online Service GmbH (GotPhoto) als Unterauftragsverarbeiter eingesetzt, um die vertraglich vereinbarten Leistungen gegenüber unseren Kunden zu erbringen.

Die Beauftragung erfolgt ausschließlich im Rahmen der Auftragsverarbeitung gemäß der zwischen GotPhoto und dem jeweiligen Fotografen geschlossenen Vereinbarung zur Auftragsverarbeitung (AVV).

Die Liste umfasst diejenigen Dienstleister, die personenbezogene Daten im Auftrag unserer Kunden verarbeiten (z. B. Hosting, IT-Infrastruktur, E-Mail-Versand, Zahlungsabwicklung oder Support-Tools).

Diese Übersicht ist Bestandteil der AVV-Anlagen und wird aktualisiert, um den jeweils aktuellen Stand der eingesetzten Unterauftragsverarbeiter abzubilden.

Soweit Unterauftragsverarbeiter ihren Sitz außerhalb der EU oder des EWR haben, erfolgt eine Datenübermittlung ausschließlich unter Einhaltung der Voraussetzungen der Art. 44 ff. DSGVO.

| Markets | Tool / System | Name of Sub-processor and Address                                                                             | Service provided                          | Purpose of processing                                                                                                                                   | Data Processed                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Location of Processing                                       | Transfer Mechanism                                                                                                                                                                                                             |
|---------|---------------|---------------------------------------------------------------------------------------------------------------|-------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| All     | AWS           | Amazon Web Services EMEA Sarl, 38 John F. Kennedy, L-1855, Luxemburg                                          | Cloud Infrastructure and Hosting Services | Provision of cloud infrastructure and hosting services, including data storage, content delivery network (CDN) services, and related technical support. | 1) End customer details: Email address, phone number (if applies), first name, last name,<br>2) Subject details (if applies): First name, last name, group/grade, teacher, gender, birthdate, organization, address, photos<br>3) Order details: Billing address, purchased products and photos, order amount, order date, delivery address (if applies)<br>4) Technical data: IP Address, User-Agent / Browser Information, Operating System, Referrer URL, Cookies, Timestamp, Session ID<br>5) Data analytics: location (based on IP address), device/browser information, where did they come from (referral), user behavior and events (clicks, scrolls, session recordings, task completion, etc) | AWS servers based in the European Union (Frankfurt, Germany) | Intra-group transfers within AWS group covered by EU Standard Contractual Clauses; AWS Inc. certified under the EU-US Data Privacy Framework, UK Extension and Swiss-US Data Privacy Framework (where applicable).             |
| All     | Snowflake     | Snowflake Computing Netherlands B.V., FOZ Building, Gustav Mahlerlaan 300-314, 1082 ME Amsterdam, Netherlands | Data Warehouse                            | secure and encrypted data storage and analysis                                                                                                          | all                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | AWS servers based in the European Union (Frankfurt, Germany) | Intra-group transfers within Snowflake group covered by EU Standard Contractual Clauses; Snowflake Inc. certified under the EU-US Data Privacy Framework, UK Extension and Swiss-US Data Privacy Framework (where applicable). |
| All     | Airbyte       | Airbyte, Inc., 2261 Market Street, Suite 4381, San Francisco, CA 94114, United States                         | Data Integration Engine                   | consolidation of data in databases and warehouses                                                                                                       | all                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Servers based in the European Union (Frankfurt, Germany)     | Transfers are covered by EU Standard Contractual Clauses                                                                                                                                                                       |
| All     | Sentry        | Functional Software, Inc., 45 Fremont Street, 8th Floor San Francisco, CA 94105, United States                | Error Monitoring and Debugging            | Monitor application errors and exceptions in real-time to identify, diagnose, and resolve issues quickly, ensuring application reliability.             | Technical data related to application errors and crashes, including error messages, stack traces, and device/browser information. Personal data is minimized but may be captured incidentally.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Servers based in the United States                           | Sentry.io certified under the EU-US Data Privacy Framework, UK Extension and Swiss-US Data Privacy Framework; in case of invalidation international transfers are covered by EU Standard Contractual Clauses.                  |

| Markets     | Tool / System   | Name of Sub-processor and Address                                                   | Service provided                                      | Purpose of processing                                                                                                                                                                                                                                                                               | Data Processed                                                                                                                                                                                                                                                                                                                                           | Location of Processing                                       | Transfer Mechanism                                                                                                                                                                                                 |
|-------------|-----------------|-------------------------------------------------------------------------------------|-------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| All         | Uptrace         | Uptrace, Chisinau, Moldova                                                          | Application Performance and Infrastructure Monitoring | 1) Monitor and analyze application performance, infrastructure health, and system metrics to ensure optimal functioning and reliability of the services.<br><br>2) Sort logs to determine and solve issues with photo uploads, when receiving a bug report or other issue report from photographer. | 1) Application logs, server logs, performance metrics, including response times, server load, network performance, and other technical data related to application health. Personal data is minimized but may be captured incidentally.<br><br>2) PID (photographer ID), Job ID, Album ID, Photo ID, photo name, photo extension, photo size, OS version | Servers based in Germany (backups in Finland)                |                                                                                                                                                                                                                    |
| All         | PostHog         | PostHog, Inc., 2261 Market Street #4008, San Francisco, CA 94114, United States     | Analytics                                             | Track user behavior and interactions on the website or application to improve product performance, troubleshoot issues, and optimize user experience.                                                                                                                                               | Anonymized behavioral data such as clicks, page views, session duration, and interaction events. No personally identifiable information (PII) is collected.<br><br>Tracks anonymized user events for product insights.                                                                                                                                   |                                                              | Transfers are covered by EU Standard Contractual Clauses; PostHog, Inc. certified under the EU-US Data Privacy Framework, UK Extension and Swiss-US Data Privacy Framework                                         |
| All         | AWS             | Amazon Web Services EMEA Sarl, 38 John F. Kennedy, L-1855, Luxembourg               | Communication (Email notifications)                   | Notify customers (parents) about picture day events, order confirmations, or upcoming buying opportunities                                                                                                                                                                                          | Customer contact information (e.g., email addresses, phone numbers) and relevant message content (e.g., event reminders, order confirmations)                                                                                                                                                                                                            | AWS servers based in the European Union (Frankfurt, Germany) | Intra-group transfers within AWS group covered by EU Standard Contractual Clauses; AWS Inc. certified under the EU-US Data Privacy Framework, UK Extension and Swiss-US Data Privacy Framework (where applicable). |
| All         | ProImageExperts | ProImageExperts LLC., 30405 Solon Road, Suite 9, Cleveland, OH 44139, United States | Image editing                                         | Manual editing, cropping, culling                                                                                                                                                                                                                                                                   | Photographic images and associated metadata, such as image details, provided by the photographer for editing, photographer name, file name, and album name.                                                                                                                                                                                              | United States (sub-processors in India)                      | Transfers are covered by EU Standard Contractual Clauses                                                                                                                                                           |
| All         | 36Pix           | 36Pix Inc., 9350 Avenue de l'Esplanade, Montréal, QC H2N 1C8, Canada                | Image editing                                         | Background removal                                                                                                                                                                                                                                                                                  | Photographic images and associated metadata, such as image details, provided by the photographer for editing, photographer name, file name, and album name.                                                                                                                                                                                              | Canada (sub-processors in the United States)                 | Transfers are covered by EU Standard Contractual Clauses                                                                                                                                                           |
| All         | Pure Photos     | TeamDev Management OÜ, Narva mnt 7-559, 10117, Kesklinna linnaosa, Tallin, Estonia  | Image editing                                         | Background removal                                                                                                                                                                                                                                                                                  | Photographic images and associated metadata, such as image details, provided by the photographer for editing, photographer name, file name, and album name.                                                                                                                                                                                              | Estonia                                                      | Transfers are covered by EU Standard Contractual Clauses                                                                                                                                                           |
| All         | Photo Room      | Photo Room S.A.S., 229 rue Saint-Honoré, 75001 Paris, France                        | Image editing                                         | Modification and editing of photos with the use of artificial intelligence                                                                                                                                                                                                                          | Photographic images and associated metadata, Subject (first name, last name, teacher, group, identifier), Customer (customer name, email, phone number), Job (job name, institution)                                                                                                                                                                     | France                                                       | Transfers are covered by EU Standard Contractual Clauses                                                                                                                                                           |
| Europe only | Photo Labs      | various                                                                             | Photo Lab                                             | Provision of tangible photo products, order processing and delivery (e.g., batch delivery to the photographer's studio).                                                                                                                                                                            | Customer order information, including images and order details, along with the photographer's contact information. This data is shared with the lab for fulfillment and delivery purposes.                                                                                                                                                               |                                                              |                                                                                                                                                                                                                    |
| Germany     |                 | allcop Farbbild-Service GmbH & Co. KG, Kreuzhofstraße 5, 88161 Lindenberg, Germany  | Photo Lab                                             |                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                          | Germany                                                      |                                                                                                                                                                                                                    |

| Markets     | Tool / System | Name of Sub-processor and Address                                                          | Service provided | Purpose of processing | Data Processed | Location of Processing | Transfer Mechanism |
|-------------|---------------|--------------------------------------------------------------------------------------------|------------------|-----------------------|----------------|------------------------|--------------------|
|             |               | DPL Foto GmbH, Im Klei 9, 38644 Goslar-Jerstedt, Germany                                   | Photo Lab        |                       |                | Germany                |                    |
|             |               | FUJIFILM IMAGING PRODUCTS & SOLUTIONS GmbH & Co. KG, Siemensring 1, 47877 Willich, Germany | Photo Lab        |                       |                | Netherlands            |                    |
|             |               | Picture Digital, Schillerstrasse 40, 10627 Berlin, Germany                                 | Photo Lab        |                       |                | Germany                |                    |
|             |               | Thiele Foto-Laborbetriebe GmbH, Paul-Rücker-Strasse 20, 47059 Duisburg, Germany            | Photo Lab        |                       |                | Germany                |                    |
| Austria     |               | allcop Farbbild-Service GmbH & Co. KG, Kreuzhofstraße 5, 88161 Lindenberg, Germany         | Photo Lab        |                       |                | Germany                |                    |
|             |               | Color Drack GmbH & Co KG, Max-Bader-Platz 4, 5620 Schwarzach im Pongau, Austria            | Photo Lab        |                       |                | Germany                |                    |
| Switzerland |               | Color Drack Schweiz, Untere Weidstrasse 26, 8820 Wädenswil, Switzerland                    | Photo Lab        |                       |                | Germany                |                    |