Vendor and Subprocessor Transparency Statement

Version: 1.0
Last Updated: October 2025
Approved By: Data Protection Officer (DPO)**

1. Purpose

Orbitel.ai believes in full transparency regarding the third-party vendors and subprocessors that support its operations.
This statement outlines Orbitel's vendor due diligence process, subprocessor categories, and data protection expectations.

2. Vendor Classification

Orbitel categorizes vendors and subprocessors into the following groups:

1. **Infrastructure Providers** – Cloud hosting, compute, storage, and network services.

2. **Communication and Productivity Tools** – Email, CRM, chat, and customer support platforms.

3. **Analytics and Monitoring Services** – Tools used for performance optimization and incident detection.

4. **Compliance and Security Vendors** – Providers of vulnerability scanning, audit, and compliance automation tools.

3. Due Diligence and Contractual Controls

Before onboarding any vendor or subprocessor, Orbitel conducts a detailed assessment that includes:

- Review of **ISO 27001, SOC 2, or equivalent certifications.**

- Evaluation of data protection policies and regulatory compliance (GDPR, DPDP, etc.).

- Contractual clauses mandating:

    - Confidentiality and restricted data access.

    - Encryption and security controls.

    - Timely breach reporting and cooperation in investigations.

    - Data deletion upon termination.

Vendors failing to meet Orbitel's standards are not approved.

4. Subprocessor List (as of October 2025)

Orbitel maintains a regularly updated list of subprocessors engaged for specific purposes:

Vendor	Purpose	Data Location	Certifications
Amazon Web Services (AWS)	Cloud hosting and infrastructure	India / EU	ISO 27001, SOC 2
Google Cloud Platform (GCP)	Cloud compute and analytics	Global	ISO 27001, SOC 2
SendGrid	Transactional email delivery	US / EU	SOC 2
HubSpot	CRM and marketing automation	US / EU	ISO 27001, SOC 2
Cloudflare	CDN, DDoS protection, and security	Global	ISO 27001, SOC 2
Atlassian (Jira, Confluence)	Issue tracking and documentation	EU / US	ISO 27001, SOC 2
Notion	Collaboration and knowledge management	US / EU	SOC 2
Zoho	Invoicing and account management	India	ISO 27001

(Note: This list is illustrative; Orbitel will maintain an up-to-date list at orbitel.ai/subprocessors)

5. Change Notification

Orbitel will notify customers at least **30 days in advance** of any addition or replacement of subprocessors.
Customers may object to a new subprocessor if they have legitimate data protection concerns.

6. Data Security and Monitoring

- All subprocessors operate under written data processing agreements with Orbitel.

- Access is strictly limited to data necessary to provide the contracted service.

- Regular audits and reviews verify continued compliance.

7. Data Transfer Safeguards

- Subprocessors outside India or the EU use **Standard Contractual Clauses (SCCs)** or equivalent safeguards.

- Orbitel ensures encryption and security monitoring for all cross-border data flows.

8. Contact and Updates

Orbitel maintains transparency through a dedicated Trust Center section listing current subprocessors and their purposes.

For vendor-related questions, contact:
✉ **privacy@orbitel.ai**
🌐 www.orbitel.ai/trust-center

9. Review and Oversight

This statement is reviewed every six months or whenever a vendor is added, replaced, or removed.
Orbitel's DPO and Legal Team maintain oversight of all subprocessor engagements to ensure ongoing compliance.