Last updated: 06/25/2026

Contract appointing the external Data Processor for the processing of personal data

AI KOSMO SRL

Sub-processors

The Processor is authorized to subcontract part of the processing operations to the following Sub-processors. The following table lists the Sub-processors engaged by the Processor.

Services not provided by the Processor and subject to separate agreements between the Sub-processor and the Controller are excluded. The Sub-processor table will be updated from time to time, and the Controller will be notified accordingly so that it may object to the use of new Sub-processors.

Sub-processors	Sub-processor	Address	Place of processing
Application server / hosting (cloud infrastructure)	Google Cloud	Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, D04 E5W5, Irlanda	EEA (Netherlands)
Database service (DB)	Supabase	Supabase, Inc., 65 Chulia Street #38-02/03, OCBC Centre, Singapore 049513	EEA (Germany)
Hosting e deployment	Vercel	Vercel Inc., 340 S Lemon Ave #4133, Walnut, California 91789, USA	USA / SEE
Hosting e deployment	Railway	Railway Corp., 548 Market St PMB 68956, San Francisco, California 94104, USA	USA / SEE
AI services	OpenAI	OpenAI, L.L.C., 3180 18th Street, San Francisco, California 94110, USA	USA / SEE
AI services	Groq	Groq, Inc., 2700 Zanker Road, Suite 150, San Jose, California 95134, USA	USA

Hosting	OpenRouter	OpenRouter, Inc., 169 Madison Ave #2404, New York, NY 10016, USA	USA / SEE
Monitoring	Axiom	Axiom, Inc., 1390 Market Street, Suite 200, San Francisco, California 94102, USA	USA / SEE
Email and accounts	Google Workspace	Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, D04 E5W5, Irlanda	SEE (UE) / USA

Types / Purposes of processing

Product	Type of processing	Purpose of processing	Type of personal data processed	Category of data subjects
Intelligent Chatbot	• Collection, recording, storage, and consultation of conversations • Analysis of conversation content, aggregated / anonymized where possible • Security and technical maintenance	• Responding to user requests, assisting navigation, and providing information about services • Improving the accuracy / effectiveness of the service, including specific fine-tuning at the Controller's request • Preventing abuse and ensuring operational continuity	• Data actively provided by the user, such as name, surname, contact details, stay preferences • Conversation content • Technical session data, such as IP address, browser, operating system	• Users of the Client's website who use the Intelligent Chatbot

QR Concierge	• Collection, recording, storage, and consultation of conversations • Analysis of conversation content, aggregated / anonymized where possible • Security and technical maintenance	• Responding to user requests, providing information about services, booking services, and managing charges to the room account, where applicable • Improving the accuracy / effectiveness of the service, including specific fine-tuning at the Controller's request • Preventing abuse and ensuring operational continuity	• User identification and contact data • Data actively provided by the user, such as name, surname, contact details, stay preferences • Conversation content • Technical session data, such as IP address, browser, operating system	• Guests who use the QR Digital Concierge