

Sub-processor register

VERSION

1.0

EFFECTIVE

18 October 2026

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This register lists the third parties ("Sub-operators", called sub-processors under the GDPR) that Practor engages to process personal information on a practice's behalf, as clause 8 of the [Data Processing Agreement](#) describes. Every version is kept on this page with its effective date.

Practor hosts the platform and its databases on Amazon Web Services in Ireland. The services Practor runs inside that environment, such as search, the cache and background processing, are not separate Sub-operators. Files uploaded to the platform are stored by Cloudinary, listed below.

Sub-operators

SUB-OPERATOR	WHAT IT DOES FOR PRACTOR	PERSONAL INFORMATION IT PROCESSES	WHERE	TRANSFER SAFEGUARD
Amazon Web Services	Hosting: the application, database, search, background processing, logs and backups	All personal information held in Practor	Ireland (AWS eu-west-1). Requests pass through the Amazon CloudFront edge network	AWS data processing terms. Ireland is subject to the GDPR
Cloudflare	Domain name service, protection against attacks, and encryption of connections to Practor	All information sent to and from Practor, in transit	Global network, nearest location to the user	Cloudflare data processing terms, with the Standard Contractual Clauses
Cloudinary	Storage and delivery of files	Attachments to notes and messages, uploaded documents, recordings of consultations, profile photos and practice logos	United States	Cloudinary data processing terms, with the Standard Contractual Clauses
OpenAI	AI features: drafting clinical notes from consultation transcripts, Ava's chat replies, search over clinical notes, and summarising patient reviews	Consultation transcripts, clinical notes, messages and patient reviews	United States	OpenAI data processing terms, with the Standard Contractual Clauses. Information sent to OpenAI through its API is not used to train its models
Deepgram	Converting speech to text	Recordings of consultations, dictated notes and phone calls handled by Ava	United States	Deepgram data processing terms
LiveKit	Real-time audio for phone calls handled by Ava	Call audio	Global network, nearest location to the caller	LiveKit data processing terms
Modal	Running Ava's phone agent	Call audio, and the patient and appointment details Ava needs to handle a call	United States	Modal data processing terms
ElevenLabs	Turning Ava's replies into speech	The text of Ava's spoken replies, which can include patient and appointment details	United States	ElevenLabs data processing terms
Twilio	SMS, WhatsApp messages, phone numbers and call routing, for appointment reminders, sign-in codes and phone calls handled by Ava. WhatsApp messages are also processed by Meta	Phone numbers, message content and call audio	United States. WhatsApp messages also pass through Meta's global network	Twilio data processing terms, with the Standard Contractual Clauses

Twilio SendGrid	Sending and receiving email: invoices, appointment emails, sign-in links and replies to support requests	Email addresses and email content, including invoice attachments	United States	Twilio data processing terms, with the Standard Contractual Clauses
Google Maps Platform	Address suggestions as an address is typed, and finding a practice's location on a map	Addresses typed into address fields, including patients' addresses	United States	Google data processing terms, with the Standard Contractual Clauses
Fixie	A fixed outbound address for claims sent to the claims network	Claims and eligibility requests, in transit and encrypted end to end, so Fixie cannot read them	Ireland	Fixie data processing terms. Ireland is subject to the GDPR
Pusher	Live updates in the app, such as the calendar, messages and notifications	Notices of changes, which can include patient names and appointment details	European Union	Pusher data processing terms
Sentry	Error monitoring	Details of errors, which can include the request that caused them, and recordings of the screen when an error happens, with all text masked	Germany	Sentry data processing terms
PostHog	Product analytics on how people use the app, only for those who allow analytics cookies	Account identifiers and email addresses of staff, and of patients who use the patient portal, and the pages and features they use. Clinical information is excluded	United States	PostHog data processing terms, with the Standard Contractual Clauses

Not Sub-operators

These receive personal information through Practor but are not Sub-operators, because they do not process it on a practice's behalf:

- **Medical insurers, medical schemes and the claims network.** A claim or eligibility request a practice sends through Practor is disclosed to its recipient on the practice's instruction. The recipient processes it as a responsible party in its own right.
- **PayFast.** Processes the payments a practice makes to Practor for the platform. Practor is the responsible party for that information, as the [Privacy Policy](#) describes.

Changes to the register

Practor gives at least 30 days' notice before it adds or replaces a Sub-operator, by publishing a new version of this register and emailing each practice's owners. The notice states when the change takes effect.

A practice may object to a change on reasonable data protection grounds by emailing privacy@practor.app before it takes effect. Clause 8.4 of the Data Processing Agreement says what happens next.

VERSION	EFFECTIVE	CHANGES
1.0	18 October 2026	First published register.