

HDS Chapter 8 — Subcontractors Table

This table is prepared to align with HDS Chapter 8 requirements and mirrors the actors listed in the DSCP transfer declaration. Values reflect current operating assumptions for HDS patient data (EEA hosting) and standard GDPR safeguards.

Pega Affiliated Subprocessors

Business name of the actor	Role in the hosting service (Host/processor or of the Host)	HDS certified (yes /no/ exempted)	SecNumCloud 3.2 qualified	Hosting activities in which the player is involved	Access to personal health data from countries outside the EEA (Req. 29)	Risk of access imposed by third-country legislation in breach of EU law (Req. 30)	Notes
Pegasystems Inc. (Host)	Host	No	No	Application platform operations; incident response; vendor management	Yes — limited, controlled remote support access from the U.S. when required	Yes — potential access under U.S. law (e.g., FISA §702); mitigated by SCCs/DPF and technical controls	Primary contractual host; production PHI hosted in EEA AWS regions
Pega Japan KK	Processor of the Host	Exempted	No	Technical support & maintenance	Yes — limited remote support access from Japan when needed	Potential — cooperation duties under APPI/government requests; mitigated by SCCs and TOMs	No PHI hosting outside EEA; support-only
Pegasystems New Zealand Limited	Processor of the Host	Exempted	No	Regional support services	Yes — limited remote support access from New Zealand when needed	Potential — disclosure powers under Privacy Act/OIA; mitigated by SCCs and TOMs	Support-only; no PHI hosting
Pegasystems PTY Limited (Australia)	Processor of the Host	Exempted	No	Support & operations	Yes — limited remote support access from Australia when needed	Potential — Telecommunications (Interception and Access) Act; mitigated by SCCs and TOMs	Support-only; no PHI hosting
Pegasystems Worldwide	Processor of the Host	Exempted	No	Development & support	Yes — limited remote access for bug	Potential — DPDPA/IT Act powers; mitigated by SCCs and TOMs	Support-only; no PHI hosting

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India Pvt. Ltd.					fixes/escalations from India		
Pegasystems Software Limited Sp. z o.o. (Poland)	Processor of the Host	Exempted	No	Support & operations within EEA	No — activity remains within the EEA (Poland)	No — within EU jurisdiction (GDPR)	EEA-based operations
Pegasystems Serviços de Software do Brasil Ltda.	Processor of the Host	Exempted	No	Support escalation	Yes — limited remote support access from Brazil when needed	Potential — LGPD/government access; mitigated by SCCs and TOMs	Support-only; no PHI hosting
Pegasystems Limited (United Kingdom)	Processor of the Host	Exempted	No	Regional customer support	Yes — limited remote support access from the UK when needed	Potential — IPA/RIPA powers; mitigated by SCCs and TOMs	Support-only; no PHI hosting

Third-Party Subprocessors

Business name of the actor	Role in the hosting service (Host/processor of the Host)	HDS certified (yes/ no/ exempted)	SecNumCloud 3.2 qualified	Hosting activities in which the player is involved	Access to personal health data from countries outside the EEA (Req. 29)	Risk of access imposed by third-country legislation in breach of EU law (Req. 30)	Notes
Amazon Web Services, Inc.	Host	Yes	No	Cloud infrastructure (IaaS). PHI hosting only in EEA AWS regions	No — French Health Data hosted in EEA regions; support access configured to remain in-region	Yes — U.S. law (FISA §702/NSLs) could apply to the provider; mitigated by encryption/contractual controls	Contractual commitment: HDS patient data hosted only in EEA AWS regions
Cognizant Technology Solutions U.S. Corporation	Processor of the Host	Exempted	No	Customer support services	Yes — limited support access from the U.S.	Yes — U.S. law (FISA §702/NSLs) may compel disclosure; mitigated by SCCs/DPF and TOMs	Support tickets/logs; minimal PHI exposure
Cognizant Technology Solutions	Processor of the Host	Exempted	No	Customer support escalation	Yes — limited support access from India	Potential — Indian law (DPDPA/IT Act); mitigated by SCCs and TOMs	Support escalation; minimal PHI exposure



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India Pvt. Ltd.							
NetApp, Inc. (Instaclustr Pty Ltd., acquired)	Processor of the Host	No	No	Staff augmentation & database services; PHI hosting remains in EEA AWS	No — PHI hosted in EEA regions; remote admin restricted per contract	Yes — U.S. law (FISA §702/NSLs) may apply; mitigated by encryption/contractual controls	Instaclustr services under NetApp; PHI remains in EEA AWS regions