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GRAINE TRUST CENTER · DOCUMENT

Sub-processor List

GR-PUB-05 · Version 1.1

Approved — effective 3 November 2026

DOCUMENT ID	VERSION	CLASSIFICATION
GR-PUB-05	1.1	Public

GRAINE AI · MAVRIX AI PRIVATE LIMITED

Document control

DOCUMENT ID	GR-PUB-05
VERSION	1.1
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APPLIES TO	The Graine AI business platform, and the vendors that process customer personal data on Graine's behalf

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1. What this list is

A sub-processor is a vendor that Graine AI (Mavrix AI Private Limited) engages to process a customer's personal data on Graine's behalf. This list names each one, why Graine uses it, what data it handles, where it processes that data, the basis for any transfer outside India, and when it is used.

Last updated 3 Nov 2026. Every row is true as of that date. The Trust Center at www.graine.ai/trust shows the same vendors. Graine's consumer mobile product is a separate product with its own privacy notice, and its vendors are not listed here.

2. How to read this list

COLUMN	WHAT IT TELLS YOU
Vendor	The company or service
Purpose	What Graine uses it for
Data it handles	The data that reaches the vendor
Location	Where the vendor processes the data, stated only where Graine's own configuration pins it
Transfer basis	The basis for processing outside India, and the status of processor terms with the vendor
Used when	Whether the vendor is always used, or only when a customer or a setting calls for it

How to read "On request". "On request" means Graine has not pinned the location in its own configuration, and does not state a region it has not confirmed. Write to founders@graine.ai to ask where a vendor processes your data. Graine replies with what it has confirmed at that time, and says so where it has confirmed nothing. A location shown in the table is a location Graine has configured; written confirmation from each vendor is Being rolled out.

How to read "Transfer basis". Each row uses these short forms:

SHORT FORM	MEANING
In India	The vendor processes the data in India, so there is no transfer outside India
DPDP s.16	DPDP Act s.16: transfers are allowed except to countries the Government restricts; none is notified as of 3 Nov 2026. Rule 15 adds that a transfer is subject to any requirement the Government specifies, from 13 May 2027
DPDP s.16 if outside India	The location is "On request", so Graine cannot yet say whether the processing leaves India. If it does, DPDP s.16 applies as above
Processor terms: in the vendor's terms	The vendor's data processing terms are part of, or incorporated in, the terms Graine accepted. Graine does not yet have its own signed or downloaded copy on file (as of 4 Nov 2026)
Processor terms: offered	The vendor offers data processing terms on request, in its app, with a cover page or with an order form. None is signed or on file yet

SHORT FORM	MEANING
Processor terms: none published	The vendor publishes no data processing terms. Obtaining terms, or replacing the vendor, is Planned
Processor terms: per provider	It depends on the provider a customer chooses. No copy is on file for any of them yet
Own controller	The vendor acts for itself under its own agreement, not as Graine's processor
UK adequacy (EU data)	For EU personal data, the United Kingdom has an adequacy decision from the European Union
SCCs	Standard Contractual Clauses (offered with the Data Processing Addendum, or DPA), for EU or UK personal data

3. Hosting and storage

VENDOR	PURPOSE	DATA IT HANDLES	LOCATION	TRANSFER BASIS	USED WHEN
Amazon Web Services	Hosting for the call platform: compute, load balancing, an execution store, and stored audio and documents	What the platform processes while it runs (call details, phone numbers, transcripts, agent settings), plus stored audio, invoices and business-verification documents	India (Mumbai)	In India · Processor terms: in the vendor's terms · SCCs	Always
Amazon Web Services: Secrets Manager	Stores API keys, and the carrier and push credentials that customers connect	API keys; carrier account credentials; push-notification credentials	United States (N. Virginia) for API keys; India (Mumbai) for carrier and push credentials	DPDP s.16 (API keys) · In India (carrier and push credentials) · Processor terms: in the vendor's terms · SCCs	Always
MongoDB Atlas	Primary database	Agent settings; call records, transcripts and their analysis; contacts and campaigns, including phone numbers; the audit trail	On request	DPDP s.16 if outside India · Processor terms: in the vendor's terms · SCCs	Always
Wasabi	Object storage for call recordings and voice-clone samples	Call recordings; voice samples	United Kingdom	DPDP s.16 · UK adequacy (EU data) · Processor terms: in the vendor's terms · SCCs	When a call is recorded or a voice is cloned
Vercel	Hosts the website and dashboard and the endpoints the in-app SDK and web widget use; page-view analytics and speed measurements, with consent	Dashboard sessions; workspace users' account details; in-app session requests; page views	India (Mumbai) for the dashboard's main API functions; others on request	In India (main API functions) · DPDP s.16 if outside India (others) · Processor terms: in the vendor's terms (paid plans) · SCCs	Always for the dashboard; analytics only with consent

VENDOR	PURPOSE	DATA IT HANDLES	LOCATION	TRANSFER BASIS	USED WHEN
Neon	The dashboard's database	Workspace users and organisations; billing and invoices; workflows; consent records; the dashboard activity log; requests sent through the website	On request	DPDP s.16 if outside India · Processor terms: in the vendor's terms · SCCs	Always
LanceDB Cloud	Search index for agent knowledge bases	Text chunks and embeddings of the documents a customer uploads	United States (N. Virginia)	DPDP s.16 · Processor terms: none published · SCCs	When an agent uses a knowledge base

4. AI, speech and voice

VENDOR	PURPOSE	DATA IT HANDLES	LOCATION	TRANSFER BASIS	USED WHEN
Microsoft Azure OpenAI	Language model for the agents that use it, and for post-call summaries, translation, analysis and checks	Conversation text and transcripts; prompts, including the variables a customer supplies	On request	DPDP s.16 if outside India · Processor terms: in the vendor's terms · SCCs	For agents that use it, and for post-call processing
OpenAI	Language-model fallback, and the dashboard's call evaluations, assistant and voice-studio helper	Transcripts; prompts; evaluation conversations	On request	DPDP s.16 if outside India · Processor terms: in the vendor's terms · SCCs	As a fallback, and when a customer uses evaluations, the assistant or the voice-studio helper
Groq	Language model for agents that select it, and a last-resort fallback	Transcripts; prompts	On request	DPDP s.16 if outside India · Processor terms: in the vendor's terms · SCCs	When selected for an agent, and as a last-resort fallback
Sarvam AI	Speech-to-text, text-to-speech, language detection, transliteration, a language model when selected, and reading uploaded knowledge-base documents	Call audio; transcripts; text to be spoken; uploaded documents	On request	DPDP s.16 if outside India · Processor terms: in the vendor's terms · SCCs	When selected for an agent, and when a knowledge-base document is read
Deepgram	Speech-to-text (the platform's fallback), and text-to-speech when selected	Call audio; text to be spoken	On request	DPDP s.16 if outside India · Processor terms: offered · SCCs	As the speech-to-text fallback, and when selected for an agent
Gnani	Speech-to-text when selected for an agent	Call audio	On request	DPDP s.16 if outside India · Processor terms: none published · SCCs	When selected for an agent
ElevenLabs	Text-to-speech, and speech-to-text when selected	Text to be spoken; call audio when used for speech-to-text	On request	DPDP s.16 if outside India · Processor terms: in the vendor's terms · SCCs	When selected for an agent

VENDOR	PURPOSE	DATA IT HANDLES	LOCATION	TRANSFER BASIS	USED WHEN
Cartesia	Text-to-speech, and voice cloning for the Voice Library	Text to be spoken; recordings submitted for cloning	On request	DPDP s.16 if outside India · Processor terms: in the vendor's terms · SCCs	When selected for an agent, and when a member clones a voice
TimePay	Text-to-speech when selected for an agent	Text to be spoken	On request	DPDP s.16 if outside India · Processor terms: none published · SCCs	When selected for an agent
Amazon Web Services: Polly	Fallback text-to-speech when an agent has no voice set	Text to be spoken	India (Mumbai)	In India · Processor terms: in the vendor's terms · SCCs	When an agent has no voice set
mem0	Agent memory for returning users, only when a customer turns memory on for an agent	Redacted facts from conversations, keyed by a one-way hashed user id	On request	DPDP s.16 if outside India · Processor terms: offered · SCCs	Only when memory is turned on for an agent

5. Telephony and real-time media

VENDOR	PURPOSE	DATA IT HANDLES	LOCATION	TRANSFER BASIS	USED WHEN
jambonz.cloud	Call control and media for workspaces set up on the hosted voice network	Call audio; phone numbers; call events	On request	DPDP s.16 if outside India · Processor terms: none published · SCCs	For workspaces on the hosted voice network
Exotel	Telephone carrier, on the customer's Exotel account or Graine's	Call audio; phone numbers; the carrier's own call recordings	On request	DPDP s.16 if outside India · Processor terms: offered · SCCs	When calls use Exotel
Twilio	Telephone carrier, where one is set up for a workspace	Call audio; phone numbers	On request	DPDP s.16 if outside India · Processor terms: in the vendor's terms · SCCs	Where set up for a workspace
Metered	Relays web and in-app calls when a direct connection isn't possible	Encrypted call media in transit; IP addresses	On request	DPDP s.16 if outside India · Processor terms: in the vendor's terms · SCCs	When a direct connection isn't possible

6. Business and communications

VENDOR	PURPOSE	DATA IT HANDLES	LOCATION	TRANSFER BASIS	USED WHEN
Stytch	Sign-in for workspace users	Names, email addresses, workspace membership and sessions	On request	DPDP s.16 if outside India · Processor terms: in the vendor's terms · SCCs	Always
Brevo	Email: invitations, sign-in codes, approval notices, invoices, alerts and the replies to the website's forms	Names; email addresses; invoice details	On request	DPDP s.16 if outside India · Processor terms: in the vendor's terms · SCCs	Whenever Graine sends one of these emails

VENDOR	PURPOSE	DATA IT HANDLES	LOCATION	TRANSFER BASIS	USED WHEN
OneSignal	Browser notifications for the approvals inbox, for people who turn them on	The member id, the browser's notification subscription, and the notification's text, which can name a colleague and an agent or campaign	On request	DPDP s.16 if outside India · Processor terms: offered · SCCs	Only for people who turn on browser notifications
PayU	Payments for wallet top-ups	Payer name, email address and phone number; the amount	On request	DPDP s.16 if outside India · Own controller · SCCs	When a wallet top-up is paid
Surepass	Checks a GSTIN during business verification	GSTIN and registered business details	On request	DPDP s.16 if outside India · Processor terms: none published · SCCs	During business verification
Crisp	Support chat on the website and in the dashboard, once the user agrees to it	Name, email address and chat messages	On request	DPDP s.16 if outside India · Processor terms: offered · SCCs	Only after the user agrees
Google Analytics	Website analytics, when switched on and once the visitor agrees to it	Page views; IP address; device details	On request	DPDP s.16 if outside India · Processor terms: offered · SCCs	Only when switched on, and after consent
ipapi.co	Shows the viewer's approximate location in Call History	The viewer's IP address	On request	DPDP s.16 if outside India · Processor terms: in the vendor's terms · SCCs	When someone views Call History
Google Fonts, jsDelivr, Cloudinary, Tencent EdgeOne	Fonts and static files for the website and dashboard	The visitor's IP address	On request	DPDP s.16 if outside India · Processor terms: in the terms of jsDelivr and EdgeOne; offered by Cloudinary; none published by Google Fonts · SCCs	When a page loads

7. Monitoring and engineering

VENDOR	PURPOSE	DATA IT HANDLES	LOCATION	TRANSFER BASIS	USED WHEN
Better Stack	Uptime heartbeats, and log storage when enabled	Service logs, which can contain phone numbers and fragments of transcripts until masked logging is fully rolled out	On request	DPDP s.16 if outside India · Processor terms: in the vendor's terms · SCCs	Heartbeats: always. Log storage: when enabled

Tools that never handle customer personal data (source hosting, container registries and DNS) are not listed.

8. Providers a customer selects for an agent

A customer-selected provider is a speech, language or search provider that a customer chooses for an agent. These providers process prompts, text or audio only when a customer selects one. They are named here so that nobody is surprised.

PURPOSE	PROVIDERS	DATA IT HANDLES	LOCATION	TRANSFER BASIS	USED WHEN
Alternative language models	Anthropic, Google Gemini, Together AI, OpenRouter, AWS Bedrock, Cohere, DeepInfra, Perplexity, DeepSeek, Fireworks AI	Prompts; conversation text	On request	DPDP s.16 if outside India · Processor terms: per provider · SCCs	Only when selected for an agent
Alternative speech-to-text and text-to-speech	AssemblyAI, Gladia, Soniox, Kalpa, Maya, Navana, Gemini, Azure AI Speech, Smallest.ai, Rime	Call audio; text to be spoken	On request	DPDP s.16 if outside India · Processor terms: per provider · SCCs	Only when selected for an agent
Language-switch judge for multilingual agents	TypeSafe	Prompts or text	On request	DPDP s.16 if outside India · Processor terms: in the vendor's terms · SCCs	Only when selected for a multilingual agent
Web search in workflows and agent tools	Firecrawl, Exa, Parallel, Tavily	Search queries	On request	DPDP s.16 if outside India · Processor terms: per provider · SCCs	Only when a workflow or agent tool searches the web

Whose processor is it? Most of these providers need the customer's own key and account. Where a customer connects a provider with its own account, the provider is the customer's processor, not Graine's, and the customer's agreement with it applies. Where Graine holds the account, the provider is Graine's sub-processor for that agent, and the notice commitments in section 10 apply to it.

Further speech and language providers may be selected per agent; each is added here before it processes customer data.

9. Customer-connected services

A customer's own carrier or SIP trunk, WhatsApp Business account, push-notification credentials, APIs, MCP servers and workflow integrations (a CRM, a calendar, a ticketing tool) run on the customer's own accounts. Graine acts on the customer's instructions when it uses them. They are the customer's processors, not Graine's sub-processors, and the customer is responsible for its agreements with them.

10. How changes are announced

1. Graine gives at least 30 days' written notice before it adds or replaces a sub-processor, or changes where one processes customer personal data.
2. The notice goes by email to the Admins of each workspace, and as a dated entry in the Revision history of this page.
3. A customer may object on reasonable data-protection grounds by writing to founders@graine.ai within the notice period.
4. Graine then works with the customer to meet the objection. The Data Processing Addendum sets out what happens if the two cannot agree. Where no addendum has been signed, the outcome is agreed between the customer and Graine.

The detailed objection terms are in the Data Processing Addendum, which is available on request.

11. Processor terms, vendors' own sub-processors, and training

As of 4 Nov 2026, Graine has no signed or downloaded data processing agreement on file with any vendor on this list. Most of the vendors include data processing terms in the terms Graine accepted, and some offer them on request, in their app or with an order form; a few publish none (see the Transfer basis column). Filing those copies, obtaining terms where a vendor has none, confirming each vendor's region in writing and reviewing the vendor's assurance reports are Planned.

Vendors can use sub-processors of their own. This list does not show them. Obtaining each vendor's own list is part of the same work.

Graine does not use customer data to train or fine-tune AI models. What AI and speech vendors do with data sent to them is set by their own terms. Graine has read each vendor's published terms: several of the vendors above use content to improve their models by default unless the customer opts out, and Twilio's terms, which also govern Stytch, let it use customer content for its own purposes with no opt-out. Graine has decided to opt out wherever a vendor allows it: the setting for Deepgram is built and being switched on (Being rolled out), and the opt-outs in the other vendors' settings are owner actions (Planned).

12. Contact

Questions, objections and requests for the Data Processing Addendum go to founders@graine.ai. The Security Overview describes how Graine protects the data these vendors handle.

Revision history

VERSION	DATE	CHANGE	APPROVED BY
1.0	2026-11-03	First issue, approved	Rishabh Bhanot, Founder
1.1	2026-11-04	Recordings' storage location corrected: the United Kingdom (Wasabi eu-west-3), not France; vendor training defaults stated; vendors' processor terms stated (in their terms or offered; Graine's copy not yet on file)	Correction; the approval of 3 Nov 2026 stands