

Subprocessor and International Transfers Register

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1. Purpose

Lists subprocessors used for service delivery and identifies transfer mechanism controls.

2. Current Subprocessors

Subprocessor	Service	Data Processed	Hosting/Region	Transfer Mechanism	DPA in Place
Google (Firebase/Cloud)	Auth, database, storage, platform services	Account and learning data, security logs	[Region(s)]	[Adequacy/IDTA/UK Addendum/SCC]	Yes
Netlify	Hosting/CDN/serverless infrastructure	Service request metadata, function execution context	[Region(s)]	[Adequacy/IDTA/UK Addendum/SCC]	Yes
OpenAI (if enabled)	Text-to-speech generation	Prompt text submitted for TTS	[Region(s)]	[Adequacy/IDTA/UK Addendum/SCC]	Yes

If optional provider features are disabled, corresponding processing may not occur.

3. Change Management

- Controller notification period: [30] days before material subprocessor change.
- Objection channel: [privacy@your-domain].
- Objections are assessed for objective data protection risk and addressed commercially/technically.

4. Transfer Risk Controls

- Transfer impact assessment performed where required.
- Contractual transfer mechanism maintained and reviewed.

- Supplementary technical controls applied proportionate to risk.