360 Sprint — Sub-processor list

Annex 1 — Sub-Processors · Last updated: 2026-10-15 · 360 Sprint ApS, Denmark

The following third-party services process personal data as part of providing 360 Sprint:

PROVIDER	PURPOSE	DATA CATEGORIES	LOCATION	ENCRYPTION	TRANSFER SAFEGUARDS	DPA	DETAILS
AWS Bedrock (Claude AI) Amazon Web Services EMEA SARL, 38 Avenue John F. Kennedy, L-1855, Luxembourg	Primary AI inference (strategic analysis, chat, document processing)	Content data (PUBLIC/INTERNAL fields), AI interaction metadata	Ireland EEA/EU	AES-256 / TLS 1.3	N/A (EU entity, no international transfer)	Signed	Anthropic Claude models (Opus 4.6, Sonnet 4.6, Haiku 4.5) via AWS Bedrock cross-region inference in eu-west-1 (Ireland). Chat and strategy analysis are served in the EU only; a request that cannot be served in the EU fails rather than leaves it. AWS Bedrock Guardrails are applied to every chat and analysis request. No model training on customer data. STS role-based access with least-privilege IAM.
Railway Railway Corporation, San Francisco, CA, USA	Application hosting	All application data	Netherlands EEA/EU	AES-256-GCM / TLS 1.2+	DPA	Signed	EU West hosting region. Railway KMS for key management. Private networking between all services.
Scaleway Managed Database Scaleway SAS (Iliad Group), 8 rue de la Ville l'Évêque, 75008 Paris, France	Primary database	All application data	France EEA/EU	AES-256 / TLS 1.3	N/A (EU entity, no international transfer)	Signed	ISO 27001:2022 and HDS certified. Managed PostgreSQL in Paris (fr-par). Automated daily backups with encryption at rest. IP allowlisting enabled. EU-sovereign — no US jurisdiction (CLOUD Act does not apply).
Scaleway Object Storage Scaleway SAS (Iliad Group), 8 rue de la Ville l'Évêque, 75008 Paris, France	File storage	Uploaded files and exports	France EEA/EU	AES-256 / TLS 1.3	N/A (EU entity, no international transfer)	Signed	ISO 27001:2022 and HDS certified. S3-compatible object storage in Paris (fr-par). Encryption at rest. EU-sovereign — no US jurisdiction (CLOUD Act does not apply).
Clerk Clerk, Inc., San Francisco, CA, USA	Authentication & user management	Email, name, session data	USA	AES-256 / TLS 1.2+	DPA, SCCs, EU-US DPF	Signed	SOC 2 Type II certified. EU-US Data Privacy Framework (DPF) certified. GDPR Article 27 representative: VeraSafe (Ireland). Supervisory authority: Irish Data Protection Commission. DPA with Standard Contractual Clauses (SCCs) as fallback. No passwords stored in 360 Sprint — all credentials managed entirely by Clerk infrastructure (hashed, PKCE, rotating refresh tokens). RBAC with 7 role levels. MFA support.
Resend Resend, Inc., San Francisco, CA, USA	Transactional email	Email addresses, email content	USA	AES-256 / TLS 1.2+	DPA, DPF, SCCs	Signed	SOC 2 Type II certified. Used only for transactional notifications.
Sentry Functional Software, Inc., 45 Fremont St, San Francisco, CA 94105, USA	Error tracking & monitoring	Error metadata, stack traces (PII scrubbed)	USA	AES-256 / TLS 1.2+	DPA, SCCs, EU-US DPF	Signed	SOC 2 Type II certified. PII scrubbing (CPR, email, API keys, IBAN) before transmission. Session replays use maskAllText.

PROVIDER	PURPOSE	DATA CATEGORIES	LOCATION	ENCRYPTION	TRANSFER SAFEGUARDS	DPA	DETAILS
Aikido Security Aikido Security BV, Ghent, Belgium	WAF & runtime protection	Request metadata	Belgium EEA/EU	TLS 1.2+	DPA	Signed	SOC 2 Type II certified. GDPR compliant. EU-based company and infrastructure.
Plausible Analytics Plausible Insights OÜ, Västriku tn 2, 50403, Tartu, Estonia	Privacy-friendly web analytics	Page views, referrers, device type (no cookies, no PII)	Germany EEA/EU	TLS 1.2+	N/A (EU entity, no international transfer)	Signed	EU-based company (Estonia). Infrastructure hosted on Hetzner (Germany). No cookies, no personal data collected. GDPR compliant by design — no consent banner required. Open source.
ElevenLabs ElevenLabs, Inc., 1601 Vine Street, Los Angeles, CA 90028, USA	Voice processing (speech-to-text, text-to-speech, podcasts)	Voice audio data, generated speech audio, podcast scripts	To be confirmed USA	AES-256 / TLS 1.2+	DPA, SCCs	Signed	Web DPA (ToS-incorporated, updated Nov 11, 2025). Used for speech-to-text, text-to-speech and podcast generation. EU data residency is available and enforced only when configured. No model training on customer data. Voice data is never combined with user identity data.
OpenAI (voice beta) OpenAI, LLC, San Francisco, CA, USA	Real-time voice facilitation (beta, opt-in)	Voice audio data, session transcripts, saved canvas content	To be confirmed USA	TLS 1.2+	DPA, SCCs	Pending	Used only by the live voice facilitation beta, which is off unless LIVE_FACILITATION_ENABLED is set and the organisation opts in. Not used for chat or strategy analysis.
Expo (Push Notifications) Expo, Inc., 140 2nd Street, San Francisco, CA 94105, USA	Push notification relay service	Device tokens, notification content	USA	TLS 1.2+	DPA, SCCs	Pending	Expo acts as a relay to Apple Push Notification Service (APNs) and Google Firebase Cloud Messaging (FCM). Device tokens are stored encrypted. Notification content is transient and not persisted by Expo after delivery.
Apple Push Notification Service (APNs) Apple Inc., One Apple Park Way, Cupertino, CA 95014, USA	iOS push notification delivery	Device tokens, notification payloads	USA	TLS 1.2+ / AES-128-GCM	Transitive via Expo DPA, Apple ToS	Signed	Transitive sub-processor accessed via Expo. Apple does not store notification content after delivery. Device tokens are opaque identifiers that cannot be reversed to identify users.
Google Firebase Cloud Messaging (FCM) Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland	Android push notification delivery	Device tokens, notification payloads	Ireland EEA/EU	TLS 1.2+ / AES-256	Transitive via Expo DPA, Google DPA	Signed	Transitive sub-processor accessed via Expo. Google Ireland is the data controller for EU users. Notification payloads are transient. FCM registration tokens are rotated periodically.
Featurebase Featurebase OÜ, Tallinn, Estonia	Product feedback collection, voting, roadmap, and changelog	User name, email, feedback text, browser metadata	Germany EEA/EU	AES-256 / TLS 1.2+	N/A (EU hosting, Germany)	Signed	SOC 2 Type II certified. Data hosted in Germany (DigitalOcean/Hetzner). User feedback, votes, and comments. No RESTRICTED or CONFIDENTIAL fields sent. Featurebase KB feature disabled — docs handled by Mintlify.

Customers are notified of changes with 30 days' notice via email.

Data protection: privacy@360sprint.dk