



 50skills

Security & Data Governance Overview

50skills — Security & Data Governance Overview

50skills ehf. is an Icelandic HR technology company. Our platform, **Journeys**, enables organizations to build, run, and govern HR and operational processes with full transparency and control. We serve customers across regulated industries including banking, aviation, government, and large-scale enterprise operations. This document provides a complete overview of our security posture, data handling practices, and compliance framework for enterprise procurement and security review teams.

100%

EU Data Residency

All customer data hosted within the European Union

0

AI Model Training

No customer data used to train or fine-tune any AI models

4

Enterprise References

Regulated-industry customers available for reference calls

CE+

Cyber Essentials Plus

Independently verified, active certification

Hosting & Data Residency

All customer data is hosted entirely within the European Union. Our application runs on **Heroku** (a Salesforce company) using Amazon Web Services data centers in Ireland. File storage is handled via **AWS S3**, also located in Ireland. Search functionality is powered by Elasticsearch, likewise hosted in Ireland. Every layer of the application stack is EU-resident by default.

No customer data is stored or processed outside the EU unless explicitly configured by the customer through integrations they choose to add themselves. 50skills does not unilaterally route data to non-EU infrastructure.

Application Layer

Heroku (Salesforce)
AWS Ireland

File Storage

AWS S3
Ireland

Search

Elasticsearch
Ireland

Data Boundary

EU-only by default
No unilateral transfer

AI Data Handling

AI features in Journeys are entirely optional and can be fully disabled per customer account on request. We operate two distinct AI capabilities, each with clear and transparent data handling practices.

AI Agents — OpenAI API

Powered by the OpenAI API. All processing takes place within the EU. Customers can disable this feature entirely on request.

AI Navigator — Anthropic (Claude)

AI Navigator is powered by Anthropic (Claude) via Amazon Bedrock, using EU-only inference profiles. All processing is routed within EU regions.

- 📄 **Critical assurance for regulated buyers:** No customer data is used to train, fine-tune, or improve any AI or machine learning model — by 50skills or any of our AI providers. Your data is used solely to execute the workflow action you have configured.

Certifications & Security Practices

50skills maintains active, independently verified security certifications and follows recognized application security standards. Our infrastructure providers hold enterprise-grade certifications that extend baseline assurance to all customers.

Cyber Essentials Plus — Active

Independently verified by the IASME Consortium (BlockMark Registry). This certification is renewed on a recurring basis and confirms our controls meet the UK government's baseline cybersecurity standard at the highest tier.

Penetration Testing — Cobalt

Independent penetration testing is conducted via Cobalt on a recurring basis. Findings are triaged, remediated, and tracked. Results are available under NDA for enterprise customers conducting formal security reviews.

Infrastructure Certifications — SOC 2 Type II & ISO 27001

Heroku/Salesforce and AWS both maintain SOC 2 Type II and ISO 27001 certifications. These apply to the underlying infrastructure on which all 50skills services run.

OWASP ASVS — Application Development Standard

Application development follows the OWASP Application Security Verification Standard (ASVS). This governs how our engineering team writes, reviews, and tests application code for security vulnerabilities.

Data Processing Agreement & Legal Framework

A standard Data Processing Agreement is included with all engagements. The DPA is governed by Icelandic law. Iceland is an EEA member state, meaning **GDPR applies directly** — no additional transfer mechanisms or Standard Contractual Clauses are required for EU/EEA data flows.

We are open to reviewing customer-proposed DPAs where needed. Enterprise procurement teams with bespoke DPA requirements should contact our Data Protection Officer directly.

Key Legal Documents

- **Data Processing Agreement:**
www.50skills.com/dpa-journeys
- **Terms of Service:**
www.50skills.com/terms-of-use-journeys
- **Contact us for sub-processor register**
(security@50skills.com)

Non-critical sub-processors — including SMS delivery and AI features — can be turned off per customer on request. Our sub-processor register is maintained and updated on a regular basis.

GDPR Coverage

Iceland is an EEA member state. GDPR applies directly. No SCCs required for EU/EEA data.

Customer DPA reviews accepted on request.

Workflow Transparency & Audit Trail

Transparency is a foundational design principle of Journeys — not an afterthought. Every action in every workflow is visible and fully auditable. This is especially significant for organizations operating in regulated environments where audit readiness and evidential records of process execution are mandatory.



Full Workflow Visibility

Every action in every workflow is visible and auditable at all times. There are no hidden processing steps or opaque automations.



Customer-Controlled AI Inputs

Customers control exactly what data enters any AI action. No data is forwarded to an AI provider without explicit configuration by the customer.



AI Transparency

Where AI is used within a workflow, the prompt, the input data, and the output are all fully visible. There is no black box. Customers see exactly what was sent and what was returned.



Complete Audit Trail

A full audit trail is maintained on all actions and all data changes across the platform. Records are available for compliance review, internal audit, and regulatory reporting.

Integration Security

Integrations in Journeys are fully customer-controlled. Customers add and authenticate their own connections to third-party systems. 50skills does not access customer systems without explicit configuration by the customer. This architecture ensures that integration scope is always defined and authorized by the customer, not assumed by the platform.

Standard Integration Model

When an integration is added, all available API endpoints are surfaced and visible to the customer administrator. Customers can selectively enable or disable specific endpoints, limiting the data surface area to only what is required for their use case.

Webhook-Based Architecture

For organizations with strict inbound-data policies, we support a **webhook-based architecture** where the customer's system fetches data on demand rather than receiving pushed payloads. This model is actively used by high-security customers such as deCODE Genetics.

- ❏ **Endpoint visibility:** When any integration is configured, all available API endpoints are visible to the customer. You always know the full scope of what is connected.

Enterprise References

The following organizations have each completed formal security and compliance reviews with 50skills and are active customers. These are regulated-industry enterprises across banking, aviation, government, and high-security scientific operations. Reference calls can be arranged on request — please contact us using the details on the following page.

Central Bank of Iceland

Core operational workflows. Full security review completed.

Icelandair

Crew onboarding and operations. Full security review completed.

City of Reykjavik

Municipality operations at scale. Full security review completed.

deCODE Genetics

High-security environment. Uses webhook-based integration architecture.

These references span banking, aviation, public sector, and life sciences — four of the most compliance-intensive operating environments in enterprise technology. Each customer conducted their own independent security evaluation prior to deployment.

Contact & Further Information

For security inquiries, DPA reviews, sub-processor questions, or to arrange a reference call with an existing customer, please reach out using the contacts below. Our Data Protection Officer is available to engage directly with procurement, legal, and compliance teams.

Security Inquiries & Data Protection Officer:

Georg Olafsson
security@50skills.com

Key Resources

- **Security Overview:**
www.50skills.com/security
- **Data Processing Agreement:**
www.50skills.com/dpa-journeys
- **Terms of Service:**
www.50skills.com/terms-of-use-journeys

50skills is committed to full transparency with enterprise security and compliance teams. We welcome detailed technical reviews and direct conversations with your procurement, legal, and information security stakeholders.