

CLOSEDAY LTD

SUB-PROCESSOR REGISTER

Effective from: February 1, 2026

This register lists the sub-processors engaged by Closeday Ltd to process personal data on behalf of customers in accordance with our Data Processing Agreement (DPA). For any material changes to sub-processor arrangements, customers will be notified in accordance with the DPA terms.

Sub-Processor	Purpose	Personal Data Processed	Location	Transfer Mechanism
Core Platform Infrastructure				
Digital Ocean	Cloud hosting and infrastructure for Closeday platform	All case data including director/shareholder/stockholder names, contact details, financial information, company records	UK	N/A (UK hosting)
Cloudflare	CDN, DDoS protection, and security services	IP addresses, access logs, request metadata	Global (edge)	UK-US Data Bridge (DPF) + SCCs
Customer Communication & Collaboration				
Google Workspace	Email, documents, and collaboration	Contact data, correspondence	Global	UK-US Data Bridge (DPF) + SCCs
HubSpot	CRM and marketing automation	Contact data, correspondence	EU	UK Adequacy (EU hosting)
Attio	CRM for partnerships and recruitment	Contact data, correspondence	Global	SCCs + UK Addendum
Slack	Internal team communication	Contact data, correspondence	US	UK-US Data Bridge (DPF)
AI & Productivity Tools				
Claude	AI assistance for document drafting and research	N/A (No PII)	US	SCCs + UK Addendum
Payment Processing & Finance				
Stripe	Payment processing	Cardholder names, payment details, billing addresses, transaction records	Ireland / US	UK-US Data Bridge (DPF) + SCCs
Xero	Accounting and financial management	Supplier/customer contact data, invoice details, financial records	Global	SCCs + UK Addendum
Market Intelligence & Sales				

Beauhurst	UK company data and market intelligence	Company officer names, business contact details (public data)	UK	N/A (UK processor)
Workflow Automation & Integration				
Zapier	Workflow automation between services	Data passing between connected services (varies by workflow)	US	UK-US Data Bridge (DPF) + SCCs
Sakari.io	SMS communications	Phone numbers, message content	US	SCCs + UK Addendum
Internal Operations (Limited Customer Data Exposure)				
Notion	Internal documentation & collaboration, recruitment	May contain case notes, recruitment candidate information	US	SCCs
Official				
London Virtual Address	Registered office services	Company correspondence, officer names	UK	N/A (UK processor)
Advertising & Analytics				
Google Ads	Digital advertising	Anonymised/aggregated conversion data, IP addresses	Global	UK-US Data Bridge (DPF) + SCCs

Transfer Mechanism Key

UK-US Data Bridge (DPF): Sub-processor is certified under the EU-US Data Privacy Framework with UK Extension, providing adequacy-equivalent protection for UK-US transfers.

SCCs: Standard Contractual Clauses approved by the European Commission (2021/914), providing contractual safeguards for international transfers.

UK Addendum: International Data Transfer Addendum to the EU SCCs issued by the UK ICO under the Data Protection Act 2018.

UK Adequacy: Transfer to a country/territory with UK adequacy regulations (e.g., EU/EEA member states).

N/A: No international transfer mechanism required (UK-based processor or no personal data transfer).