

Subprocessor Directory

EmpowerGPT engages a limited set of subprocessors to provide infrastructure, AI capabilities, analytics, and security. All subprocessors are configured to ensure EU data residency, GDPR alignment, and minimal external data exposure.

Subprocessor List

Subprocessor	Category	Purpose	Data Categories	Processing Location	Safeguards
Microsoft Azure	Infrastructure	Core infrastructure, compute, storage, networking (AKS, Blob Storage, PostgreSQL, VNet)	Prompts, documents, embeddings, metadata, logs	Germany West Central	<ul style="list-style-type: none"> Private endpoints only Encryption at rest and in transit Strict EU data residency
Azure OpenAI	AI / ML	LLM inference and embeddings (primary AI layer)	Prompts, completions, embeddings	EU Data Zone	<ul style="list-style-type: none"> Zero data retention (abuse monitoring disabled under approved exemption) No prompt/completion storage No cross-region processing
Google Cloud AI (Gemini + Claude via GCP)	AI / ML	Gemini models (Google) and Claude models via GCP integration	Prompts, responses, context data	EU region only (configured deployment)	<ul style="list-style-type: none"> Processing confined to EU-based GCP regions No cross-region transfer (as configured) Enterprise-grade data protection controls via GCP
Azure Speech Service	Speech	Voice-to-text transcription	Audio input, transcription output	EU-aligned Azure region	<ul style="list-style-type: none"> EU-aligned processing
E2B	Code Execution	Secure sandboxed code execution (code interpreter)	User-submitted code, execution outputs, temporary runtime data	Vendor-managed infrastructure	<ul style="list-style-type: none"> Isolated, ephemeral execution environments

Subprocessor	Category	Purpose	Data Categories	Processing Location	Safeguards
Cloudflare	Edge / Security	DNS, CDN, WAF, DDoS protection	IP address, request metadata	Global edge network	<ul style="list-style-type: none"> Fully GDPR-compliant setup
PostHog	Analytics	Product and usage analytics	Event data, usage metadata	EU (configured deployment)	<ul style="list-style-type: none"> Fully GDPR-compliant setup Minimal personal data collection No AI prompt or sensitive content tracking

Self-Hosted Components (Not Subprocessors)

The following components are internally hosted within EmpowerGPT infrastructure. They are deployed inside the Microsoft Azure environment (AKS), running on EmpowerGPT's own servers, and do not send data to the original software creators.

Component	Notes
Keycloak	Deployed inside Microsoft Azure (AKS). Running on EmpowerGPT's own servers. No data sent to original software creators.
Grafana	
Prometheus	
Grafana Loki	

Data Residency & Transfers

Policy: All customer data is processed within the EU unless explicitly configured otherwise for dedicated enterprise deployments.

Component	Processing Region
Primary Infrastructure (Azure)	Germany West Central
Azure OpenAI	EU Data Zone
Google Cloud AI (Gemini + Claude)	EU region
Azure Speech Service	EU region
PostHog	EU region

Data Retention & Deletion

Storage Type	Retention Period / Details
Blob Storage	Soft delete: 95 days · Versioning enabled
PostgreSQL Backups	35 days
Logs	90 days
Metrics	10 days
Deletion Capabilities	On-demand deletion via internal services · Tenant-level purge (multi-tenant) · Full infrastructure teardown (dedicated environments)

Change Management

EmpowerGPT will update this directory prior to onboarding any new subprocessors. Customers will be notified of material changes in accordance with contractual obligations.

For questions regarding this directory, contact@empowergpt.ai