GRC+

Sub-Processors

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LATEST VERSION
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To run our business and deliver our services, we use the service providers below. Each processes personal dataAny information relating to an identified or identifiable natural person, the data subject. A person is identifiable if they can be identified directly or indirectly, for example by a name, an identification number, location data, an online identifier or factors specific to their identity. only on our instructions, under a data processing agreementA contract setting out how a processor handles personal data on a controller's behalf. Under GDPR Article 28(3), the processing must be governed by a contract or another binding legal act with specified terms. with confidentialityThe information-security property of keeping information from being disclosed to people, organisations or systems that are not authorised to receive it. Access restrictions and encryption help preserve confidentiality when information is stored, sent or processed. It concerns who can see information; it does not by itself ensure that the information is accurate or that a service remains available. and security obligations. Where data leaves the European Economic AreaThe area created by the EEA Agreement, which brings together the EU Member States and Iceland, Liechtenstein and Norway in the internal market. EU laws marked as having EEA relevance, such as the GDPR, can extend to those three countries., a GDPRGeneral Data Protection Regulation safeguard applies, as explained in our privacy notice.

1 Providers used for client work and communication

PROVIDER	WHAT FOR	WHERE THE DATA IS
Microsoft Ireland Operations Ltd (Microsoft 365)	E-mail, calendars, documents, file sharing, Microsoft Teams meetings and chat	EU (Microsoft EU Data Boundary)
HubSpot Ireland Ltd	Contact management (CRMCustomer Relationship Management), website forms, meeting scheduler, e-mail updates	EU (HubSpot EU data centre)
Anthropic (Claude), under commercial terms	AIArtificial Intelligence assistant for drafting and analysis, with human review. Client confidential data only where the client has agreed. Not used to train models.	United States (Standard Contractual ClausesModel data protection clauses adopted by the European Commission that provide appropriate safeguards for transfers of personal data to countries outside the EEA. Organisations use them in contracts with recipients outside the EEA.)

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2 Providers used for our website, payments and administration

PROVIDER	WHAT FOR	WHERE THE DATA IS
Kinsta Inc. on Google Cloud	Website hosting	Google Cloud data centre chosen for the site; company in the United States (Standard Contractual ClausesModel data protection clauses adopted by the European Commission that provide appropriate safeguards for transfers of personal data to countries outside the EEA. Organisations use them in contracts with recipients outside the EEA.)
Cloudflare Inc.	Website security and delivery (protection against attacks, caching), and the Turnstile check on our website forms that tells people from automated spam	Global network; company in the United States (Data Privacy FrameworkEU-US Data Privacy Framework)
Stripe Payments Europe Ltd	Online payments and subscriptions	EU and United States (Data Privacy FrameworkEU-US Data Privacy Framework)
Google Ireland Ltd (Google Analytics, Tag Manager)	Website statistics, only with your consentA freely given, specific, informed and unambiguous indication of a person's wishes, by a statement or clear affirmative action, agreeing to the processing of their personal data. The ePrivacy Directive, the DMA and the DGA rely on the same GDPR standard.	EU and United States (Data Privacy FrameworkEU-US Data Privacy Framework)
Microsoft (Clarity)	Website usage analysis, only with your consentA freely given, specific, informed and unambiguous indication of a person's wishes, by a statement or clear affirmative action, agreeing to the processing of their personal data. The ePrivacy Directive, the DMA and the DGA rely on the same GDPR standard.	United States (Data Privacy FrameworkEU-US Data Privacy Framework)

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PROVIDER	WHAT FOR	WHERE THE DATA IS
LinkedIn Ireland Unlimited Company	Measuring LinkedIn campaigns, only with your consentA freely given, specific, informed and unambiguous indication of a person's wishes, by a statement or clear affirmative action, agreeing to the processing of their personal data. The ePrivacy Directive, the DMA and the DGA rely on the same GDPR standard.	EU and United States (Data Privacy FrameworkEU-US Data Privacy Framework)
e-Boekhouden.nl	Bookkeeping and invoicing	Netherlands

3 Changes

We update this page before a new sub-processorIn the GDPR context, another organisation engaged by a processor to handle personal data for a controller. The controller decides why and how the data is used; the processor handles it on the controller's behalf. A sub-processor performs some of that work further down the supply chain. Appointment requires the controller's written authorisation and a binding contract providing the same protection for the data as the original controller-processor contract. starts processing client personal dataAny information relating to an identified or identifiable natural person, the data subject. A person is identifiable if they can be identified directly or indirectly, for example by a name, an identification number, location data, an online identifier or factors specific to their identity.. Clients for whom we act as a processorA person, public authority, agency or other body that processes personal data on behalf of a controller. The processing must be governed by a contract or another binding legal act under Union or Member State law meeting GDPR Article 28(3), and the processor must follow the applicable documented-instruction requirements. are notified at least 30 days in advance and may object on reasonable grounds, as set out in their data processing agreementA contract setting out how a processor handles personal data on a controller's behalf. Under GDPR Article 28(3), the processing must be governed by a contract or another binding legal act with specified terms.. Questions: privacy@grc.plus.

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