

Data Processing Summary & Sub-processor Register

A procurement-ready summary of how Ekselens Limited processes personal data on behalf of clients, the sub-processors engaged, and the data-retention schedule.

Ekselens Limited · Company no. 15750277 · 20 July 2026

01Controller / processor details

Legal entity	Ekselens Limited
Company number	15750277
VAT number	GB 468 4026 76
ICO registration	ZB907517
Registered office	27 Mortimer Street, London, W1T 3BL, United Kingdom
Office (correspondence)	167-169 Great Portland Street, London, W1W 5PF, United Kingdom
Governing law	England & Wales (UK GDPR & Data Protection Act 2018)
Data protection contact	info@ekselens.com

Ekselens acts as a **data controller** for its own marketing and enquiry data, and as a **data processor** for client personal data processed during an engagement, in each case under a written agreement.

02Sub-processor register

The following sub-processors may process personal data in delivering the service. The primary data residency for the application and database is **United States (us-central1 — Council Bluffs, Iowa)**. International transfers are protected by appropriate safeguards (UK IDTA / EU Standard Contractual Clauses) where applicable. Regions marked [TO CONFIRM] are being verified.

Sub-processor	Purpose	Data categories	Region
Resend	Transactional & notification email delivery (acknowledgements, reports, invitations).	Recipient name, email address, message content.	United States
Auth0 by Okta	Admin single sign-on, magic-link authentication and session management.	Email address, authentication metadata.	United Kingdom (Auth0 UK region)
Anthropic (Claude)	AI enrichment of assessment outputs — improvement plan, evidence reconciliation and move tailoring.	Assessment responses and engagement context (no special-category data).	United States
MongoDB	Primary application database (all stored application data).	All stored application data (leads, assessments, users, logs).	United States (us-central1 — Council Bluffs, Iowa)
Emergent	Application hosting platform and managed LLM gateway.	All application data in transit; hosting environment.	United States (us-central1 — Council Bluffs, Iowa)
Cloudinary	Brand-asset image hosting and CDN delivery.	Brand / marketing assets (no client personal data).	United States / global CDN
Microsoft Clarity	Product analytics and session insight — only active when the visitor consents to analytics cookies.	Pseudonymised usage / interaction data.	United States

03Data-retention schedule

Data category	Retention period	Lawful basis
Discovery / contact enquiries & leads	24 months after last contact	Legitimate interest — to respond and follow up on enquiries.
Assessment engagement data (identified clients)	Duration of the engagement + 6 years	Contract performance; UK statutory record-keeping.
Anonymous lite-assessment data	Erasable on request at any time; auto-purged after 12 months	Legitimate interest — to provide the self-assessment tool.

Data category	Retention period	Lawful basis
Newsletter subscribers	Until the subscriber unsubscribes	Consent — withdrawable at any time.
Admin audit logs	6 years	Governance, security and accountability.
Email delivery logs	13 months	Deliverability monitoring and dispute resolution.
Cookie-consent records	12 months	Demonstrating valid consent (UK PECR / GDPR).

04Data-subject rights & erasure

Individuals may exercise their UK GDPR rights (access, rectification, erasure, restriction, portability, objection) by contacting info@ekselens.com. Anonymous lite-assessment data can be erased immediately and self-service via the **Privacy** page. Verified requests for identified data are actioned within one month.

This summary is provided for procurement due diligence and does not replace the signed Data Processing Agreement, which governs in the event of conflict. © Ekselens Limited. Items marked [TO CONFIRM] are pending verification.