

## Sub-processor Register

v1.3 · Reviewed Jun 2026 · Next review May 2027

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### **Version 1.3 | June 2026 | Owner: Andrew James, CEO**

This register lists all third-party organisations (sub-processors) that process personal data on behalf of Halved Limited in connection with the Halved platform. It is maintained in accordance with Article 28 of UK GDPR and is reviewed annually or when sub-processors change.

Halved will provide schools with notice of any new or replacement sub-processor in accordance with the data processing agreement ('DPA') agreed between Halved and the school and allow any objection rights set out in that DPA before the sub-processor processes live student data.

Any planned or conditional sub-processor must not process live student data until the relevant DPA terms are in place and the school has been notified where required.

Conditional providers must be marked active only if the relevant service is enabled in a way that processes platform personal data.

### **Sub-processor Register**

Sub-processor	Parent entity	Services used	Purpose	Data categories processed	Location	DPA	Status
Microsoft Azure	Microsoft Corporation	App Service, PostgreSQL Flexible Server, Cache for Redis, Blob Storage, Key Vault, Log Analytics Workspace	Application hosting, primary data storage, secrets management, audit logging	Student names, email addresses, accessibility flags, assignment work, chat history, AI learning profiles, session data, API credentials	UK South (London)	Microsoft DPA	Active
Azure OpenAI Service	Microsoft Corporation	Azure OpenAI (gpt-4o, gpt-4.1-mini)	AI learning support inference, generating responses to student messages	Chat message text, lesson context, learning profile summary, role-based student identifier	UK South (London)	Microsoft DPA	Active
Azure Speech Service	Microsoft Corporation	Speech-to-text, Text-to-speech (en-GB-AdaMultilingualNeural)	Converting student voice input to text; converting AI text responses to audio	Student voice audio recordings, AI-generated text content	UK South (London)	Microsoft DPA	Active
Azure Communication Services	Microsoft Corporation	Email send (ACS)	Transactional emails (account creation, password reset, sign-in reminders); safeguarding escalation emails to school leads	User email addresses, names, account setup links, password reset tokens; safeguarding alert content and flagged message excerpts	United Kingdom	Microsoft DPA	Active
Azure Container Instances (Gotenberg)	Microsoft Corporation	Azure Container Instances running Gotenberg;8 document converter	Converting teacher-uploaded lesson materials (PPTX, PDF) into page images for in-platform display	Lesson material content (teacher-uploaded educational files)	UK South (London)	Microsoft DPA	Active
Azure AI Content Safety	Microsoft Corporation	Content Safety API	Automated moderation of student chat messages	Chat message text	UK South (London)	Microsoft DPA	Active

Sub-processor	Parent entity	Services used	Purpose	Data categories processed	Location	DPA	Status
			and AI responses for safeguarding categories				
Azure Logic Apps	Microsoft Corporation	Logic Apps workflow	Orchestrating safeguarding escalation flow triggered by high-severity flags	Safeguarding flag metadata, email content	UK South (London)	Microsoft DPA	Active
MongoDB Atlas	MongoDB, Inc.	Atlas M10 cluster (halved-prod-mongodb)	Primary document store for student accounts, lessons, assignments, and chat history	Student names, email addresses, accessibility flags, assignment work, chat conversation history, AI learning profiles	Azure UK South (London)	MongoDB DPA	Active
Cloud202 Ltd	Cloud202 Ltd	Infrastructure management, deployment, and Terraform state	Production infrastructure management and technical support	Administrative access to production systems holding student and teacher data	London, UK	Data processing agreement	Active (temporary)

## DPA References

Microsoft Products and Services Data Protection Addendum: [microsoft.com/licensing/docs](https://microsoft.com/licensing/docs) (covers all Azure services listed above under a single Microsoft DPA)

MongoDB Data Processing Agreement: [mongodb.com/legal/data-processing-agreement](https://mongodb.com/legal/data-processing-agreement)

## Notes

Azure AI Content Safety and Azure Logic Apps support the live safeguarding pipeline and are active sub-processors.

No sub-processors are located outside the United Kingdom.

This register covers the production environment (halved-prod-rg, Azure UK South). Development and demo environments process no real student data.

Halved does not use any sub-processor for analytics. Google Analytics and Microsoft Clarity have been removed from the platform.

Cloudflare provides DNS, CDN and security for the Halved marketing website (halved.io) only. It does not sit in front of the student-facing platform (my.halved.io) and processes no student or school personal data, so it is not a platform sub-processor. Confirmed June 2026 by response-header inspection (cf-ray present on halved.io, absent on my.halved.io).

**\*\*Review date: \*\*May 2027 (or earlier if sub-processors change) | [dataprivacy@halved.io](mailto:dataprivacy@halved.io)**

