

Cognitiv Pty Ltd (ACN 688 133 977, ABN 51 688 133 977), trading as Scorafy · scorafy.com · privacy@scorafy.com
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WHERE THE DATA LIVES

- **Storage.** Customer data is stored in one region, chosen per customer:
 - EU: Supabase on AWS, Dublin, Ireland (scorafy.com).
 - Australia: Supabase on AWS, Sydney, for Australian-residency customers (au.scorafy.com).
- **Application compute** runs on Vercel in the same region as storage (Dublin or Sydney).
- **Processing outside the storage region** is transient: in transit and in memory, with no storage. It covers:
 - AI inference by Anthropic (US)
 - transcription by Deepgram (US), only where a customer enables spoken answers
 - email by Resend (US)
- **Cognitiv.** Cognitiv Pty Ltd is an Australian company, and Australia does not have an EU adequacy decision. Operator access is from within the EEA; any access from outside the EEA is covered by the same controls. No customer data is stored in Australia except for Australian-residency customers.
- **Israeli-origin data.** Israel holds an EU adequacy decision, reaffirmed in the European Commission's January 2024 review. Israeli rules allow data to go to EEA countries, so the EU storage region is a permitted destination. Onward transfers to US sub-processors rely on the mechanisms below.

REGISTER

"DPF" means the EU-US Data Privacy Framework. Status was checked on the official list (dataprivacyframework.gov) on 27 September 2026. Where a provider is not listed, EU transfers rely on the EU Standard Contractual Clauses (2021/914), and on the UK Addendum for UK data, incorporated in that provider's DPA.

SUB-PROCESSOR	PURPOSE	CUSTOMER DATA	LOCATION	TRANSFER MECHANISM	TRAINING ON CUSTOMER DATA
Supabase (contracting entity Supabase Pte. Ltd.; infrastructure on AWS)	Database, authentication, file storage	All stored customer data	Dublin, Ireland (EU customers) or Sydney, Australia (AU customers)	SCCs (Module 2) and UK Addendum in the Supabase DPA	Not applicable (hosting)
Anthropic PBC	AI analysis of answers against the customer's rubric; report generation	Respondent name (or "Anonymous"), answers, transcripts, extracted upload text, rubric. Not respondent email	United States	SCCs and UK Addendum in the Anthropic DPA	No. Anthropic API inputs and outputs deleted within 30 days (longer only if flagged for a usage-policy review, up to 2 years, or if required by law), never used for training (Anthropic's Commercial Terms)
Vercel Inc.	Application hosting, serverless functions, edge delivery	Request data, transiently; request logs including IP address	Functions: Dublin, Ireland (EU) or Sydney, Australia (AU). Edge: global	DPF (active: EU-US, UK, Swiss) and SCCs	Not applicable

SUB-PROCESSOR	PURPOSE	CUSTOMER DATA	LOCATION	TRANSFER MECHANISM	TRAINING ON CUSTOMER DATA
Plus Five Five, Inc. (Resend)	Transactional email	Recipient name and email, notification content	United States	DPF (EU-US and UK; listed as "re-certification under review") and SCCs	Not applicable
GitHub, Inc.	Source code hosting, CI, private nightly backup artifacts (30 days)	Backup artifacts contain stored customer data	United States	DPF (active: EU-US, UK, Swiss) and SCCs	Not applicable
Deepgram, Inc.	Speech-to-text. Only used where a customer enables audio or video questions; an organisation can switch this off entirely	Audio of spoken answers	United States	SCCs, provided through Deepgram's DPA on request; only relevant to customers who enable spoken answers	Scorafy opts every request out of Deepgram's model-improvement programme. Opted-out audio is kept only as long as needed to process the request
Stripe (Stripe Payments Europe, Limited; Stripe, LLC)	Subscription billing	Billing contact and payment data (card customers only)	United States / Ireland / Australia	DPF (Stripe, LLC, active) and Stripe's Data Transfer Addendum	Not applicable
Google LLC (Google Analytics 4)	Marketing-site analytics, after cookie consent	Marketing-page visitors only. Never assessment, response or report data	United States	Google's data processing terms	Not applicable

Not in use.

- OpenAI and Google AI: no other AI provider is in the assessment pipeline.
- EU-region AI inference is not in use. Any new AI provider or region would be added to this register, with notice, before use.

CHANGES TO THIS REGISTER

- **Notice.** Cognitiv gives customers at least 30 days' notice before adding or replacing a sub-processor that processes customer personal data. Notice goes by email to the customer's nominated contact. A change of AI provider or AI inference region counts as a sub-processor change.
- **Objection.** Customers may object on reasonable data-protection grounds. If Cognitiv cannot offer an alternative, the customer may terminate the affected service and receive a pro-rata refund of prepaid unused fees.
- **Review.** Each sub-processor's DPA and security attestations are reviewed annually and before any change.