

**Issued by:** RegAlign Limited (Jersey company no. 165263, registered office 9 Bond Street, St. Helier, JE2 3NP). **Trade mark:** RegAlign® is a registered UK trade mark, UK00004283882, owned by Sabrina Stewart and licensed to RegAlign Limited. RegAlign Limited intends to sub-license the mark, platform and methodology to RegAlign UK Limited under an intra-group licence (DRAFT — pending counsel review). The full IP licence chain is published at <https://regalign.app/legal>. **Data protection:** RegAlign Limited is registered with the Jersey Office of the Information Commissioner as a controller and processor under the Data Protection Authority (Jersey) Law 2018 (DPAJL), Registry No. 103914. **Status:** Canonical. Issued to prospects and customers under NDA as part of the Pilot Pack. Refreshed when a sub-processor is added, removed or materially changed. **Owner:** Sabrina Stewart. **Version date:** Current pilot pack release. Supersedes any earlier list.

## Purpose

This list identifies every third party that processes Customer Personal Data on RegAlign's behalf. Customers are entitled to material-change notice before a new sub-processor is engaged for their data.

## Active sub-processors

#	Sub-processor	Role	Region	Data accessed	Safeguards
1	Supabase (Postgres, Auth, Storage)	Primary data layer and authentication, operated via Lovable Cloud	EU (Ireland)	All tenant data at rest; auth identifiers	RLS-enforced tenant isolation; AES-256 at rest; TLS 1.3 in transit; DPA in place
2	Cloudflare	Edge, CDN, request routing	Global edge (EU origin)	Request metadata; no payload retention beyond routing	DPA in place; SCCs for cross-border transfers
3	Lovable Cloud	Application runtime / hosting	EU / UK	Application runtime memory; no persistent customer data	DPA in place
4	Email delivery (transactional)	System notifications and digests	EU	Recipient email, subject, message body	DPA in place; opt-out and suppression honoured
5	Source-code escrow agent	Custodian of escrowed source code	UK / Jersey	None — code only, no customer data	Tripartite escrow agreement; release triggers in BCP

## Notification policy

- **New sub-processor:** 30 days' written notice to active pilot and production customers before the new sub-processor begins processing Customer Personal Data.
- **Removal of a sub-processor:** notified at the next quarterly review or immediately if service-impacting.

- **Customer right to object:** a customer may object in writing within 14 days of notice. If RegAlign cannot accommodate the objection, the customer may terminate the affected service for convenience without penalty.

## What is NOT a sub-processor

The following are tools used by RegAlign internally that do not process Customer Personal Data and are therefore not listed above: developer IDEs, internal analytics on RegAlign's own marketing site, accounting software, contract management tools, and continuous security scanners (Aikido — SAST, secrets, IaC and dependency scanning at workspace level; code only, no customer data). Internal notifications to the founder when a third party requests platform access (via the public `/request-access` form) are RegAlign's own administrative correspondence and do not constitute processing of Customer Personal Data.

## Verification

Customers may request, under NDA: a copy of each named sub-processor's DPA, the SCC version in force, the most recent independent assurance report (where applicable), and confirmation of EU/UK residency for their tenant.