Subprocessor List

Version	001

1st Planner Ltd
18 Brunswood Road, Matlock Bath, Matlock, England, DE4 3PA
Reg: 07799768
enquiries@1stplanner.com

1. Purpose

1ST PLANNER LTD uses carefully selected third-party providers to support delivery, operation, security and maintenance of the Optimise platform and associated services.

This page identifies the primary providers that may process personal information or limited technical data in connection with the services.

1ST PLANNER LTD does not sell personal information or share personal information for advertising, marketing profiling or behavioural advertising purposes.

Subprocessors are not authorised to use client data for independent advertising, profiling or marketing purposes except where acting independently under their own services and terms outside the scope of the Optimise platform.

2. Primary Subprocessors

Provider	**Service Area**	**Typical Processing Purpose**	**Typical Data Categories**	**Primary Hosting/Processing Region***
Microsoft Corporation	Microsoft Azure (hosting/infrastructure)	Application hosting, platform operations, resilience, security	Account data, technical logs, uploaded content metadata, operational data	UK and/or EEA (subject to service configuration)
Microsoft Corporation	Microsoft Entra ID (Azure AD) authentication	User authentication, identity and access management	Name, work email, tenant/account identifiers, sign-in metadata	UK and/or EEA (subject to service configuration)
Microsoft Corporation	Azure Database for PostgreSQL	Core application data storage and retrieval	User/account records, permissions, platform records, uploaded data references	UK and/or EEA (subject to service configuration)

Microsoft Corporation	Azure Blob Storage	File/object storage for platform uploads and generated artefacts	Uploaded files and related metadata	UK and/or EEA (subject to service configuration)
Microsoft Corporation	Azure Application Insights / monitoring services	Performance monitoring, diagnostics, incident investigation, reliability	Telemetry, IP/device/browser/session metadata, error and performance logs	UK and/or EEA (subject to service configuration)
monday.com Ltd	Support and operational workflow management	Support ticket management, onboarding workflows and internal operational processes	Support requests, contact details, ticket metadata and communications	EEA and/or other regions subject to provider configuration
CloudConvert GmbH	Document/CAD conversion processing	Technical conversion of supported uploaded files	Uploaded source file and conversion outputs during processing window	EEA and/or other regions per provider controls

* Final processing location can vary based on deployed environment, customer tenancy settings, provider operational architecture and applicable resilience or support arrangements.

Certain providers may operate global support, resilience or operational infrastructure subject to applicable transfer safeguards and provider contractual commitments.

Access to client information by subprocessors is intended to be limited to what is reasonably necessary for the relevant operational purpose.

Equivalent infrastructure, monitoring or operational providers may be introduced from time to time where reasonably necessary to support service delivery, security or operational resilience.

3. Infrastructure and Identity Providers

The services above support:

- authentication and access control;

- hosted runtime and database operation;
- secure object and file storage;
- diagnostics and incident response;
- business continuity and disaster recovery operations.

4. External Data Sources and Public APIs

Optimise may access publicly available external data services to support geospatial and educational functionality.

Such sources may include:

- mapping basemaps and geospatial overlays;
- public planning or education-related datasets;
- external reference services used by specific platform workflows;
- geospatial search or address lookup services;
- mapping tile and visualisation services.

Requests to public mapping, geospatial or reference services may involve limited technical metadata such as:

- IP address information;
- browser metadata;
- query parameters;
- or location-related request information

as part of normal internet communications.

1ST PLANNER LTD does not control:

- third-party public data source availability;
- content quality;
- independent privacy practices;
- or external service operational availability.

5. Educational and Pupil-Related Data Position

Where client organisations upload educational or pupil-related information:

- the client organisation remains responsible for lawful processing;
- 1ST PLANNER LTD acts as Data Processor where processing is carried out on behalf of the client;
- uploaded information should be anonymised or pseudonymised wherever reasonably possible;

- directly identifiable pupil information should be minimised unless operationally necessary and appropriately authorised.

The platform is not intended for routine processing of:

- safeguarding records;
- child protection records;
- detailed medical records;
- unnecessary special category personal data

unless expressly agreed in writing and supported by appropriate legal safeguards.

6. CloudConvert Processing Restrictions

CloudConvert is used solely for technical file conversion functionality in supported workflows.

Processing expectations include:

- uploaded files are processed only for the duration reasonably necessary to complete conversion;
- 1ST PLANNER LTD does not intentionally configure CloudConvert for persistent storage of uploaded files following successful conversion workflows;
- 1ST PLANNER LTD does not intentionally use CloudConvert for long-term storage of customer datasets;

client organisations remain responsible for ensuring uploaded files do not contain unnecessary personal or safeguarding-sensitive data.

7. International Transfers

Some providers may process personal information outside the United Kingdom or EEA.

Where applicable, transfers are managed using lawful mechanisms such as:

- adequacy regulations;
- International Data Transfer Agreements (IDTAs);
- standard contractual clauses;

or equivalent approved safeguards.

8. Data Minimisation and Security

1ST PLANNER LTD configures third-party services to limit data sharing to what is reasonably necessary for service delivery.

We do not intentionally share:

- safeguarding records;

- child protection records;
- detailed medical records;
- unnecessary special category personal data

with subprocessors unless operationally necessary, contractually authorised and legally permitted.

Security and assurance controls include:

- Cyber Essentials Plus;
- ISO/IEC 27001;
- ISO 9001;
- encryption in transit;
- role-based access controls;
- monitoring and logging;
- backup and recovery procedures.

9. Updates to This List

We may update this Subprocessor List as providers, operational requirements or technical architecture change.

1ST PLANNER LTD will use reasonable efforts to notify clients of material subprocessor changes where appropriate.

Material updates will also be reflected in related privacy and contractual documentation.