Sub-Processor Register

Kanriva™ and FlowCrew™

Version 1.0 · 29 June 2026 · Kaizen Kanri (KVK 42049431)

1. Purpose

This register lists every third party that processes personal data on behalf of Kaizen Kanri in the delivery of the Kanriva™ platform and the FlowCrew™ worker app. It is referenced as Annex III of the Data Processing Agreement and is maintained as a living document, so that a customer can always see who touches their data.

Each sub-processor is engaged under a written data processing agreement with obligations no less protective than those Kaizen Kanri owes its customers. Kaizen Kanri remains fully liable for their performance.

2. Current sub-processors

Sub-processor	Role in the service	Personal data processed	Location	Transfer basis
Strato AG (Germany)	Hosting of the application, the database and uploaded files	All platform data, including workforce personal data	Germany, European Union	Not applicable — processing within the EU
Emergent Labs	Managed deployment platform and object storage for files uploaded by users	Platform data; uploaded documents and images	EU region; the current storage location is confirmed in writing on request	Standard Contractual Clauses where any processing occurs outside the EU
Stripe	Subscription payments, invoicing and payment-method handling	Billing contact details and payment data of the customer's administrators. **No workforce personal data.**	EU / United States	Standard Contractual Clauses
Resend	Transactional email: invitations, account notifications, deletion confirmations, system notices	Recipient email address and the content of the message sent	EU / United States	Standard Contractual Clauses

No other third party receives personal data. In particular:

- **No artificial intelligence or large-language-model provider** processes customer data. The staffing recommendation engine is deterministic and runs on Kaizen Kanri's own infrastructure.
- **No analytics, advertising or tracking provider** is embedded in the application.
- **No data broker, reseller or marketing partner** receives customer data in any form.

3. What each sub-processor can and cannot see

Strato AG hosts the infrastructure. As a hosting provider it has, by nature, the technical ability to access stored data, and is contractually bound not to. Data at rest is encrypted.

Emergent Labs provides the managed platform on which the application is deployed and the object storage used for user-uploaded files such as certificates and damage photographs. It does not receive database exports and does not process workforce data for its own purposes.

Stripe receives only what is needed to charge a subscription: the administrator's name, email, company and payment method, plus invoice amounts. It never receives employee names, schedules, presence data or

personnel records.

Resend receives the recipient address and the body of platform emails — for example an invitation to activate a FlowCrew™ account, or the confirmation of an account deletion. It does not receive database content beyond what appears in the message itself.

4. Changes to this register

1. Kaizen Kanri notifies customers **in writing at least thirty (30) days in advance** before adding or replacing a sub-processor that processes workforce personal data.
2. A customer may object on reasonable data protection grounds within that period. If the objection cannot be resolved, the customer may terminate the affected part of the subscription without penalty.
3. Changes to sub-processors that process **no** workforce personal data — for example a change of payment provider — are notified without the thirty-day waiting period, but are recorded here.
4. Every version of this register is dated. The version in force at the date of signature is attached to the Data Processing Agreement.

5. Subscribe to change notifications

To receive notifications automatically, send a request to info@kaizenkanri.nl stating the customer name and the address that should receive them. Confirmation is sent in writing.

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