

lumi — Sub-processor List

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This page lists the sub-processors lumi engages to deliver the service.

How to read this list

A sub-processor is a third party that processes data on lumi's behalf (for example, hosting, email delivery, or AI-generated analysis). lumi remains accountable for any sub-processor's handling of data under the Data Sharing Agreement (DPA).

Current sub-processors

Purpose	Sub-processor	Location & transfer	Safeguards
AI-generated analytical summaries (AI Insights)	Anthropic PBC	United States — UK GDPR transfer safeguards (SCCs / UK Addendum)	Data-processing agreement; processes only aggregated/derived figures (no individual salaries); no training on inputs; zero/limited retention under commercial API terms
Application hosting	Amazon Web Services (AWS)	United Kingdom / EEA region	Data-processing agreement (AWS DPA)
Transactional email	Postmark (Wildbit LLC, an ActiveCampaign company)	United States — UK GDPR transfer safeguards (SCCs / UK Addendum)	Data-processing agreement (Postmark DPA)

Changes

Members who have accepted the DPA will be notified of additions to this list in line with the DPA's change-notification terms.

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