

# Sub-processors

Last updated 10 October 2026

Wiretouch Ltd (trading as FacePing) uses the sub-processors below to provide the FacePing service. This list forms Annex C of our [Data Processing Agreement](#).

**Only Microsoft Azure ever stores face templates, and only in the data region you choose.** No other sub-processor stores face templates or photos.

## 1. Current sub-processors

| Sub-processor                                      | Purpose                                                                                         | Data                                                                                                                                                                                 | Location                                                                  | Transfer safeguard                                                                                                |
|----------------------------------------------------|-------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|
| Microsoft Azure (Microsoft Ireland Operations Ltd) | API hosting and database                                                                        | Face templates, the customer's IDs for enrolled people, consent records, customer account data                                                                                       | Your chosen region: EU (North Europe, Ireland) today; UK or US on request | None needed: data stays in your chosen region                                                                     |
| Cloudflare, Inc.                                   | Content delivery, DNS, network security and website hosting; single sign-on for our staff tools | Traffic to and from our websites, the API and check-in devices, in transit only (including photos sent for enrolment and encrypted face packs); connection data such as IP addresses | Global network                                                            | UK International Data Transfer Addendum and EU Standard Contractual Clauses (Cloudflare data processing addendum) |
| Twilio Inc. (SendGrid)                             | Sending service emails, such as sign-in links and account, application and billing notices      | Customer staff names and email addresses, and email content                                                                                                                          | United States                                                             | UK International Data Transfer Addendum and EU Standard Contractual Clauses (Twilio data protection addendum)     |
| Stripe Payments Europe Ltd                         | Subscriptions, invoices, tax and payments                                                       | Customer company and billing contact details, payment card details (held by Stripe, never by FacePing), monthly counts of people stored                                              | EU and United States                                                      | UK International Data Transfer Addendum and EU Standard Contractual Clauses (Stripe data                          |

| Sub-processor                         | Purpose             | Data                                         | Location             | Transfer safeguard                                                                                                  |
|---------------------------------------|---------------------|----------------------------------------------|----------------------|---------------------------------------------------------------------------------------------------------------------|
|                                       |                     |                                              |                      | processing agreement)                                                                                               |
| Google Ireland Ltd (Google Workspace) | Our support mailbox | Correspondence with customers and applicants | EU and United States | UK International Data Transfer Addendum and EU Standard Contractual Clauses (Google Cloud data processing addendum) |

## 2. What never leaves your region

1. Face templates and consent records are stored only in Microsoft Azure in your chosen region. They are not copied to another region.
2. Cloudflare carries traffic between people's browsers, your check-in devices and our API. It does not store face templates or photos, and all traffic is encrypted with TLS.
3. The counts of people we send to Stripe for billing are numbers only. They never include face data or the IDs of enrolled people.
4. Twilio SendGrid, Stripe and Google never receive face templates, photos or the IDs of enrolled people.
5. Copies of face templates on your check-in devices are encrypted and stay wherever you use those devices.

## 3. How we tell you about changes

1. We will email the owner of your FacePing account at least 30 days before a new or replacement sub-processor starts processing your personal data, and update this page at the same time.
2. If you have a reasonable data protection objection, email [support@faceping.ai](mailto:support@faceping.ai) within those 30 days, giving your reasons. We will work with you to resolve it. If we can't, you may end the affected service before the change takes effect, as set out in clause 10 of the Data Processing Agreement.
3. If we must make a change urgently to keep the service secure or available, or to comply with the law, we will tell you as soon as we can, and your right to object still applies.

## 4. Contact

Questions about our sub-processors: [support@faceping.ai](mailto:support@faceping.ai), or Wiretouch Ltd, 71 Church Road, Hove, BN3 2BB, United Kingdom.