Subprocessors

This page is referenced from the KeenFace API and Studio Privacy Policy and Terms of Service. It lists the third parties KeenTools uses to process personal data and is kept up to date independently of those documents. Before adding or replacing a sub-processor that processes personal data on a Customer's behalf, KeenTools updates this list and notifies affected Customers by email or through the Service, giving them a reasonable opportunity to object on data-protection grounds before the change takes effect, as described in Section 5.6 of the Terms of Service. Any separate Data Processing Agreement governs notices and objections for the processing it covers. This list is provided for information; it is not a separate request for consent.

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Used by KeenFace API and Studio

- **Cloudflare (R2, Pages, Workers, Images, Turnstile)** — Hosting, storage, content delivery, anti-bot protection. Data: uploaded photographs, generated 3D models (meshes/textures), IP address, general traffic data. Location: European Union (R2 storage, Western Europe); global edge network. Access to affected files on subsequent requests reaching KeenTools' delivery service is revoked when a head or account is deleted; KeenTools CDN cache copies are purged within 24 hours. Private-file responses permit reuse in a private browser cache for up to seven days without revalidation; this does not guarantee physical deletion from a device after seven days. Previously downloaded or device-cached copies are outside this process.
- **Clerk** — Authentication, identity management and phone verification where requested. Data: name, email address, authentication credentials and phone number where supplied. Location: United States.
- **Convex** — Backend database. Data: account information, session data, Clerk user ID, credit ledger and image-assessment results. Image-assessment cache entries are deleted within 30 days of assessment; ordinary head deletion does not automatically remove them or restart that period. Applicable rights to erasure remain unaffected; request handling and backup retention are described in the Privacy Policy. Location: United States (hosted on AWS).
- **Amazon Web Services** — 3D head reconstruction (AWS Lambda) and encrypted daily backups (Amazon S3). Data: uploaded photographs, generated 3D models, account and usage data from our database. Location: United States / European Union.
- **GitHub** — Automated backup jobs (GitHub Actions); backups pass through its runners in transit. Data: database backup contents. Location: United States.
- **Retool** — Internal admin panel. Data: user ID, name, email address, transaction records. Location: United States.

- **fal.ai (Features & Labels, Inc.)** — AI processing gateway for content screening, reference-image generation and quality checks of generated images. Routes include fal → OpenRouter → Google and fal → OpenAI. Data: resized/recompressed input photographs, generated reference images or panels, prompts, assessment results and request metadata. Choosing Scan Reconstruction ON before upload avoids these image-processing routes; changing it afterwards does not undo prior transfers. Location: United States and other countries used by downstream providers; no EU-only processing commitment is made for these routes. Controls: request-history content storage disabled; temporary fal CDN files expire within 24 hours of creation and require authorized access or a time-limited signed link. Only approved model routes covered by contractual content-use restrictions are used, with automatic fallback disabled. These controls do not determine downstream providers' internal log or record retention.
- **OpenAI** — Reference-image generation accessed through fal. Data: high-quality copies of uploaded photographs, generation instructions and resulting reference images; inputs may be resized or recompressed. Used in the image-processing workflow described above. Location: United States and other locations under the provider's processing arrangements.
- **Google (Gemini)** — Content screening and quality checks through fal and OpenRouter; image generation where a Google model is selected. Data: downsized input photographs, generated images or panels, prompts and assessment results. Google is also used through PostHog for AI-assisted analysis of selected session recordings, which may include recording-derived page content, activity, account details and generated summaries. The PostHog route is separate from Scan Reconstruction. Location: United States and other locations under the relevant provider's processing arrangements.
- **OpenRouter** — Intermediary between fal and downstream models, including Google, for image screening and quality checks. Engaged through fal rather than a direct KeenTools API integration. Data: images or panels, prompts, model responses and request metadata. Location: United States and other countries used by downstream providers.
- **PostHog** — Product analytics, session recordings and AI-assisted session analysis. Data: usage events, account identifiers, IP address, technical measurements and diagnostic text; with optional analytics, profiles and recordings may include name, email address and page activity. Typed input is configured to be masked. Selected recording-derived data may be processed by Google's models to generate summaries. Location: United States; downstream AI processing as described above.
- **Sentry** — Error tracking and diagnostic session recordings. Data: account identifier, technical errors and diagnostic context; email and IP fields are filtered by the integration, and replay text/media are configured to be masked. Location: Germany for the configured ingestion endpoint; this does not establish the location of every support or downstream processing operation.
- **HubSpot** — CRM — contact sales, onboarding, registration sync. Data: name, email address, company information. Location: United States.
- **Mailchimp** (Intuit) — Email marketing. Data: email address, name, company information. Location: United States.

- **Paddle** — Billing, Merchant of Record (independent controller for payment data). Data: name, payment data, billing address. Location: United States / European Union.
- **Tolt** — Affiliate referral attribution and commission administration. Data: referral and browser identifiers, referral activity and associated purchase/conversion data; customer details may be received through the billing integration. Browser tracking follows the optional analytics setting. Location: United States and European countries under Tolt's processing arrangements.
- **Google Workspace (Gmail)** — Support and administrative email. Data: email address, message content. Location: United States.
- **Freshdesk** — Support email management. Data: email address, support ticket content. Location: United States.

For international transfers of personal data from the EEA, UK, or Switzerland, KeenTools relies on the transfer mechanisms made available by each processor (including, where applicable, the EU-U.S. Data Privacy Framework or Standard Contractual Clauses).

Questions about this list can be directed to privacy@keentools.io