

Encephlo — Subprocessor List

Effective date: September 18, 2026 **Owner:** Suraj Swaminathan, Founder — Suraj@encephlo.com **Scope:** Subprocessors that may process institutional Customer Data under the Encephlo Educator Pilot.

A "subprocessor" is a third-party service Encephlo uses to deliver the service that may, as part of providing its function, process Customer Data. This list reflects the **production subprocessors that are actually invoked on the B2B Educator Pilot data path**, derived from the source code (see `security-and-data-flow.md` §10 and §13).

We commit to providing 30 days' written notice before adding a new subprocessor that materially changes how Customer Data is processed.

Active Subprocessors (in scope for the pilot)

1. Google LLC

Item	Detail
Legal entity	Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA
Services used	Firebase Authentication, Cloud Firestore, Cloud Functions for Firebase (v2), Firebase Storage, Firebase App Hosting, Cloud Logging, Vertex AI (Gemini API), AI Studio Gemini API (transitional, embeddings only — see §13 of the data-flow doc)
Data processed	All Customer Data — see <code>security-and-data-flow.md</code> §3
Data location	Firestore: <code>nam5</code> (US multi-region: Iowa + South Carolina). Cloud Storage: US multi-region. Cloud Functions: <code>us-central1</code> . App Hosting: <code>us-central1</code> . Vertex AI inference: <code>global</code> endpoint (model availability constraint — disclosed in §4 / §5 of the data-flow doc).
DPA / contractual basis	Google's Cloud Data Processing Addendum (CDPA) and Vertex AI service-specific terms . Per the CDPA + Vertex AI terms, Google does not use Customer Data submitted to Vertex AI to train its foundation models.
Privacy policy	https://policies.google.com/privacy

2. Instructure Inc. (Canvas LMS)

Item	Detail
Legal entity	Instructure, Inc., 6330 South 3000 East, Salt Lake City, UT 84121, USA
Services used	Canvas LMS API (read-only) for course metadata, assignments, announcements, and file pulls.
Data processed	Course content (syllabus, assignment text, announcements), file attachments, course roster metadata that the educator chooses to sync. Encephlo only reads what the educator's Canvas access token permits.
Data location	Customer's own Canvas instance (the institution's tenant). Data flows from the institution's Canvas to Encephlo's Cloud Functions in us-central1, then to Firestore (nam5) / Cloud Storage.
Authentication	Canvas OAuth 2.0 (preferred; requires the institution to approve Encephlo's developer key) or Personal Access Token (PAT) provided by the educator (pre-pilot fallback). Tokens stored server-side only at educators/{uid}/integrations/canvas (deny-all client rules).
Note	Instructure is the customer's integration source, not a vendor Encephlo procured. Encephlo's role is limited to consuming what the educator authorizes.
Privacy policy	https://www.instructure.com/policies/privacy

3. Microsoft Corporation (Identity Platform)

Item	Detail
Legal entity	Microsoft Corporation, One Microsoft Way, Redmond, WA 98052, USA
Services used	Microsoft Identity Platform (OIDC) — invoked only if a user chooses "Sign in with Microsoft" at login.
Data processed	OIDC ID-token claims: name, email, Microsoft tenant ID, OID.
Data location	Microsoft global; account record persisted by Firebase Auth.

DPA	Microsoft Online Services DPA
Privacy policy	https://privacy.microsoft.com/privacystatement

4. Apple Inc. (Sign in with Apple)

Item	Detail
Legal entity	Apple Inc., One Apple Park Way, Cupertino, CA 95014, USA
Services used	Sign in with Apple (OIDC) — invoked only if a user chooses "Sign in with Apple" at login.
Data processed	OIDC ID-token claims: name (first sign-in only), email or Apple private relay email, Apple sub identifier.
Data location	Apple global; account record persisted by Firebase Auth. Encephlo never sees the user's Apple ID password or device identifiers.
DPA / contractual basis	Apple's Sign in with Apple terms and Apple Developer Program License Agreement , which govern Apple's role as an identity provider.
Privacy policy	https://www.apple.com/legal/privacy/
Note	Sign in with Apple is offered on the Encephlo web sign-in page alongside Google, Microsoft, and email/password. Educators or students who decline to use Apple's identity provider are not required to do so; this subprocessor is invoked only when a user explicitly clicks "Continue with Apple."

5. Inworld AI (text-to-speech, read-aloud accessibility feature)

Item	Detail
Legal entity	Theai, Inc. d/b/a Inworld AI, Mountain View, CA, USA
Services used	Streaming text-to-speech (<code>api.inworld.ai/tts/v1/voice:stream</code>), invoked by Encephlo's server-side <code>/api/tts</code> route to power the in-app read-aloud feature.

Data processed	The text of the tutor message (or the passage a user selected) that the user asked to have read aloud. Because tutor responses are grounded in the educator's course materials, that text can contain course content. No student name, email, UID, or account identifier is sent with the request. No audio is stored by Encephlo.
When invoked	Only on explicit user action — a signed-in user clicks the speaker control or selects text and chooses read-aloud. It never runs automatically, and a user who never presses play never reaches this subprocessor.
Data location	United States.
DPA / contractual basis	Inworld AI Terms of Service and Privacy Policy .
Note	Added August 2026 with the read-aloud accessibility feature. An institution that prefers not to use a TTS subprocessor at all can have the feature disabled for its courses; ask during pilot setup.

Subprocessors NOT used in the Pilot (explicitly out of scope)

6. Resend (transactional email)

Item	Detail
Legal entity	Plus Five Five, Inc. d/b/a Resend, San Francisco, CA, USA
Services used	Delivery of the weekly educator digest sent from <code>updates@encephlo.com</code> (<code>functions/src/b2b/weekly-educator-digest.ts</code>).
Data processed	The educator's email address and first name, and the digest body: their class summary, top topics, class sticking points, and aggregate counts (active students, enrolled students, message totals). No student names, student emails, or chat transcripts are placed in the digest. Students never receive mail via Resend.
Data location	United States.
DPA / contractual basis	Resend DPA and Privacy Policy .

Note

An educator can stop the digest by replying to it.

Subprocessors NOT used in the Pilot (explicitly out of scope)

These exist in the broader Encephlo platform but are **not invoked on the institutional Educator Pilot data path**. They are listed here so the customer can verify the negative.

Service	Status for pilot	Why it's not in scope
Stripe (payments)	Not used	Stripe handles D2C consumer billing only. Classroom students and their instructors never pay, so no pilot user reaches Stripe.
Google Custom Search API	Not used on B2B	Invoked only by the D2C web app's <code>searchTheWeb</code> tool — not registered in the B2B <code>personalized LearningStream</code> Cloud Function.
YouTube Data API	Not used on B2B	Invoked only by the D2C <code>find-youtube-resource</code> flow — not registered in the B2B path.
ElevenLabs	Removed	Deprecated and removed from <code>app hosting.yaml</code> . No live code path.
Apple iCloud / Mac App Store / iPad App Store	Not used	The macOS / iPadOS apps are archived and not in production.
Chrome Web Store	Not used	The Chrome extension is not deployed for institutional pilots.

Change Notification

Encephlo will notify the institution in writing (email to the contracted security contact, with at least 30 days' notice) before:

1. Adding any new subprocessor that processes the institution's Customer Data, or
2. Materially changing the region or processing purpose of an existing subprocessor.

The institution may object to a new subprocessor in good faith on documented privacy or security grounds, in which case the parties will work in good faith to identify a mutually acceptable alternative or, if no alternative is feasible, either party may terminate the affected service per the pilot agreement.

Maintained by Encephlo. Material updates will be reflected here within 30 days of effective date.