

Data processors — the single named list

Active processors

PROCESSOR	PURPOSE	WHAT IT RECEIVES	USER CONTROL
Anthropic (Claude)	AI features — plan insights, the AI assistant, the Companion ask-line, and expense categorization	The household's plan data with PII removed — see pii-classification.md . Includes year-by-year projections, account balances and types, income and expense figures, and any question the household types.	Opt-in. Nothing is sent until consent is granted; withdrawable at any time in Settings.
Stripe	Payments and subscription billing	Name, email, and payment details, collected by Stripe directly. RetiFlo stores only the customer and subscription identifiers, never card details.	Required to hold a paid subscription.
Resend	Transactional and notification email	Email address and the message content — which may include plan figures where the notification is about them (e.g. a Roth conversion year-end reminder).	Notification preferences and one-click unsubscribe in Settings.
Hetzner	Hosting — the servers running the application and its database, located in Ashburn, Virginia, United States	Everything you enter , as it is held by the running service. The servers use full-disk encryption, and sensitive fields are separately encrypted by RetiFlo before they are written. Hetzner does not process your data for any purpose of its own; it provides the machines.	Inherent to using the service.

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Cloudflare (R2 object storage)	Storing documents a household or their advisor uploads, and generated PDF reports	Encrypted objects only. Documents are encrypted by RetiFlo before they are stored, and the key is never sent with them — Cloudflare holds ciphertext it cannot read. File names, sizes and content types are held as object metadata. Objects are stored in the western United States .	Documents are optional; the household chooses what to upload, and deleting a document destroys the key that makes it readable.

Storage location, since §12 of the privacy policy turns on it. Documents are held in the western United States, and the application and database are in Ashburn, Virginia.

Everything stays in the United States — a document never leaves the country holding the database that describes it, so this processor adds no new international transfer.

One thing this row deliberately does not claim. It does not say Cloudflare "cannot access your documents" in the absolute. They hold ciphertext and not the key, which is true and is the point — but a full compromise of RetiFlo's own environment would expose the key that unlocks it, and the row should not imply otherwise.

***Hetzner was added to the active list above on 2026-08-29 — an oversight, corrected on the owner's instruction.** It was surfaced by this proposal rather than by the vault itself: naming Cloudflare for holding encrypted objects made it untenable to leave unnamed the host holding the plaintext database. **That row is live and is not part of this proposal** — it stands whether or not the vault is approved.*

The general question it raises is still open with counsel (`questions-for-lawyers.md` § 19): what is the rule for what counts as a processor we must name — does it extend to a backup destination, or a CDN? A stated rule is more useful than a per-vendor answer, and would have caught this one.

The four AI features, spelled out

Naming "Anthropic" once is not enough on its own, because the number of features behind that name has grown and the documents did not keep up. All four send to the same processor under the same consent:

FEATURE	SENDS
Plan insights (<code>planComment.generateAiInsight</code>)	Section-level plan data for the page being commented on
AI assistant (<code>/api/assistant/stream</code>)	Plan data reachable by its projection tools, including detailed figures
The Companion (<code>companion.ask</code>)	Year-by-year projection (income, expenses, taxes, portfolio, withdrawal rate) and the question the household typed
Expense categorization	Transaction descriptions and merchant text from an imported statement

All four route through one gateway, which applies PII redaction on the way out and rehydration on the way back. There is automation in place that fails the change process and halts it if any code constructs its own vendor client outside that gateway.

Not currently active

Recording these matters as much as the active list: a processor that is switched back on without a policy update is the failure this registry exists to prevent.

PROCESSOR	STATUS
Plaid (account aggregation)	Disabled. The npm dependency is removed and <code>plaidClient.ts</code> is a stub; no account is linked and no data is sent. Re-enabling it requires updating this file, <code>pii-classification.md</code>, and the privacy policy in the same change — it would introduce a new category of data (institution credentials and transaction history) that the current policy does not describe.
Cloudflare (R2 object storage)	Planned, not yet receiving data. The account and buckets exist; the document vault that would use them is designed and not built (<code>plans/document-vault.md</code>). Nothing is sent to Cloudflare today. Named here in advance rather than on the day it goes live, because this file's rule is that a processor is recorded <i>before</i> it receives data, and the "not currently active" state is the honest way to do that. When the vault ships, the row below moves into the Active table above — the row is already written there under the proposal banner, so shipping is a move, not a drafting exercise.

Adding or removing a processor

1. Edit this file — it is the source, and the only place the list is written out.
2. If the change alters *what data leaves the app*, update `pii-classification.md` and the privacy policy's scope sentence.
3. Check that the referring documents still only **link** here rather than restating:
`apps/web/src/app/(marketing)/privacy/page.tsx` ,
`apps/web/src/app/(marketing)/terms/page.tsx` , `docs/policies/privacy-policy.md` , `docs/policies/terms-of-service.md` ,
`apps/web/src/components/ui/AiConsentModal.tsx` ,
`apps/web/src/content/help/overview/data-privacy.mdx` .
4. Re-run `npm run generate:assistant-help` if help content changed, or the in-app assistant will keep answering privacy questions from the old text.

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