



Fraudfinder LTD  
71-75 Shelton St  
London  
WC2H 9JQ  
United Kingdom

Email: alexander@fraudfinderai.com

**TRA 2025**

# Fraudfinder Ltd - Transfer Risk Assessment (TRA)

**Version:** 1.0

**Last Review:** 1 May 2025

**Approved by:** CEO

**Review Cycle:** Annual

---

## 1. Purpose

This Transfer Risk Assessment (TRA) evaluates cross-border transfers of personal data by Fraudfinder Ltd to subprocessors located outside the UK and EEA, in accordance with the UK GDPR, the Data Protection Act 2018, and the UK International Data Transfer Addendum (IDTA) to the EU Standard Contractual Clauses (SCCs).

Fraudfinder's data processing operations are primarily hosted and managed within the **UK and the EEA (Ireland, Netherlands)**. The **only non-EEA vendors** used are **OpenAI, L.L.C.** and **SendGrid/Twilio, Inc.**, both based in the **United States**.

- **OpenAI** is used solely to power the *optional live LLM chat* within the Fraudfinder Portal UX. This feature can be disabled at client request.
- **SendGrid/Twilio** is used exclusively for sending *automated transactional emails* (Forgot Password and Magic Link authentication).

---

## 2. Scope

| Vendor / Subprocessor | Country of Processing | Data Transferred  | Legal Safeguard                         | Notes   |
|-----------------------|-----------------------|---|---|---|
| OpenAI, L.L.C.        | United States         | Pseudonymised text metadata (no personal identifiers, no document images or sensitive data) | UK IDTA (attached to DPA) + SCCs (2021) | Used for AI-based text validation. Data is minimised, pseudonymised, and transmitted over encrypted API (TLS 1.2+). |

|                                |               |   |                       |  |
|--------------------------------|---------------|---|-----------------------|--|
| <b>SendGrid / Twilio, Inc.</b> | United States | User email address (for password reset or magic link emails only) | UK IDTA + SCCs (2021) | Used solely for automated transactional emails. No message content or attachments stored beyond delivery logs. TLS enforced. |
|--------------------------------|---------------|---|-----------------------|--|

---

### 3. Risk Assessment Summary

| <b>Criteria</b>                  | <b>Assessment</b>  |
|----------------------------------|--|
| <b>Data Type</b>                 | Minimal: chat text (no PII) and user email addresses only. No financial or sensitive category data transferred.          |
| <b>Purpose</b>                   | Optional chat assistance and secure login communication.   |
| <b>Frequency</b>                 | Infrequent, user-initiated, and system-automated.  |
| <b>Legal Safeguards</b>          | UK IDTA and SCCs (2021) signed with both subprocessors.  |
| <b>Technical Safeguards</b>      | TLS 1.2+ encryption in transit, AES-256 at rest, strict access controls, and SOC 2 / ISO 27001 certifications.           |
| <b>Organisational Safeguards</b> | Vendor due diligence completed; both subprocessors contractually bound to GDPR-equivalent data protection obligations.   |
| <b>Residual Risk</b>             | Low. Data is minimal, pseudonymised, legally protected, and processing can be disabled entirely if required by a client. |

---

### 4. Conclusion

Fraudfinder Ltd concludes that the limited, purpose-specific transfers to **OpenAI** and **SendGrid/Twilio** represent **low residual risk**. Both are protected by strong contractual, technical, and organisational controls. All other processing, including OCR, data storage, and AI-based fraud analysis, occurs exclusively within the **UK and EEA (Ireland, Netherlands)**.

Fraudfinder will review this TRA annually or upon any change to vendors, legal mechanisms, or adequacy decisions. Any material impact on clients will be promptly communicated.

---

### 5. Contact

**Data Protection Officer**

Fraudfinder Ltd

Email: [support@fraudfinderai.com](mailto:support@fraudfinderai.com)

Website: [www.fraudfinderai.com](http://www.fraudfinderai.com)