Data Processing Agreement (DPA)

This Data Processing Agreement ("Agreement") is entered into between **BitFoundry OÜ**, an Estonian registered company (the "Processor"), and the customer using ComplySafe.io services (the "Controller").

This Agreement is intended to meet the requirements of Article 28 of the General Data Protection Regulation (EU) 2016/679 ("GDPR").

1. Subject Matter and Duration

The Processor processes personal data solely for the purpose of providing automated compliance scanning and reporting services. Processing continues for the duration of the service agreement.

2. Nature and Purpose of Processing

Processing includes automated analysis of URLs, source code, and metadata to detect compliance and regulatory risks.

3. Types of Personal Data

Personal data may include email addresses, account identifiers, IP addresses, and any personal data contained in scanned materials.

4. Obligations of the Processor

BitFoundry OÜ shall process personal data only on documented instructions from the Controller, ensure confidentiality, apply appropriate technical and organizational security measures, and not use customer data for AI training.

5. Sub-processors

The Processor may engage sub-processors strictly necessary for service delivery, subject to equivalent data protection obligations.

6. Data Subject Rights

The Processor assists the Controller in fulfilling obligations related to data subject rights under GDPR.

7. Data Security

Appropriate technical and organizational measures are implemented to protect personal data against unauthorized access, loss, or disclosure.

8. Governing Law

This Agreement is governed by the laws of the Republic of Estonia.