

WikiSure — Data Processing Agreement (Template v1.0)

Between the **Customer** (Controller) and **SynsureTech B.V., trading as WikiSure** (Processor). This template is GDPR Art. 28 compliant and is provided for procurement review. A counter-signed version is available on request at legal@wikisure.org.

1. Definitions

Terms used in this DPA have the meaning given in Regulation (EU) 2016/679 (GDPR). 'Services' means the WikiSure semantic governance platform as described in the order form or MSA.

2. Roles and Subject Matter

The Customer is the Controller of Personal Data submitted to the Services. WikiSure acts as Processor and processes Personal Data solely on documented instructions from the Customer for the duration of the Services.

3. Categories of Data Subjects and Personal Data

Data Subjects: Customer's employees, contractors, and any individuals referenced in Customer-uploaded documents. Personal Data: business contact details, document metadata, and any Personal Data the Customer chooses to include in uploaded content.

4. Nature and Purpose of Processing

Storage, semantic extraction, drift detection, governance workflow, and reporting on Customer-uploaded business definitions and source documents.

5. Sub-processors (Annex III)

WikiSure maintains a public sub-processor list at <https://wikisure.org/subprocessors> and will give 30 days' prior notice of additions or replacements. Customer may object on reasonable grounds.

6. International Transfers

Personal Data is processed in EU data centres. Where transfers outside the EEA occur via sub-processors, EU Standard Contractual Clauses (2021/914) apply, supplemented by the technical and organisational measures in Annex II.

7. Security Measures (Annex II)

Encryption in transit (TLS 1.2+) and at rest (AES-256). Row-Level Security on all tenant data. Role-based access control with least privilege. Audit logging of governance actions. Backups encrypted; restore tested quarterly. Vulnerability disclosure: security@wikisure.org.

8. Confidentiality

All personnel with access to Personal Data are bound by written confidentiality obligations that survive termination.

9. Personal Data Breach Notification

WikiSure will notify the Customer without undue delay and in any event within 72 hours of becoming aware of a Personal Data Breach affecting Customer data, with the information required by GDPR Art. 33(3).

10. Assistance to Controller

WikiSure will assist the Customer in responding to Data Subject requests and in fulfilling DPIA and prior consultation obligations, taking into account the nature of the processing and the information available.

11. Audit Rights

Customer may audit WikiSure's compliance with this DPA once per year on reasonable notice. WikiSure may satisfy audits by providing the latest independent assessment (e.g. pen-test report, SOC 2 once available) where available.

12. Return and Deletion

On termination, WikiSure will, at Customer's choice, return or delete all Personal Data within 30 days, including from backups within standard rotation. Customer may also self-serve delete documents and derived findings at any time via <https://wikisure.org/data-controls>.

13. Liability

Liability for breach of this DPA is governed by the limitations in the Master Services Agreement between the parties.

14. Governing Law

This DPA is governed by the laws of the Netherlands, without prejudice to the rights of Data Subjects under GDPR.

Annex I — Description of Processing

Categories of Data Subjects, Personal Data, processing operations, retention, and recipients are as described in Sections 3–5.

Annex II — Technical and Organisational Measures

As described in Section 7 and at <https://wikisure.org/security>.

Annex III — Sub-processors

As listed at <https://wikisure.org/subprocessors>. Last updated date and change notifications are published there.

Signed for the Customer: _____ Date: _____

Signed for WikiSure (SynsureTech B.V.): _____ Date: _____

Template v1.0 — This template is provided for procurement review. The legally binding version is the counter-signed copy issued by WikiSure legal.