

DATA PROCESSING AGREEMENT (DPA)

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This Data Processing Agreement forms part of the contractual relationship between:

C.S. EUROSTATUS LTD ("Controller")

and

Any third-party service provider processing personal data on behalf of the Controller ("Processor").

1. Purpose

The purpose of this Agreement is to ensure that personal data processed by the Processor on behalf of the Controller is handled in accordance with GDPR requirements.

2. Scope of Processing

The Processor may process personal data only for the following purposes:

- payment processing
- hosting services
- software infrastructure
- marketing platforms
- analytics services

Processing shall occur only based on documented instructions from the Controller.

3. Types of Personal Data

The categories of personal data may include:

- customer identification data
- contact information
- transaction records
- loyalty program data
- technical usage data

4. Security Measures

The Processor must implement appropriate security measures including:

- encryption of data in transit and at rest
- secure authentication controls
- restricted access to personal data
- regular security audits

5. Subprocessors

Processors may engage subprocessors only with prior authorization from the Controller.

All subprocessors must comply with equivalent data protection obligations.

6. Data Breach Notification

In the event of a personal data breach, the Processor must notify the Controller **without undue delay**, and no later than 72 hours after becoming aware of the breach.

7. Data Deletion

Upon termination of the service agreement, the Processor must:

- delete all personal data
- or
- return the data to the Controller

unless retention is required by law.

8. Audits

The Controller reserves the right to conduct audits or request evidence demonstrating the Processor's compliance with data protection obligations.

9. Liability

Both parties agree to comply with all applicable data protection laws and regulations.

Failure to comply may result in contractual and legal liability.

10. Governing Law

This Agreement shall be governed by the laws of the Republic of Cyprus.