

#### 1. Data Processing Scope

Vendor processes personal data only on documented instructions from Customer.

#### 2. Security Measures

Vendor applies encryption, access controls, and periodic testing.

#### 3. Breach Notification

Vendor notifies Customer without undue delay and within 72 hours where required.

#### 4. Subprocessor Use

Subprocessors are pre-approved and bound by equivalent GDPR obligations.

#### 5. Retention and Deletion

Data is retained only as necessary and deleted or returned at contract end.