VAiyu Data Processing Addendum

Effective Date: October 15, 2025

Subject Matter & Duration

This Data Processing Addendum ("DPA") forms part of the Agreement and applies to VAiyu's processing of personal data on behalf of Customer for the duration of the Agreement.

Roles

Customer is the controller and VAiyu is the processor with respect to personal data processed to provide the Services.

Processor Obligations

- Process personal data only on documented instructions from Customer.
- Implement appropriate technical and organizational measures to protect personal data.
- Ensure personnel are bound by confidentiality obligations.
- Assist Customer with data-subject requests and security incident notifications.

Sub-processors

Customer authorizes VAiyu to engage sub-processors to provide the Services. VAiyu will maintain a list of sub-processors and will impose data-protection obligations equivalent to those in this DPA.

International Transfers

Where applicable, VAiyu will use appropriate safeguards (such as the EU Standard Contractual Clauses) for cross-border transfers.

Return or Deletion

Upon termination of the Services, VAiyu will delete or return personal data, unless retention is required by law.

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