

Acme

Warnings

- Document appears non-DPA (PRD/TDD indicators detected); results may be unreliable.

Executive Summary

Document appears non-DPA (PRD/TDD indicators detected); results may be unreliable. Findings: high=1, med=2, low=0. Top: Audit and Inspection Rights, Assistance with Data Subject Rights and Security, International Transfers.

Extraction Stats

Chars	12665	Pages	8
Chunks	8	Doc Type Score	{'dpa': 5, 'non_dpa': 6}

Risk Table

Check	Severity	Evidence (short)
Audit and Inspection Rights	medium	tance with data subject rights (DSAR) 10) Return/deletion after termination 1 Confidentiality of personnel 13) Liability / limitation (if present in DPA o jurisdiction (if includ
Assistance with Data Subject Rights and Security	medium	cessing 3) Nature & purpose of processing 4) Data categories + data subjects 5) Security measures / TOMs (Art. 32) 6) Subprocessors transfers (SCC/transfer mechanism, locations) 8) Breach notificatio
International Transfers	high	(Art. 32) 6) Subprocessors (list/notice/objection) 7) International transfers (SCC/transfer mechanism, locations) 8) Breach notification (t with data subject rights (DSAR) 10) Return/deletion after termina

Negotiation Pack

Audit and Inspection Rights

Severity: medium

Ask: Include audit/inspection rights with reasonable notice and scope.

Fallback: Allow annual audits by a qualified third-party auditor under confidentiality.

Rationale: Audit rights are necessary to verify compliance with Article 28(3)(h).

Assistance with Data Subject Rights and Security

Severity: medium

Ask: Processor must assist with data subject requests and maintain appropriate security measures.

Fallback: Provide reasonable assistance and maintain industry-standard technical and organizational measures.

Rationale: Article 28(3)(e)-(f) requires assistance and security obligations.

International Transfers

Severity: high

Ask: Specify GDPR Chapter V transfer mechanism (e.g., SCCs) for cross-border transfers.

Fallback: Commit to an approved transfer mechanism before any international transfer.

Rationale: Transfers require a lawful mechanism under Chapter V.

Evidence: Audit and Inspection Rights

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Evidence: Assistance with Data Subject Rights and Security

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Evidence: International Transfers

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