

# VORTEX FILES - DATA PROCESSING AGREEMENT (TEMPLATE)

Effective Date: 2026-03-03

## 1) Parties & Scope

- QVXX Ltd. (Vortex Files) acts as Processor; Customer acts as Controller/Processor.
- Subject matter: platform hosting, file collaboration, authentication, support.
- Duration: term of services and limited retention periods for legal/security reasons.

## 2) Processing Details

- Purpose: provide and secure Vortex Files services.
- Data subjects: customer users, collaborators, invited clients.
- Data categories: account identifiers, contact details, IP/login logs, file metadata.

## 3) GDPR Article 28 Commitments

- Process only on documented instructions.
- Personnel confidentiality obligations.
- Appropriate technical and organizational security measures.
- Assistance with data subject rights and DPIA support.
- Compliance information and audit cooperation.

## 4) Subprocessors

- General subprocessor authorization.
- Material subprocessor changes will be notified via legal updates.
- Current list: <https://vortexfiles.qvxx.ai/legal/privacy#subprocessors>

## 5) International Transfers

- SCCs and/or UK transfer addenda used where adequacy does not apply.

## 6) Security & Breach Notification

- Risk-based security program with encryption, access controls, and monitoring.
- Incident notice without undue delay after confirmed personal data breach.

## 7) Audit Rights

- Reasonable, risk-proportionate audit process with notice, usually once/year.

## 8) Deletion/Return

- Return or deletion on request at end of service, subject to lawful retention.

Contact: [compliance\\_vortexfiles@qvxx.ai](mailto:compliance_vortexfiles@qvxx.ai)

This is a template summary. See /legal/dpa for full online version.