AEGIS PRIVACY

DATA HANDLED WITH INTENT

REFERENCE {{referenceId}}
STATUS REVIEW READY
OWNER {{documentOwner}}

Data Processing Agreement

A reusable DPA framework documenting processing instructions, roles, security measures, subprocessors, assistance, audits, and deletion obligations.

TECHNICAL RELEASE · 4 August 2026

Document contents

Document status	Review basis	Version
Draft for review	Organization-specific adaptation required	1.0

0.1 Scope and roles

Identify controller, processor, affected services, precedence, definitions, and the relationship to the main agreement.

Document control	Detail
Owner	Mara Klein
Reference	NS-030-2026
Effective date	4 August 2026
Status	Ready for review

0.2 Documented instructions

Limit processing to lawful documented instructions and define the escalation process for unlawful or incomplete instructions. **Review record:** Assign the owner, evidence, dependencies, decision date, and next action.

0.3 Personnel and confidentiality

Require authorized personnel, confidentiality commitments, training, need-to-know access, and access lifecycle controls.

Requirement	Position	Evidence	Owner
Personnel and confidentiality	Drafted for review	Linked record	Mara Klein
Jurisdiction check	Required	Legal review	Counsel

0.4 Security measures

Document governance, access, encryption, resilience, recovery, testing, vulnerability, logging, physical, and supplier controls. **Review record:** Assign the owner, evidence, dependencies, decision date, and next action.

0.5 Subprocessors and transfers

Set authorization method, notice period, objection path, flow-down terms, list maintenance, and transfer safeguards. **Review record:** Assign the owner, evidence, dependencies, decision date, and next action.

0.6 Data subject and authority support

Define assistance for rights requests, impact assessments, consultations, records, and regulator inquiries. **Review record:** Assign the owner, evidence, dependencies, decision date, and next action.

0.7 Security incidents

Set notification timing, minimum incident details, investigation, containment, evidence, updates, and responsibility allocation. **Review record:** Assign the owner, evidence, dependencies, decision date, and next action.

0.8 Audit, return, and deletion

Define information rights, audits, certifications, cost allocation, deletion timing, backups, return formats, and confirmation. **Review record:** Assign the owner, evidence, dependencies, decision date, and next action.

0.9 Processing annex

Record subject matter, duration, nature, purpose, data categories, data subjects, locations, contacts, and retention. **Review record:** Assign the owner, evidence, dependencies, decision date, and next action.

0.10 Approval and signatures

By signing, the parties confirm that they have reviewed the document and accept the recorded decision or terms.

> **Review notice:** Review and adapt this template with qualified professional advice before relying on it.

Name *

Title or role *

Signature *

Date *