

# DATA PROCESSING AGREEMENT — TEMPLATE (DRAFT 2026)

Global Source Data Solutions Inc. (GSDSI) — negotiating scaffold only · Not executable until mutually signed.

**Important:** This PDF summarizes template modules published on [gsdsi.com/trust/dpa](https://gsdsi.com/trust/dpa) for vendor diligence. It does not constitute legal advice. Final language must be agreed in writing between the parties or their counsel.

## Roles and scope

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- Customer as controller / GSDSI as processor within the service description executed under the underlying order.
- Processing limited to lawful instructions, subprocessors disclosed at [gsdsi.com/trust/sub-processors](https://gsdsi.com/trust/sub-processors), and SCC references where GDPR/UK transfers apply.

## Technical and organizational measures (summary)

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- TLS 1.2+ for data in transit; AES-256-class encryption at rest within cloud tiers.
- MFA and RBAC for GSDSI operators; SSO available for entitled Octopus tenants.
- Logging, monitoring, coordinated vulnerability disclosure (see SECURITY.md and `/.well-known/security.txt`).

## Incident notification posture (summary)

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- Tiered SLAs summarized on [gsdsi.com/trust/security-program](https://gsdsi.com/trust/security-program) — including preliminary notice timelines for suspected incidents and GDPR-class windows when materially confirmed.
- Cooperation with supervisory authorities and lawful data-subject workflows as described in the full template.

## Assist, audit, deletion

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- Assist with regulator inquiries and DPIA prompts where proportional.
- Audit rights calibrated to SOC 2 or equivalent artefacts when issued.
- Return or secure deletion pathways at termination as described contractually.

For the live HTML overview and downloads, visit <https://www.gsdsi.com/trust/dpa>. Sub-processor disclosures: <https://www.gsdsi.com/trust/sub-processors>.

**Draft PDF generated for diligence — do not circulate as executed.**