

Data Processing Agreement

Elofyn Solutions Pvt Ltd - v1 - 2026-05-31

DRAFT - pending legal review

This document is a placeholder draft circulated for review before contract signing. It tracks the minimum-required clauses of GDPR Article 28 (subject-matter, duration, nature and purpose of the processing, types of personal data, categories of data subjects, controller obligations) and the EU Commission's published Article 28 mutual-controller-processor template, with Elofyn-specific Schedule A (subject-matter and duration), Schedule B (categories of data subjects and personal data processed) and Schedule C (technical and organisational measures, mirroring the trust center at elofyn.com/security).

A counter-signed final version is issued by Elofyn legal upon Dev Snippets API enterprise contract. Until then, this draft is non-binding and any reliance on its specific wording is at the reader's own risk.

Schedule A - Subject-matter and duration

Subject: Provision of elofyn.com web services and the Dev Snippets API.

Duration: Term of the relevant Order Form.

Schedule B - Categories of data subjects and personal data

Data subjects: Website visitors, contact-form submitters, API customers.

Data: Email address, contact-form message body, payment-method token (Phase D), server logs.

Schedule C - Technical and organisational measures

See elofyn.com/security section 06 - encryption in transit (TLS 1.3 + HSTS), encryption at rest (LUKS + AES-256), backup cadence (daily, 30-day retention), key rotation (≤ 365 days), data residency (us-central1, no cross-region replication).