

## Data Processing Statement

**Effective date:** November 1, 2025

### Purpose

This Data Processing Statement explains GuardRail's role in handling customer and personal information through the Services.

### Roles

In most cases:

- the organisation using GuardRail determines what information is collected, uploaded, and shared through the Services,
- GuardRail processes that information on behalf of the organisation in order to provide the Services.

For some information, GuardRail may also act as an independent controller/business where we process data for our own legitimate business purposes, such as billing, security, fraud prevention, legal compliance, and service analytics.

### Processing Activities

GuardRail processes data to:

- host vendor registers and related records,
- manage account access and authentication,
- transmit invitations, reminders, and notifications,
- store uploaded records and supporting documents,
- generate reports,
- secure, monitor, and improve the Services,
- perform backup, disaster recovery, and support functions.

### Types of Data

Depending on customer use, GuardRail may process:

- account and identity data,

- organisation and contact data,
- vendor declarations,
- contract and review metadata,
- uploaded files and supporting documents,
- usage logs and technical metadata.

## Customer Responsibilities

Customers are responsible for:

- determining whether use of GuardRail is lawful for their purposes,
- ensuring they have a lawful basis to collect, upload, and disclose personal information to GuardRail,
- configuring user access appropriately,
- reviewing vendor information before relying on it,
- responding to data subject requests where they are the controller/business,
- ensuring notices and policies to their own users or vendors are appropriate.

## GuardRail Responsibilities

GuardRail will:

- process customer data only as necessary to provide the Services and support related operations,
- implement reasonable security safeguards,
- use sub-processors and infrastructure providers to support the Services,
- assist customers with reasonable requests concerning customer data where appropriate,
- notify customers of data breaches where required by law or contract.

## Sub-processors

GuardRail may use third-party sub-processors or service providers for hosting, infrastructure, email delivery, analytics, monitoring, storage, customer support, and payment processing. A current sub-processor list may be made available on request or via our website.

## International Processing

Customer data may be processed in countries where GuardRail or its sub-processors operate. GuardRail takes reasonable steps to select providers and arrangements appropriate for the Services.

## Security Measures

GuardRail applies reasonable technical and organisational measures appropriate to the nature of the Services, including access controls, encryption in transit, secure hosting, logging, and role-based restrictions.

## Deletion and Return

Subject to legal and operational requirements, GuardRail will provide customers with reasonable means to export their data and will delete or de-identify customer data after termination in accordance with our retention processes and service settings.

## Assistance

Where appropriate and proportionate, GuardRail may assist customers with access, correction, deletion, or incident-related requests relating to customer data.

## Priority of Agreements

If GuardRail enters into a separate Data Processing Addendum or enterprise agreement with a customer, that agreement will prevail to the extent of inconsistency for that customer.