Data Processing Addendum (DPA)

*Xyberteq Innovations Sdn. Bhd. | Company No: 201701035190 (1249361-M)*

*No.14, Persiaran Damansara Endah, Damansara Endah, Damansara Heights, 50490 Kuala Lumpur, Malaysia*

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# Definitions

Capitalised terms have the meaning given in the Agreement and this DPA. “EU Data Protection Laws” means GDPR and national implementations.

# Role of the Parties

Customer acts as Controller and Xyberteq Innovations Sdn. Bhd. acts as Processor in respect of Personal Data processed through Sentient Spire QCS™ (core platform), Sentient Spire Advisory, Sentient Spire Exposure Intelligence, Sentient Spire Mobile Solution.

# Processing Details

Subject matter: Provision of Sentient Spire QCS™ (core platform), Sentient Spire Advisory, Sentient Spire Exposure Intelligence, Sentient Spire Mobile Solution.

Duration: Term of the Agreement + retention periods.

Nature and purpose: Hosting, analysis, logging, AI‑assisted detection, customer support.

Categories of data subjects: end users, client staff, administrators.

Categories of personal data: identifiers, contact details, auth tokens (hashed), telemetry/log metadata; no special categories intentionally processed.

Sub‑processors: Google Cloud (primary hosting), email/SMS providers (as configured), ticketing/CRM systems (if enabled).

# Processor Obligations

Process Personal Data only on documented instructions.

Confidentiality by all personnel.

Security measures (Annex 2).

Assist with data subject rights and DPIA.

Notify Controller of Personal Data Breach without undue delay.

Delete or return Personal Data at end of services.

# International Transfers & SCCs

For transfers to third countries without adequacy, Parties incorporate the EU Commission SCCs (2021/914) – Modules 2 and/or 3 as applicable.

# Audit & Compliance

Make available information necessary to demonstrate compliance and allow for audits subject to reasonable notice and confidentiality.

# Annex 1 – Processing Summary

See ROPA register. Product scope: Sentient Spire QCS™ (core platform), Sentient Spire Advisory, Sentient Spire Exposure Intelligence, Sentient Spire Mobile Solution.

# Annex 2 – Technical & Organisational Measures (TOMs)

Encryption in transit (TLS 1.2+), encryption at rest (GCP managed keys/KMS).

Network segregation, firewalling, WAF/Cloud Armor, vulnerability management.

Access control (least privilege, MFA, strong IAM, logging/monitoring).

Backups, disaster recovery, incident response plan.

Secure SDLC, code review, secrets management.

Supplier due diligence, security awareness training.

# Annex 3 – Sub‑processors

Google Cloud Platform (compute, storage, databases).

Mail/SMS providers (e.g., SendGrid/Twilio) if configured by the Customer.

Optional threat intel integrations configured by Customer (e.g., AbuseIPDB, Maltiverse).