

SPRINKLING ACT · LEGAL

Data Processing Agreement

Version 3.0 · March 1, 2026

This document describes how Sprinkling Act processes personal data and lists our sub-processors, in accordance with GDPR Article 28.

1. Roles

Data Controller: Lamar B. Shucrani, operating as Sprinkling Act (BCE: BE 1034.962.482).

Sprinkling Act determines the purposes and means of processing personal data collected through sprinklingact.com.

Data Subjects: Users of the Sprinkling Act service (account holders, diagnostic users, waitlist subscribers, newsletter subscribers, and site visitors who consent to analytics).



2. Sub-processors

Supabase Inc.

Service: Database, authentication, storage

Location: European Union

Data: Account, diagnostic, waitlist, newsletter, analytics

DPA: supabase.com/legal/dpa

Vercel Inc.

Service: Hosting, CDN, serverless

Location: Global edge (EU primary)

Data: Server logs, request metadata

DPA: vercel.com/legal/dpa

Resend Inc.

Service: Transactional email

Location: United States

Data: Email addresses, email content

DPA: resend.com/legal/dpa

Stripe Payments Europe Ltd

Service: Payment processing

Location: Ireland (EU)

Data: Payment and billing info

DPA: stripe.com/legal/dpa

Sentry (Functional Software Inc.)

Service: Error monitoring

Location: United States

Data: Request metadata (IP, user agent, error context)

DPA: sentry.io/legal/dpa



3. Processing Instructions

Sprinkling Act processes personal data only on documented instructions from the data controller (i.e., as defined by this DPA and the Terms of Service). Processing is limited to:

- Providing the diagnostic and reporting service
- Sending transactional and notification emails
- Processing payments via Stripe
- Analytics (only with explicit consent)

Sprinkling Act will not process personal data for any other purpose without prior written instruction.

4. International Transfers

Personal data may be transferred outside the EU/EEA to the following sub-processors:

Resend Inc. (United States), Transactional emails. Transfer mechanism: EU Standard Contractual Clauses (SCCs) Module Two (Controller to Processor), as incorporated in Resend's DPA.

Vercel Inc. (Global edge network), Hosting. Transfer mechanism: EU Standard Contractual Clauses (SCCs) as incorporated in Vercel's DPA.

Sentry (United States), Error monitoring. Transfer mechanism: EU Standard Contractual Clauses (SCCs) as incorporated in Sentry's DPA.

Sub-processors located within the EU/EEA (Supabase, Stripe) do not require additional transfer mechanisms under GDPR Chapter V.

5. Security Measures

- Encryption in transit (TLS 1.3) and at rest
- HSTS with preloading
- Content Security Policy enforced
- Row Level Security on all database tables
- Passwords hashed (bcrypt via Supabase Auth)
- No plaintext storage of sensitive data
- Production access limited to data controller
- Regular dependency updates
- Session-based authentication with automatic expiry

6. Breach Notification

In the event of a personal data breach, Sprinkling Act will:

- Notify the Belgian Data Protection Authority (APD/GBA) within 72 hours (GDPR Article 33)
- Notify affected data subjects without undue delay if the breach is likely to result in a high risk to their rights and freedoms (GDPR Article 34)
- Provide a description of the breach, categories of data affected, estimated number of data subjects, and measures taken or proposed

7. Audit Rights

Data subjects and supervisory authorities may request information about the processing activities carried out by Sprinkling Act. Sprinkling Act will make available all information necessary to demonstrate compliance with GDPR Article 28 obligations. Audit requests should be directed to legal@sprinklingact.com.

8. Data Deletion

Upon request, all personal data will be deleted within 30 days. Upon termination of a sub-processor relationship, data is deleted per their respective DPA terms. After the end of the service relationship, Sprinkling Act will delete or return all personal data at the data controller's choice, unless EU or Belgian law requires continued storage.

9. Duration & Hierarchy

This DPA applies for the duration of any processing of personal data by Sprinkling Act. In case of conflict between this DPA and the Terms of Service, this DPA prevails with respect to data protection matters. Standard Contractual Clauses (where applicable) prevail over this DPA.

10. Contact

Data Controller : Lamar B. Shucrani

Email : legal@sprinklingact.com

BCE : BE 1034.962.482

Avenue des Arts 19 BT 2, 1210 Brussels, Belgium

Supervisory Authority : Autorité de protection des données (APD/GBA), Brussels, Belgium