

DATA PROCESSING AGREEMENT

This Data Processing Agreement (“DPA”) forms part of the Terms of Service (the “Agreement”) between:

Customer (the “Controller”),

and

Website Toolbox LLC, 151 Calle de San Francisco, Suite 200 PMB 5346, San Juan, PR, 00901-1607 (the “Processor”).

1. Subject Matter

This DPA governs the Processor’s processing of Personal Data on behalf of the Controller in connection with services provided under the Agreement.

2. Nature and Purpose of Processing

Processor will process Personal Data to provide a hosted forum/community platform, as described in the Agreement.

3. Duration

Processing will continue for the duration of the Agreement unless otherwise agreed in writing.

4. Types of Personal Data and Data Subjects

- Types: Names, email addresses, IP addresses, user-generated content, etc.
- Data Subjects: Users and visitors of the Controller’s community.

5. Processor Obligations

Processor shall:

- Process data only on documented instructions;
- Maintain confidentiality;
- Implement appropriate security measures;
- Assist with data subject rights requests;
- Assist with data protection impact assessments;
- Notify the Controller of any data breach without undue delay.

6. Sub-Processors

Processor may engage sub-processors listed in Appendix A, and may change or add sub-processors at its discretion without prior notice to the Controller.

7. Data Transfers

If data is transferred outside the EEA, Processor shall ensure appropriate safeguards are in place (e.g., Standard Contractual Clauses).

8. Data Return or Deletion

Upon termination, Processor will, at the choice of the Controller, delete or return all Personal Data, unless retention is required by law.

9. Audits

Processor shall make available information necessary to demonstrate compliance and allow for audits if required.

10. Governing Law

This DPA shall be governed by the laws of the Commonwealth of Puerto Rico.

IN WITNESS WHEREOF

The parties have executed this Data Processing Agreement as of the effective date of the Agreement.

Appendix A - Sub-Processors

Sub-Processor	Purpose of Processing	Place of Processing	Technical and Organizational Measures (TOMs)
Google Analytics	Website usage analytics	USA / Global	Data encryption in transit and at rest, access controls, anonymization of IP addresses, ISO 27001, SOC 2 certifications
Google reCAPTCHA	Bot/spam prevention	USA / Global	Encryption in transit, minimal data collection, access control, Google compliance with ISO 27001, SOC 2
Olark	Live chat support	USA	Data encryption, access control, regular monitoring, GDPR-compliant practices
FullStory	Session replay and UX analytics	USA	Pseudonymization, encryption, access

			control, SOC 2 Type II, ISO 27001
Sentry	Application error tracking	USA / EU	Data encrypted in transit, access controls, redaction of sensitive data, SOC 2 Type II
Amazon AWS	Cloud infrastructure and hosting	USA / Global	ISO 27001, SOC 1/2/3, encryption at rest and in transit, DDoS protection, access logging
Google Cloud Platform	Cloud infrastructure and hosting	USA / Global	ISO 27001, SOC 1/2/3, encryption at rest and in transit, identity and access management
Akismet	Spam detection for user content	USA	Minimal data retention, IP anonymization, encrypted communication, data minimization

Appendix B - List of parties

Company: Website Toolbox LLC

Role: Processor

Address: 151 Calle de San Francisco, Suite 200 PMB 5346, San Juan, PR, 00901-1607

Phone: +1-800-921-7803

Contact Person: Sandeep Sondhi

Contact Position: CEO