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Data processing agreement

CODE Internet Applications BV

Version 1.0

General information

1. **This processing agreement was drawn up by CODE Internet Applications BV**, a limited liability company (in Dutch: Besloten vennootschap met beperkte aansprakelijkheid) established under Dutch law, localized in Delft (The Netherlands) and registered with the Dutch Chamber of Commerce under number 27255884. Hereinafter `data processor`

   If you have any queries about this Data processing agreement please contact:

   Patrick Watzeels

   patrick@code.nl

   + 31 (0) 15 213 06 00

2. **This agreement goes into effect when you have installed one of our apps.**
   We revise the measures outlined in this document to ensure that we are always fully prepared and up to date with regard to the data protection. When this document is updated the revised versions can be found in our support helpdesk.

3. **This agreement applies to the following products provided by the data processor:**
   Applications that can be installed to extend the functionality of Shopify delivered by CODE.

4. **These types of data are processed by the data processor (depending on the app):**
   - ○ Generic store data
   - ○ Order data
   - ○ Fulfillment data
   - ○ Product data
   - ○ Refund data
   - ○ Customer data

   Not all the apps will process all types of data. Data is only processed when essentially needed in order to operate properly. You can find the exact data types when you view the App permissions in your Shopify Apps overview.

5. **Data is being processed and purged in the following manner:**
   - ○ Our apps will store only the data that is essentially needed to operate
   - ○ After 3 months all sensitive data is being deleted from our systems. By sensitive data we mean: Order data, Fulfillment data, Refund data and Customer data.
   - ○ CODE is transparent regarding the data we store
   - ○ All data transactions are encrypted by means of SSL-certificates.
   - ○ CODE does not sell any personal data to 3rd parties or uses the Personal Data for purposes of its own.

6. **The data processor uses the following sub-processors:**
   These companies may receive Personal Data for that purpose. They will handle your data with, at least, the same care as we do:
   - ○ Exact Online
   - ○ PostNL
   - ○ Google LLC

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7. **The data processor will support its clients in the following way when they receive requests from data subjects:**

    Within Shopify merchants can perform a request through Shopify Admin Customers interface. An immediate reply will follow from our API.

    It is also possible to send a request to patrick@code.nl, then the client will receive the requested data (if available).

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Security policy

1. **The data processor has implemented the following security measures to protect its products:**

    a. Communication from and to the platform is encrypted

    b. Database queries are created and running via protected queries.

    c. The data in the shop is secured that it is only accessible by the shop owner

    d. Communication within the platform is ensured via signed variable security hashes

    e. Sensitive data is removed 3 months after processing. By sensitive data we mean: Order data, Fulfillment data, Refund data and Customer data.

    f. Hosting of the data takes place on Google Cloud Platform, which is the same platform as where Shopify hosts its services.

Data breach protocol

1. **In case a data breach is discovered the data processor will inform their clients of the incidents:**

    a. The data processor will provide the information relating to the data breach, in accordance with the GDPR, with the necessary information and will also inform the Dutch Data Protection Authority (Autoriteit Persoonsgegevens).

    b. When the data breach was discovered the data processor will take appropriate measures in order to limit the consequences and to prevent a new breach.

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Appendix I: Definitions

The following terms have the following means ascribed t then in the agreement:

1. **Dutch Data Protection Authority (AP)**: The Dutch regulatory agency "Autoriteit Persoonsgegevens" outlined in Section 4.21 of the GDPR.

2. **GDPR**: General Data Protection Regulation

3. **Data Processor**: the party that processes Personal data on behalf of its Clients as part of this agreement.

4. **Client**: The party on whose behalf the Data Processor processes Personal data. Mostly this is a shop merchant.

5. **Personal data**: Any and all data regarding a natural person who has been or can be identified as outlined in Article 4.1 of the GDPR, processed by the Data Processor to meet its requirements under the Agreement