Data Processing Agreement

Scaled Support - Cover Page - October 30, 2026
DRAFT: company details in brackets are still to be filled in.

This Cover Page and the Common Paper DPA Standard Terms Version 1.1 (https://commonpaper.com/standards/data-processing-agreement/1.1) together form the Data Processing Agreement between Provider and Customer.

Agreement

Agreement
The Scaled Support Terms of Service (https://scaledsupport.com/terms) between Provider and Customer.

Standard Terms
This Cover Page incorporates the Common Paper DPA Standard Terms Version 1.1 (https://commonpaper.com/standards/data-processing-agreement/1.1). If they conflict, this Cover Page wins.

Approved Subprocessors
Supabase; Vercel; OpenRouter; Amazon Web Services (Bedrock) and Google Cloud (Vertex AI); Microsoft Azure (OpenAI models). The current list, with locations, is at https://scaledsupport.com/security#subprocessors.

Provider Security Contact
[contact email]

Security Policy
The technical and organizational measures in Annex II and at https://scaledsupport.com/security.

Service Provider Relationship
To the extent the CCPA applies, Provider is Customer's service provider.

Governing Law and Chosen Courts
The law and courts of [Country of registration].

Restricted Transfers
EEA and UK transfers use the Standard Contractual Clauses (Module 2 controller-to-processor, or Module 3 processor-to-processor) and the UK Addendum. Governing Member State: Ireland.

Changes to the Standard Terms
DPA Liability Cap: the liability cap in the Agreement applies to this DPA.

Annex I(A): List of parties

Data exporter
Customer, as named on the signature block. Role: controller (or processor for its own clients).

Data importer
[Company legal name], [Registered address], [Country of registration]. Contact: [contact email]. Role: processor.

Annex I(B): Description of processing

Service
Support ticketing and AI-drafted replies for messages in the Slack channels, mailbox and website chat Customer connects.

Categories of data subjects
Customer's own customers and their staff who write in; Customer's employees who use the service; website visitors who use the chat.

Categories of personal data

Names, email addresses, Slack user IDs, message and email content, file names (never file contents), and any personal data people choose to put in their messages.

Special category data

None intended. Customer should not connect channels used to share special category data.

Frequency of transfer

Continuous, while Customer uses the service.

Nature and purpose of processing

Receiving, storing and organizing messages as tickets; looking up Customer's help docs; generating draft replies with AI models under zero data retention; sending replies Customer approves or allows.

Duration of processing

For the term of the Agreement. Tickets and messages are deleted 365 days after their last activity (Customer can shorten this), and all Customer data within 30 days after the Agreement ends.

Annex I(C): Competent supervisory authority

Supervisory authority

The supervisory authority of the EU member state where Customer is established, or the Irish Data Protection Commission if Customer is outside the EEA.

Annex II: Technical and organizational measures

Hosting

Data stored in the EU (Supabase, Ireland, eu-west-1); application in Dublin (Vercel).

Encryption

TLS in transit; encryption at rest; Slack and Gmail tokens additionally encrypted with AES-256-GCM.

Access control

Row-level security separates every workspace's data; only Customer's members can see its tickets; admin-only audit log of every bot action.

Data minimization

Only connected channels and mailbox are stored; attachments never stored; messages from other channels discarded on arrival; retention-based deletion.

AI providers

Requests routed only to endpoints with zero data retention and no training on Customer data.

Request integrity

Slack requests verified by signature; webhooks acknowledged and queued, never processed in the request.

Signatures

Provider

Signature: _____

Print name: _____

Title: _____

Date: _____

Customer (company name and address)

Signature: _____

Print name: _____

Title: _____

Date: _____

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