

Sample Data Processing Agreement — AVGfilter

Model document for orientation · Version 1.0 · Not legal advice; have the final version reviewed by your counsel or DPO.

1. Parties and subject matter

This data processing agreement (the "Agreement") is entered into between the customer (the "Controller") and AVGfilter (the "Processor") for the provision of the AVGfilter tokenization service (the "Service"). The Service replaces personal data in text with tokens before that text is sent to an AI model, and restores the tokens in the answer.

2. Nature and purpose of processing

- Detection and tokenization of personal data in text supplied by the Controller.
- Temporary storage of the mapping between tokens and original values (the "token mapping") within the EU.
- Detokenization of model answers and deletion of the token mapping after the conversation is cleaned up or after thirty days at the latest.

3. Categories of personal data

Names, addresses, postal codes, phone numbers, email addresses, national IDs, IBANs, company registration numbers and location data, insofar as present in the supplied text.

4. Security measures

- Processing and storage exclusively within the European Union.
- The token mapping never leaves the filter service; the end user's browser does not receive it.
- Fail-closed behaviour: if the Service is unavailable, nothing is sent to the AI model.
- Logging limited to detected categories and counts, without the content of the text.

5. Sub-processors

The Processor informs the Controller in advance of intended changes in sub-processors. The Controller has the right to object. A current overview is provided on request.

6. Data subject rights and breaches

The Processor assists the Controller, as far as reasonably possible, with data subject requests and reports personal data breaches without undue delay.

7. End of services

Upon termination, all token mappings and residual data are deleted, unless a statutory retention obligation prevents this.