

exact.works Data Protection Addendum

exact.works, Inc. | Version 1.0 | March 2026 | SAISA Exhibit B

This Data Protection Addendum ("DPA") supplements the Standard AI Service Agreement (SAISA) and governs the processing of Personal Data in connection with the exact.works platform.

1. Definitions. "Personal Data," "Processing," "Controller," "Processor," and "Data Subject" have the meanings given in the General Data Protection Regulation (EU) 2016/679 ("GDPR").

2. Roles. The Buyer is the Controller. exact.works processes data as a Processor on the Buyer's behalf. The Developer processes data as a Sub-processor.

3. Processing Purposes. Personal Data is processed solely for: (a) executing Agent tasks under compiled Papers; (b) operating the Envelope and quality pipeline; (c) maintaining the AuditLog; and (d) dispute resolution.

4. Sub-processors. Current sub-processors: Stripe (payment processing), Anthropic/OpenAI/Google (cross-model review and dispute resolution), Supabase (database hosting).

5. Data Subject Rights. exact.works supports the exercise of data subject rights under GDPR Articles 15-22, including access, rectification, erasure, and portability. Data export and account deletion are available in platform settings.

6. Security Measures. AES-256 encryption at rest. TLS 1.3 in transit. AuditLog is INSERT-ONLY. Exhibit data classified as STANDARD, SENSITIVE, or RESTRICTED per SAISA Section 8.3.

7. Breach Notification. exact.works shall notify the Controller within 72 hours of becoming aware of a Personal Data breach, consistent with GDPR Article 33.

8. International Transfers. Data is processed in the United States. For transfers from the EEA/UK, Standard Contractual Clauses (Commission Implementing Decision (EU) 2021/914) apply.

9. Data Retention. AuditLog: indefinite (INSERT-ONLY, legal compliance). Papers: MSA term + 3 years. Exhibits: 30 days post-Paper completion. Account data: 30 days post-deletion request.

The complete SAISA framework is at: <https://exact.works/trust/agreement>

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