

CBAMValid — Data Processing Agreement (DRAFT)

Status: DRAFT for procurement discussion. Not a signed agreement.

Issuer: SectorCalc Corporation (CBAMValid)

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1. Subject matter

Processing of customer account, case, evidence metadata, and sealed package records required to operate the CBAMValid Preparation Pack service.

2. Roles

Customer = Controller (or Processor for its clients).

CBAMValid / SectorCalc Corporation = Processor for customer case data.

3. Hosting region

Primary application region: Google Cloud / Firebase europe-west1 (EU).

4. Security measures (factual)

- HTTPS/TLS for public endpoints
- HttpOnly server session cookies
- Server-side tenant and case authorization
- Provider encryption at rest (Firestore / Cloud Storage defaults)
- Immutable sealed release objects once published

5. Sub-processors (material)

- Google Cloud / Firebase: hosting, auth, Firestore, Storage, Functions/Cloud Run
- Paddle: payment processing / merchant of record for paid lock checkout

6. Certification honesty

This draft does NOT claim ISO 27001, SOC 2, or equivalent certification.

Certificates will be published only with issuer, scope, and validity dates.

7. Deletion / access requests

privacy@cbamvalid.com or info@cbamvalid.com

Sealed packages already shared with buyers may remain with recipients under their own retention duties.

8. Independence boundary

CBAMValid packages are operator-prepared. Processing under this DPA does

not create an accredited verification opinion.