

Starase Ltd – Data Processing Agreement (DPA)

Effective Date: 1 October 2025

This DPA is made between **Starase Ltd. (“Processor”)** and the **Customer (“Controller”)**, and supplements the main contract for hosting and related services.

1. Scope

Applies to all processing where Starase hosts, stores, or transmits Customer Data on behalf of the Controller, including emails, files, websites, and other hosted content.

2. Processor Obligations

Processor shall:

- Process Customer Data only on documented instructions from Controller.
- Ensure confidentiality of personnel who access data.
- Implement technical and organisational measures (TOMs) to protect data.
- Assist Controller with data subject rights requests (access, erasure, portability).
- Assist with security incident management and breach notifications (without undue delay, within 48 hours where feasible).
- Return or delete Customer Data upon termination, unless retention is legally required.
- Provide information and allow audits, subject to reasonable notice.

3. Subprocessors

- **Contabo** – Infrastructure hosting – Germany – [\[Link\]](#)
- **Tiktalik** – Infrastructure hosting – Poland – [\[Link\]](#)
- **Cloudflare** – DNS & DDoS protection only; no personal data stored – USA/EU – [\[Link\]](#)

Controllers will be notified of new subprocessors or material changes.

4. International Transfers

Transfers outside the UK rely on adequacy decisions or Standard Contractual Clauses (SCCs). Copies available on request.

5. Security & Access

- Access limited to authorised personnel.
- Access logged and monitored.
- TLS encryption, strong passwords, and optional MFA applied.
- Security incidents handled per UK GDPR / DUAA 2025.

6. Term & Termination

- DPA effective for duration of processing.
- Data deletion, audit, and security obligations survive termination until all Customer Data is returned or deleted.

7. Liability

Liability under this DPA is subject to limitations and exclusions in the main contract.

8. Accessibility

DPA provided in clear English. For alternative formats, contact privacy@starase.com