



DATA PROCESSING ADDENDUM (DPA)

Qbil Software B.V.

This Data Processing Addendum (“DPA”) forms part of the agreement between **Qbil Software B.V.** (“Qbil”, “we”, “our”, or “us”) and its customers (“Customer”) regarding the processing of personal data in connection with the use of Qbil Software solutions, including **Qbil-Trade and Moo Software**.

Qbil Software B.V. is committed to protecting personal data and processing it in accordance with applicable data protection laws, including the **General Data Protection Regulation (GDPR)**.

1. Roles and Responsibilities

For the purposes of applicable data protection laws:

- The **Customer acts as the Data Controller**, determining the purposes and means of processing personal data.
- **Qbil Software B.V. acts as the Data Processor**, processing personal data solely on behalf of the Customer and in accordance with the Customer’s documented instructions.

Qbil processes personal data only as necessary to provide and support its software services.

2. Nature and Purpose of Processing

Qbil may process personal data in order to provide the following services:

- ERP software solutions for commodity and ingredient trading
- system hosting and data storage
- software maintenance and updates
- customer support and technical assistance
- system security monitoring and incident response

Processing activities may include:

- storing data
 - organizing and structuring data
 - retrieving and transmitting data
 - securing and backing up data
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3. Types of Personal Data

Depending on the Customer's use of the software, the following categories of personal data may be processed:

- contact details (name, email address, phone number)
- business contact information
- system user credentials
- transactional and operational data entered by users
- communication records related to support requests

Qbil does **not intentionally process special categories of personal data** unless explicitly instructed by the Customer.

4. Security Measures

Qbil Software B.V. implements appropriate **technical and organizational measures** to ensure the confidentiality, integrity, and availability of personal data.

These measures include, but are not limited to:

Infrastructure and Hosting

- secure cloud infrastructure hosted within the **European Union**
- logical separation of customer environments
- redundancy and backup across multiple availability zones

Data Protection

- encryption of data in transit (TLS/HTTPS)
- encryption of data at rest where applicable
- strict access control and authentication mechanisms

Security Management

- vulnerability monitoring and regular security updates
- incident detection and response procedures
- access logging and monitoring

Qbil continuously reviews and improves its security controls as part of its information security management processes.



5. Sub-processors

Qbil may engage carefully selected **sub-processors** to support the delivery of its services, such as:

- cloud hosting providers
- infrastructure providers
- communication services
- support and monitoring tools

All sub-processors are contractually required to maintain appropriate data protection and security standards.

A list of current sub-processors can be made available upon request.

6. Data Transfers

Qbil processes and stores data primarily within the **European Economic Area (EEA)**.

If personal data is transferred outside the EEA, Qbil ensures appropriate safeguards are in place, such as:

- Standard Contractual Clauses (SCCs)
 - adequate protection decisions by the European Commission
 - contractual security and confidentiality obligations
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7. Data Retention and Deletion

Customer data is retained only for as long as necessary to provide the services.

Upon termination of the service agreement:

- customer data will be returned or made available for export where applicable
- data will subsequently be securely deleted within a defined retention period, unless legal obligations require longer storage

Secure data destruction processes are used to prevent unauthorized access or recovery.

8. Data Subject Rights

Qbil supports its customers in responding to **data subject requests**, including:

- access requests
- correction requests



- deletion requests
- data portability requests

As the Data Controller, the Customer remains responsible for responding to such requests.

9. Data Breach Notification

In the event of a personal data breach affecting Customer data, Qbil will:

- promptly investigate the incident
- take appropriate mitigation measures
- notify the Customer without undue delay
- provide relevant information to support regulatory notification obligations

10. Compliance and Certifications

Qbil Software B.V. maintains a strong commitment to security, privacy, and regulatory compliance.

Our security and compliance program includes:

- **ISO 27001 – Information Security**
- **ISO 27701 – Privacy Information Management**
- **NIS2 cybersecurity readiness**

These frameworks help ensure that personal data is processed securely and responsibly.

11. Contact

For questions regarding this Data Processing Addendum or data protection practices, please contact:

Qbil Software B.V.

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