

# DATA PROTECTION AGREEMENT (DPA)

*Version 2026.1 – Sovereign Compliance Edition*

This Data Protection Agreement ('DPA') is entered into by and between JustForms ('Processor') and the Client Organization ('Controller'). This DPA is incorporated into the Master Service Agreement and is designed to meet the requirements of the Maryland Online Data Privacy Act (MODPA) § 14-4601 et seq. and other applicable 2026 privacy regulations.

## 1. DEFINITIONS

- \* 'Sovereign Architecture': Refers to the Processor's 'Zero-Footprint' design where data is pulsed in-memory and immediately purged post-transmission.
- \* 'The Vault': The Controller-owned storage environment (BYOS) where finalized data is deposited.
- \* 'The Shredder': The automated 72-hour Time-to-Live (TTL) protocol for unsubmitted draft data.

## 2. SCOPE & PROCESSING

Processor shall process Personal Data only as strictly necessary to provide the 'AI-Guided Intake' service. Processor acts as a Data Processor for the duration of the 72-hour draft window. Once data is transmitted to the Controller's Vault, Processor's role as a holder of that data ceases.

## 3. TECHNICAL & ORGANIZATIONAL MEASURES (TOMs)

Processor guarantees the following 'A-Grade' security controls:

- \* Submit & Strip: 100% of User Input is programmatically stripped from Processor's database immediately upon successful transmission to the Controller's Vault.
- \* AI Isolation: Processor utilizes a 'Metadata-Only' AI pipeline. No personally identifiable information (PII) or sensitive data is transmitted to the Large Language Model (LLM).
- \* Encryption: All data in-transit is secured via TLS 1.3. All data at-rest (during the 72-hour window) is secured via AES-256 application-layer encryption.
- \* Zero Data Retention (ZDR): Processor utilizes Enterprise-tier AI endpoints with verified ZDR headers, ensuring no data is used for model training or logging.

## 4. CONTROLLER RIGHTS & MODPA COMPLIANCE

- \* Right to Portability: Processor provides a 'Machine-Readable' JSON export for all active drafts.
- \* Universal Opt-Out: Processor's system natively detects and respects Global Privacy Control (GPC) signals.
- \* Data Minimization: Processor enforces a 72-hour 'Strict Necessity' window for all draft data. Abandoned drafts are purged every 6 hours via automated CRON.

## 5. SUB-PROCESSOR RESTRICTIONS

Processor shall not engage any sub-processor (including AI providers) that does not provide a Zero Data Retention (ZDR) guarantee.

## 6. AUDIT RIGHTS

Controller has the right to request a 'Forensic Data Map' (generated by the internal Antigravity audit system) once per 12-month period to verify the 'Submit & Strip' logic is active.

Signed on this \_\_\_\_ day of \_\_\_\_\_, 2026.

Processor: Christopher Richard Morgan, CEO, JustForms

Controller: \_\_\_\_\_