

# Data Processing Addendum

2026-01-28 – India

## Schedule #1: Subject Matter and Details of Processing

### A. LIST OF PARTIES

#### Data importer(s):

<b>Name:</b>	Optel, as set out in the Agreement
<b>Address:</b>	As set out in the Agreement.
<b>Contact person's name, position and contact details:</b>	Louis Roy, president ( <a href="mailto:privacy@optelgroup.com">privacy@optelgroup.com</a> )
<b>Activities relevant to the data transferred under this DPA and SCCs:</b>	Use of the Cloud Services pursuant to the Agreement.
<b>Role (controller/processor):</b>	Processor, as determined by Data Protection Laws.

#### Data Exporter(s):

<b>Name:</b>	The <b>Client</b> , as set out in the Agreement.
<b>Address:</b>	As set out in the Agreement.
<b>Contact person's name, position and contact details:</b>	As set out in the Agreement.
<b>Activities relevant to the data transferred under this DPA and SCCs:</b>	Use of the Cloud Services pursuant to the Agreement.
<b>Role (controller/processor)</b>	Controller (or Data Fiduciary)

### B. DESCRIPTION OF TRANSFER

<b>Categories of data subjects whose personal data is transferred</b>	<p>Client may submit Personal Data to the Cloud Services the extent of which is determined and controlled by Client in its sole discretion, and which may include, but is not limited to Personal Data relating to the following categories of data subjects:</p> <ul style="list-style-type: none"><li>- Client's Users. Users may include, for example, Client's employees, consultants, contractors, advisors, suppliers, agents, and other third parties, as determined by the Client.</li><li>- Employees or contact persons of Client's prospects, customers, business partners, suppliers, and vendors.</li><li>- Employees, agents, advisors, freelancers of Client (who are natural persons).</li><li>- Prospects, customers, business partners, suppliers, and vendors of Clients (who are natural persons).</li></ul>
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<p><b>Categories of personal data transferred</b></p> <p>Content data</p> <p>Sensitive data</p>	<p>Client may submit Personal Data to the Cloud Services the extent of which is determined and controlled by Client in its sole discretion, and which may include, but is not limited to the following categories of Personal Data:</p> <p>IP address User ID Geolocation information</p> <p>Contact information (e.g., First and last name, title, position, employer, company, e-mail address, physical business address, phone number, employee number)</p> <p>No Sensitive Data</p>
<p><b>The frequency of the transfer (e.g. whether the data is transferred on a one-off or continuous basis).</b></p>	<p>The Personal Data will be transferred on a continuous basis depending on the use of the Cloud Services by the Client.</p>
<p><b>Nature of the processing</b></p>	<p>Performance of the Cloud Services pursuant to the Agreement (may include: Collection, recording, organization, structuring, storage, adaptation, consultation, use, disclosure, transfer of Personal Data).</p>
<p><b>Purpose(s) of the data transfer and further processing</b></p>	<p>Optel will only process Personal Data in the course of providing the Cloud Services, as specified in the Agreement.</p>
<p><b>The period for which the personal data will be retained, or, if that is not possible, the criteria used to determine that period</b></p>	<p>Optel will process Personal Data for the duration of the Agreement.</p>
<p><b>For transfers to (sub-) processors, also specify subject matter, nature and duration of the processing</b></p>	<p>Sub-Processors will process Personal Data, for the duration of the Agreement, in accordance with the Controller's instructions (may include: Collection, recording, organization, structuring, storage, adaptation, consultation, use, disclosure, transfer of Personal Data).</p>
<p><b>Competent Supervisory Authority</b></p>	<p>The Supervisory Authority specified in clause 13 of the SCC shall act as the competent supervisory authority or the <b>Data Protection Commission (DPC)</b>, 21 Fitzwilliam Square South, Dublin 2, D02 RD28, Ireland.</p>