DATA PROCESSING AGREEMENT (GDPR ARTICLE 28 DPA)

B2B technical compliance processing addendum for FacturLint (https://facturlint.com)

FacturLint | Version: 2026-11-26

1. Roles & Scope of Processing

- Customer acts as Data Controller for electronic invoices submitted via API, MCP or web workspace.
- FacturLint operator acts strictly as Data Processor executing automated compliance, repair and conv...
- Categories of personal data potentially contained in invoices: billing contact names, business addr...

2. 100% In-Memory Stateless Architecture (Zero Disk Retention)

- All PDF/A-3b, XML, FEC, DATEV and Stripe Bridge processing runs exclusively in volatile memory (RAM).
- No invoice PDF, structured XML, party name, address or monetary amount is ever persisted to disk or...
- Only anonymous technical telemetry (document SHA-256 digest, format, compliance status, latency) is...

3. Technical & Organizational Security Measures (GDPR Art. 32)

- TLS 1.3 transport encryption; Stripe and outbound webhook secrets encrypted at rest using Encrypt-t...
- API tokens and web sessions stored as one-way SHA-256 hashes; client IP addresses hashed (30-day ro...

4. Authorized Sub-Processors

- Cloudflare, Inc. — TLS edge proxy, CDN caching and DDoS mitigation.
- Polar Software Inc. — Merchant of Record (B2B billing, VAT/tax handling and subscription lifecycle).
- Resend, Inc. — Transactional email delivery (passwordless Magic Links and optional Stripe Bridge de...

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