

# Data Processing Addendum

Legal & compliance · draft for counsel review

---

**\*\*Draft for counsel review — not legal advice.\*\*** This Addendum describes the controller/processor terms intended to apply when Smart Buildings Inc. processes personal data on behalf of a building operator. It must be reviewed and finalized by qualified counsel before reliance.

*Last updated: draft. Governing law: Ontario, Canada.*

## Roles

The building **operator is the controller** of personal data processed through **Smart Buildings Inc is the processor**, acting only on documented instructions from the controller, except where law requires otherwise.

## Scope of processing

- **Subject matter:** operation of the ATLAS OS platform for the operator's building(s).
- **Data types:** operator account data; building telemetry; privacy-by-design presence (WiFi-CSI, no cameras) and, where enabled, clinic vital-sign estimates.
- **Data subjects:** operators, staff, and residents of the deployed building.

## Processor obligations

We will: (a) process personal data only on the controller's instructions; (b) ensure persons authorized to process are bound by confidentiality; (c) implement appropriate technical and organizational security measures; (d) assist the controller with data-subject requests and with its obligations under applicable law; and (e) delete or return personal data at the end of the engagement.

## Subprocessors

The controller authorizes the use of vetted subprocessors (e.g., hosting and database providers) under written terms no less protective than this Addendum. We will maintain a current subprocessor list and give notice of intended changes.

## Security

Security measures include access controls, encryption in transit, least-privilege administration, and logging. The platform's local-first design limits the personal data that must leave the building.

## Personal health information

Where a deployment processes health-related signals, we apply **PHIPA**-aligned safeguards and process such information solely as the controller's agent, subject to resident consent obtained by the controller.

## Breach notification

We will notify the controller without undue delay after becoming aware of a

personal-data breach and provide information reasonably needed for the controller's own notification obligations.

## International transfers

Personal data is processed in Canada by default. Any cross-border processing will be subject to safeguards consistent with PIPEDA and applicable provincial law.

## Term

This Addendum applies for the duration of the processing and survives until all personal data is deleted or returned.

## Contact

Data-protection questions: **dpo@smartbuildings.example** (placeholder — replace with the official contact before publication).







