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ANNEX I TO THE DPA - SUBJECT MATTER OF THE PROCESSING

AIKIT RESEARCH, S.A.

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This Annex I forms an inseparable part of the Data Processing Agreement (DPA) entered into between the Client (Controller) and AIKIT RESEARCH, S.A. (Processor), and sets out the elements required by Article 28.3 of Regulation (EU) 2016/679 (GDPR).

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1. SUBJECT MATTER

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The purpose of the processing is the provision of the generative artificial intelligence services contracted by the Client, consisting of the processing of the personal data that the Client, its authorized users or its data subjects submit to the platform of AIKIT RESEARCH, S.A., for the sole purpose of performing the functionalities of the service.

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2. DURATION

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The processing shall continue for the entire term of the main contract between the parties and for such time as is strictly necessary to complete the return or deletion of data in accordance with the DPA. The maximum retention period following termination of the contract shall not exceed thirty (30) calendar days, save where retention is required by law.

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3. NATURE AND PURPOSE

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3.1. Nature

The processing comprises, depending on the functionalities activated and the use the Client makes of the platform:

- (a) Collection and storage of the Inputs submitted by the Client and its authorized users (prompts, attachments, uploaded content).
- (b) Processing of the Inputs by the enabled artificial intelligence models, including those of technology providers acting as sub-processors in accordance with Annex II, for the generation of the Outputs.
- (c) Temporary or persistent storage, depending on the configuration, of the generated Outputs.
- (d) Management of user accounts, access rights and activity logs necessary for the secure operation of the service.
- (e) Technical support in the event of incidents, where requested by the Client.

3.2. Purpose

The sole and exclusive purpose is to provide the Client with the contracted services. AIKIT RESEARCH, S.A. shall NOT use the Client's personal data, the Inputs or the Outputs to train its own or third-party artificial intelligence models, nor for any purpose other than that strictly necessary to perform the service.

4. TYPE OF PERSONAL DATA

The categories of personal data processed may include, depending on the use the Client makes of the service:

- (a) Identification data: first name, surname, email address, account identifiers.
- (b) Professional contact data: organization, position, telephone.
- (c) Technical and usage data: IP address, device identifier, activity logs, timestamps.
- (d) Any personal data contained in the Inputs or Outputs submitted or generated by the Client and its authorized users.

The Client, as Controller, is the party that determines the specific categories of personal data it introduces into the platform and declares that it has the legal basis and the consents necessary for their processing.

5. CATEGORIES OF DATA SUBJECTS

The categories of natural persons whose data may be processed include, depending on the use the Client makes of the service:

- (a) Employees, collaborators and other personnel of the Client.
- (b) End customers, users or recipients of the Client's services.
- (c) Suppliers, business contacts and third parties with whom the Client maintains a relationship.
- (d) Any other categories of data subjects whose data are introduced into the platform by the Client.

6. OBLIGATIONS AND RIGHTS OF THE CONTROLLER

The Client, as Controller, retains the full set of obligations and rights conferred on it by the GDPR, in particular:

- (a) To determine the purposes and means of the processing within the scope of the service.
- (b) To ensure the lawfulness of the processing (Arts. 6 and 9 GDPR) and, where applicable, the provision of information to data subjects (Arts. 13 and 14 GDPR).
- (c) To handle the exercise of data subjects' rights (Arts. 12 to 22 GDPR), and may request the assistance of the Processor in accordance with the DPA.
- (d) To notify the competent supervisory authority and, where applicable, the data subjects, of personal data breaches in accordance with Arts. 33 and 34 GDPR, on the basis of the information provided by the Processor.
- (e) To carry out impact assessments (Art. 35 GDPR) and prior consultations (Art. 36 GDPR) where these are mandatory.

CONTACT

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End of document - Annex I to the DPA: Subject Matter of the Processing