

DATA PROCESSING AGREEMENT

This Data Processing Agreement ("DPA") is between the customer identified below ("Customer") and **OwnerRez, Inc.**, 1603 Capitol Ave Suite 415 #81829, Cheyenne, WY 82001 ("OwnerRez"), and is incorporated into the OwnerRez Terms of Service. It applies where OwnerRez processes personal data on Customer's behalf.

1. Roles

Customer is the data controller. OwnerRez is the data processor, processing personal data only to provide the OwnerRez platform and services, and only on Customer's instructions or actions derived or inferred from Customer's previous instructions.

2. Confidentiality and Security

OwnerRez will keep personal data confidential and will implement appropriate technical and organizational measures to protect it against unauthorized access, loss, or disclosure. OwnerRez personnel with access to personal data are bound by confidentiality obligations.

3. Sub-processors

Customer authorizes OwnerRez to engage sub-processors (including cloud hosting, payment processing, and email delivery providers) to assist in providing the services. OwnerRez will impose data protection obligations on sub-processors no less protective than those in this DPA and will notify Customer at least 30 days before adding or replacing a sub-processor.

4. Data Subject Rights

OwnerRez will promptly notify Customer of any data subject request (such as a request for access, correction, or deletion) and will provide reasonable assistance to help Customer respond. Customer is responsible for responding to such requests.

5. Security Incidents

OwnerRez will notify Customer within 72 hours of becoming aware of a confirmed personal data breach affecting Customer's data, and will provide available information about the nature, scope, and likely consequences of the breach.

6. Deletion

Upon termination of the Agreement, OwnerRez will, at Customer's election, delete or return Customer's personal data within a reasonable time, except where retention is required by applicable law.

7. International Transfers

Personal data is processed on servers in the United States. For transfers of personal data from the EU/EEA to the US, the parties incorporate by reference the Standard Contractual Clauses (Module 2: Controller to Processor) adopted by the European Commission on June 4, 2021 (available at <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32021D0914>). In the event of conflict between this DPA and the SCCs, the SCCs prevail.

8. Liability and Governing Law

Each party's liability under this DPA is subject to the limitations in the Agreement. This DPA is governed by the same law as the Agreement.

EXHIBIT A - Details of Processing

Subject Matter	Processing of personal data in connection with Customer's use of the OwnerRez vacation rental software platform.
Duration	For the term of the Agreement, and as necessary thereafter to comply with applicable law.
Nature and Purpose	Storage, retrieval, organization, and transmission of personal data to provide booking management, channel management, messaging, payment processing, and reporting features of the OwnerRez platform.
Types of Personal Data	Names, email addresses, phone numbers, postal addresses, payment card data (encrypted), booking and reservation details, rental agreement data, and guest communications.
Categories Data Subjects	Guests and prospective guests of Customer's vacation rental properties; property owners; Customer's authorized platform users.

IN WITNESS WHEREOF, the Parties have demonstrated their agreement by duly affixing their signatures below. Agreed as of the latest date below:

For OwnerRez, Inc.

For Customer

Signature

Signature

Date

Date