



# RTBL Data Processing Addendum

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**This document is provided as a general template for RTBL operations and member onboarding. It is not legal advice. A qualified lawyer should review and localize it before public launch or enforcement.**

This template addendum describes data processing roles for RTBL services. It should be customized for the RTBL operator and applicable privacy laws before launch.

## 1. Roles

For member application and registry services, RTBL may act as an independent controller for account, billing, verification, safety, and registry data. For special enterprise services, the order form may define processor/controller roles separately.

## 2. Processing Details

### Subject matter may include:

- Applications and renewals
- Verification and registry publication
- Support, complaints, and abuse review
- Payment and invoice records
- Website security and analytics

## 3. Security Measures

### RTBL should maintain:

- Access controls
- Encryption in transit
- Limited staff access
- Backups and audit logs where appropriate
- Vendor review for hosting, payment, email, and analytics

## 4. Subprocessors

RTBL may use hosting, payment, email, analytics, customer support, security, and document providers. The operator should list production subprocessors before launch.

## 5. International Transfers

The RTBL operator should add applicable transfer mechanisms, data residency commitments, and regional privacy terms before launch.