Pre-Validate App Data Processing Agreement

Version 1.3 · Last updated: 31 October 2026

This DPA has two parts: (1) the Key Terms on this Cover Page and (2) the Common Paper DPA Standard Terms Version 1.1 ("DPA Standard Terms"), incorporated by reference. If there is any inconsistency, this Cover Page controls over the DPA Standard Terms. Capitalised words have the meanings given on this Cover Page, the DPA Standard Terms or the Agreement. If this Cover Page omits or does not define a term, its meaning is "none" or "not applicable".

Acceptance: This DPA forms part of the Agreement. It applies automatically when Customer accepts the Pre-Validate App Terms of Service, and continues for as long as TradeSun processes Customer Personal Data. No separate signature is needed.

Key Terms

- **Agreement:** This DPA supplements the Pre-Validate App Terms of Service between TradeSun Inc. and Customer, effective on the date Customer accepts them.
- **Approved Subprocessors:** Amazon Web Services, Inc. (USA): hosting, storage and sign-in. Microsoft Corporation (USA): email and support (Microsoft 365). Google LLC (USA): document analysis using Gemini models, when needed to improve extraction accuracy.
- **Provider Security Contact:** legal@tradesun.com
- **Security Policy:** As defined in the Agreement.

Restricted Transfers

- **Governing Member State:** EEA transfers: Ireland. UK transfers: England and Wales.

Annex I(A) List of Parties

Data Exporter

- Name: Customer, as identified in its account
- Address and contact person: as provided in Customer's account
- Activities relevant to transfer: see Annex I(B)
- Role: Controller or Processor, as applicable to Customer's use of the Service

Data Importer

- Name: TradeSun Inc.
- Address: 2196 Carmel Valley Road, Del Mar, CA 92014, USA
- Contact person: Andrew Hook, Data Protection Lead, legal@tradesun.com
- Activities relevant to transfer: see Annex I(B)
- Role: Processor

Annex I(B) Description of Processing

- **Service:** The Pre-Validate App (pre-validate.tradesun.ai), TradeSun's Astra®-powered service for checking trade documents, as made available by Provider from time to time.
- **Categories of Data Subjects:** Individuals named in trade documents uploaded by Customer, including: Customer's employees and representatives (e.g. signatories); employees, representatives and signatories of Customer's suppliers, buyers, carriers, freight forwarders, agents, banks and other trading partners; and sole traders acting in those roles.
- **Categories of Personal Data:** Names, job titles and roles; signatures; business contact details (email, phone, postal address); bank account and payment details appearing in trade documents; identification numbers where they appear in documents; transactional information relating to shipments.
- **Special Category Data:** No.
- **Frequency of Transfer:** Continuous.
- **Nature and Purpose of Processing:** Provider will Process Customer Personal Data as instructed in Section 2.3 of the DPA Standard Terms. The nature of processing includes: receiving and storing documents; analysing them to extract data and identify discrepancies (automated processing); protecting data; sharing with Approved Subprocessors to provide the Service; and deleting data. Provider may use documents uploaded by Customer to train and improve TradeSun's own Astra® models, to improve accuracy, consistency and fraud detection, unless Customer opts out by emailing dataprotection@tradesun.com. Before any training, the data is aggregated and Customer Personal Data is removed or de-identified, so Customer Personal Data is not used to train models. Documents are never used to train general-purpose AI models, and Approved Subprocessors may not use Customer Personal Data to train their own models.
- **Duration of Processing:** Provider will process Customer Personal Data as long as required (i) to conduct the Processing activities instructed in Section 2.2(a)–(d) of the DPA Standard Terms; or (ii) by Applicable Laws.

Annex I(C) Competent Supervisory Authority

The supervisory authority of the data exporter, as determined under Clause 13 of the EEA SCCs or the relevant provision of the UK Addendum.

Annex II Technical and Organisational Security Measures

See Security Policy. In addition:

- **Protecting data in transit:** Customer Personal Data is encrypted in transit using TLS.
- **Physical security and hosting:** the Service is hosted on Amazon Web Services, relying on AWS's physical and environmental security controls.
- **User identification and authorisation:** users authenticate through AWS Cognito with password protection.

- **Access control:** access to Customer Personal Data is restricted to authorised TradeSun personnel who need it to provide the Service.
- **Limited data retention:** Customer Personal Data is retained and deleted in line with the retention periods in TradeSun's Privacy Policy.

Attribution

Based on the Common Paper Data Processing Agreement (Version 1.1), free to use under CC BY 4.0.