

Data processing / APP schedule

WW-DPA · 2026.2-draft · effective 21 August 2026 · review quarterly

DRAFT — not legal advice — not counsel-reviewed. Early-access copy for Workshop Wrench. Do not treat this as a GA customer contract. The legal entity ABN is not yet recorded; party blocks are SPECIMEN.

Roles

For shop customer and vehicle data, you are the APP entity. We process that data to provide the SaaS (processor). For owner accounts, billing emails, and demo-request leads, we determine purposes (APP entity). This is not a GDPR adequacy statement.

Australian Privacy Principles — mapping (draft)

APP	How this draft treats it
1 Open and transparent	This DPA + privacy policy + sub-processors page
2 Anonymity	Shop software requires identity for jobs; marketing forms need a work email
3 Collection	Only what the module needs; APP 5 notice is a planned shop form
5 Notice	Privacy policy; portal and book copy expand in Wave B
6 Use/disclosure	To provide the service, subprocessors, legal requirement
7 Direct marketing	Spam Act consent; commercial vs transactional split
8 Cross-border	Cloudflare edge is global; GCP Sydney is intended, not evidenced
11 Security	TLS in production intent, tenant isolation, secrets not in git
12 Access	N73 JSON export — not a certified DSAR programme
13 Correction	In-app edit of customer/vehicle; no separate portal yet

Residency

We do **not** claim that data is hosted in Australia today. Local/dev uses Docker on the operator’s machine. Cloud path targets GCP australia-southeast1 after a named staging project exists.

Sub-processors

See the sub-processors exhibit. Cloudflare already processes marketing/demo-lead data. Google Cloud, Stripe, Twilio/SMS, and SMTP become processors only when keys and a project exist.

Breach

Eligible data breaches under the NDB scheme are the APP entity’s assessment. We will notify the tenant owner email without undue delay after we confirm a breach of our systems affecting that tenant. This

sentence is process intent, not a certified IR playbook.

Templates assist workflows. They are not legal advice, not a government form, and not a certification. Counsel must review before paying tenants or public compliance claims.

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