

# Northbridge — Data Processing Addendum

Policy Owner	Vendors
Effective Date	2025-08-01
Revision	1.0
Classification	Internal Use Only
Applies To	All Employees, Contractors, and Vendors

## 1. Purpose

This document establishes Northbridge standards for data processing addendum, enabling consistent execution, compliance, and risk reduction.

## 2. Scope

This policy/procedure applies to all Northbridge personnel, systems, and third parties involved in the activities covered herein.

## 3. Roles & Responsibilities

- Policy Owner: accountable for stewardship and annual review.
- IT/Security: implements controls, monitors compliance, and reports deviations.
- Managers: enforce requirements within their teams.
- Employees/Contractors: follow procedures and report issues immediately.

## 4. Requirements & Procedures

- Processor obligations: confidentiality, security, sub-processor approvals.
- Data subject rights support, deletion/return upon termination.
- Breach notification timeline and cooperation duties.
- Cross-border transfer mechanisms and audit rights.

## 5. Compliance & Exceptions

Exceptions must be documented with compensating controls and approved by the Information Technology Director. Non-compliance may result in disciplinary action.

## 6. Review & Maintenance

This document is reviewed annually and upon material change in risk, technology, or regulation.