Annex IV – Cross-Border Safeguards

This Annex forms part of the Data Processing Agreement (DPA) between Rizer Inc. ("Processor") and the Customer ("Controller/Business").

When Customer Data is transferred outside the **European Economic Area (EEA), the United Kingdom (UK), or Switzerland**, Rizer and its sub-processors implement lawful transfer mechanisms to ensure adequate protection of personal data in line with **Chapter V of the GDPR**, the **UK GDPR**, and the **Swiss Federal Act on Data Protection (FADP)**.

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1. Standard Contractual Clauses (SCCs)

- For transfers to countries without an adequacy decision, Rizer and its sub-processors rely on the **European Commission's Standard Contractual Clauses (2021/914/EU)**.

- Where applicable, the **UK Addendum** (issued by the UK ICO) and the **Swiss Add-On** (per FDPIC guidance) are incorporated.

- These SCCs form part of this DPA by reference.

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2. EU–US / UK–US / Swiss–US Data Privacy Framework (DPF)

- Certain sub-processors (e.g., **OpenAI, Google, Anthropic**) participate in the **Data Privacy Framework (DPF)**.

- Transfers to these entities are covered under their certified adherence to the EU–US, UK–US, and Swiss–US DPF.

- Where DPF participation lapses, SCCs will apply as fallback.

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3. Supplementary Safeguards

In addition to SCCs/DPF, Rizer implements supplementary measures as recommended by the **European Data Protection Board (EDPB)**, including:

- Encryption of Customer Data in transit and at rest.

- Role-based access controls and MFA.

- Limited data minimization before transfer to AI sub-processors (e.g., contextual deal/contact data without unnecessary identifiers).

- Vendor risk assessments and continuous monitoring of sub-processor compliance.

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4. Customer Rights & Information

- Customers may request details of the specific transfer mechanism applicable to their data by contacting privacy@rizer.io.

- Rizer will provide a copy of the relevant SCCs or evidence of DPF participation upon request (subject to confidentiality).

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5. Updates to Transfer Mechanisms

- If transfer mechanisms are invalidated or replaced (e.g., due to changes in law), Rizer will promptly implement alternative lawful mechanisms.

- Customers will be notified of material updates to this Annex.