



Data Processing Agreement (DPA - Art. 28 GDPR) — Slonto

Template based on the CNIL official “Sub-processor Agreement” model. This does not constitute legal advice. Have it reviewed by a lawyer before any contractual commitment. Version: 23/09/2026

Slonto = Processor. **Creator** (owner of a team / space) = Controller for their students’ data.

1. Subject & duration

Processing by Slonto of student data enrolled in a creator’s courses (courses, quizzes, flashcards, SRS, community, Stripe payment, Brevo emails, Bunny/DO Spaces video). Duration: as long as the team exists.

2. Nature & purpose

Hosting, delivery and learning tracking: student accounts, enrollments, progress, quizzes, flashcards/SRS, pseudonymized community, payment (Stripe Connect Standard, Slonto never stores card data), video, cookies.

3. Categories of data & data subjects

Category	Examples
Student identity	name, email
Auth & security	hashed password, encrypted 2FA, IP
Learning	enrollments, progress, quiz scores, SRS
Pseudonymized community	pseudonym, posts, avatar (show_real_name opt-in)
Transactional	orders (anonymized on deletion)
Technical	cookie consent, video usage

Data subjects: enrolled students. No Art.9 sensitive data by default.

4. Processor obligations (Slonto)

- Process only on documented creator instructions
- Confidentiality + access control per team
- Security Art.32: encryption, isolation, pseudonymization
- Breach notification within 48h
- Assistance for data subject rights (export / erasure)
- DPIA assistance, audit on request

5. Sub-processors

Sub-processor	Role	Non-EU safeguard
Stripe	Payment Connect Standard	SCC EU-US
Brevo	Transactional emails	SCC
Bunny Stream/CDN	Video	SCC

DigitalOcean Spaces	Media storage	EU ams3
Slonto host	Infrastructure	Host DPA, EU

6. Transfers outside EU

Governed by EU Commission Standard Contractual Clauses (SCC).

7. Fate of data at end of contract

Return (JSON export) or deletion (30 days). Anonymized orders kept 10 years (accounting). Cookie IPs deleted after 365 days.

8. Controller obligations (Creator)

- Provide lawful instructions
- Inform students (mention in their T&Cs available at `/team/cgv`, or failing that in Slonto's global T&Cs) that Slonto acts as processor
- Lawful basis (student contract)
- Exercise rights via Slonto tools

9. Electronic signature

By creating a team and accepting the Terms (`/en/terms`), the creator signs electronically. Checkbox = signature. Timestamp: `teams.created_at + user_id`.

10-12. Term, governing law, CNIL annex

French law. CNIL template: `cnil.fr` — Register docs/GDPR-REGISTER.md