

Data Processing Agreement (DPA)

pursuant to Art. 28 GDPR
sallsa.ai - JT holding GmbH
Effective: March 16, 2026

1. Subject Matter and Duration

This DPA governs the processing of personal data by JT holding GmbH (Processor) on behalf of the Platform user (Controller). It enters into force upon acceptance of the Terms of Service.

2. Nature and Purpose of Processing

- Automation of B2B outreach via LinkedIn
- AI-powered personalization of messages
- Management of connection requests and message histories
- Lead qualification and prioritization

3. Categories of Data Subjects and Data

Data subjects: Business contacts (leads) of the Controller on LinkedIn

Data categories (data minimization):

- LinkedIn profile ID and link
- Profile photo
- Public posts, comments, likes
- Message history

Not stored: Email and phone (on-demand via Apollo.io, not cached).

4. Retention Periods

- Maximum: 90 days
- Automatic deletion after 60 days without acceptance
- Active communication: duration of business relationship
- Opt-out: immediate deletion (LinkedIn URL in blocklist)

5. Obligations of the Processor

- Process data only on documented instructions
- Ensure confidentiality of all authorized persons
- Implement appropriate TOMs (see Section 8)
- Assist Controller in fulfilling data subject rights
- Delete or return all data upon termination
- Demonstrate compliance upon request

6. Sub-processors

General authorization granted. 30 days advance notice for changes. Controller may object.

Sub-processor	Location	Purpose
Supabase Inc.	Frankfurt, DE	Database hosting
Unipile SAS	EU	LinkedIn API integration
Apollo.io Inc.	USA (SCCs)	On-demand lead data
Anthropic PBC	USA (SCCs)	AI text processing
Hostinger Int.	EU (Lithuania)	Server infrastructure

7. Data Breach Notification

Notification to Controller within 48 hours. Controller notifies supervisory authority within 72 hours (Art. 33 GDPR).

8. Technical and Organizational Measures (TOMs)

- Encryption: TLS 1.2+ (transit), AES-256 (at rest)
- Access control: RBAC (role-based)
- Row-Level Security (RLS) for multi-tenant isolation
- Automatic backups (7-day retention)
- Monitoring and logging of access
- Confidentiality obligations for all personnel

9. International Data Transfers

Transfers to third countries (USA) exclusively on the basis of EU Standard Contractual Clauses (SCCs) pursuant to Art. 46(2)(c) GDPR.

10. Governing Law

Austrian law. Exclusive jurisdiction: Innsbruck, Austria.

JT holding GmbH
Thierseestr. 15d, 6330 Kufstein, Austria
FN 593407h | ATU78831025
legal@sallsa.ai