

Data Processing Clarification Statement

2BrightSparks Pte Ltd

Date	[Date]
To	[Customer Organisation]
Re	Clarification of Data Processing Relationship — SyncBackPro

Dear [Name],

Thank you for your enquiry regarding the data processing relationship between 2BrightSparks Pte Ltd and your organisation in connection with SyncBackPro. This letter provides a formal clarification.

1. Nature of SyncBackPro

SyncBackPro is a **locally installed Windows desktop application** that performs backup, synchronisation, and restore operations. The software is downloaded, installed, and operated entirely within the customer's own IT environment. There is no cloud component, hosted service, or remote processing capability.

2. Data Processing Clarification

2BrightSparks Pte Ltd hereby confirms the following:

- **2BrightSparks does not process personal data** on behalf of customers. We have no access to, visibility of, or control over any data handled by SyncBackPro within the customer's environment.
- **2BrightSparks is not a data processor** as defined under Article 4(8) of the EU General Data Protection Regulation (GDPR), the UK GDPR, or equivalent provisions in other data protection legislation.
- **No Data Processing Agreement (DPA) is required** or applicable, as the conditions for a controller-processor relationship under Article 28 GDPR are not met. 2BrightSparks does not process personal data on the customer's behalf, on the customer's instructions, or for any purpose connected with the customer's data.
- **2BrightSparks is not a sub-processor** and does not engage sub-processors in connection with SyncBackPro, as there is no data processing to delegate.
- **SyncBackPro does not transmit any data to 2BrightSparks.** The only optional network communication is an update version check, which transmits only the current software version number. No customer data, telemetry, usage analytics, filenames, or configuration information is transmitted.

3. Customer's Data Responsibilities

As the sole controller of any personal data processed by SyncBackPro, the customer is responsible for ensuring that the software is configured and operated in compliance with applicable data protection regulations, including the security of the environment in which SyncBackPro operates, encryption of data at rest and in transit, access controls, and data retention and deletion policies.

4. Limited Data Held by 2BrightSparks

The only personal data held by 2BrightSparks in connection with SyncBackPro customers is licence registration information (name, email address) and any support communications voluntarily submitted. This data is processed by 2BrightSparks as a data controller in its own right, subject to our Privacy Policy (www.2brightsparks.com/privacy.html).

5. Regulatory Applicability

This clarification applies equally to the following regulatory frameworks, under all of which 2BrightSparks' role as a software licensor (rather than a data processor) means that processor-specific obligations are not applicable:

- EU General Data Protection Regulation (GDPR)
- UK General Data Protection Regulation (UK GDPR)
- California Consumer Privacy Act (CCPA) / California Privacy Rights Act (CPRA)
- Health Insurance Portability and Accountability Act (HIPAA)
- Any other data protection legislation requiring a controller-processor agreement

This statement may be relied upon by your organisation for procurement, compliance, and audit purposes. If you require further clarification, please do not hesitate to contact us.

Yours sincerely,

[Name]

[Title]

2BrightSparks Pte Ltd

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