

CONTROLLED DOCUMENT

DPA clause-coverage evidence report

European Union. Rule pack 2026-07-31.2. Generated 7 August 2026 at 13:00.

Document control

Field	Value
Organisation	Example Rhein Services GmbH
Document type	DPA clause-coverage evidence report
Document reference	DPA-EU-2026-017
Jurisdiction	European Union
Version	2.1
Status	Final
Classification	Confidential contract review record
Prepared by	Data Protection Lead
Prepared on	7 August 2026
Rule pack	2026-07-31.2
Sources reviewed	31 July 2026
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Agreement and review record

Field	Value
Agreement reference	DPA-EU-2026-017
Controller	Example Rhein Services GmbH
Processor	Example Cloud Operations S.A.
Version	2.1
Agreement date	30 July 2026
Reviewer	Data Protection Lead
Review status	Final

Input and method

File: example-rhein-controller-processor-agreement.docx (2 KB). SHA-256: 064f21304d6c07cd0b8e261ac2400f4e9f1c0bb436b14eaf1dfa6cbccee4f1d0.

Extracted text: 14 segments and 2539 characters.

English text was extracted. Each status is based only on explicit, deterministic phrase coverage in that text.

This is deterministic clause-subject coverage. It does not interpret the agreement or determine legal adequacy, validity or enforceability.

Result summary

This report is Final. All required agreement identity fields and manual finding decisions were recorded.

Field	Value
Review status	Final
Found	15
Not found	0
Uncertain	1
Conflicting	0
Not assessable	0
Manual reviews complete	1 of 1

Subject matter - Found

Article 28(3). The agreement describes the subject matter of the processing.

All 1 configured phrase groups were found together in the quoted passage.

Matched evidence tests: subject matter.

Missing evidence tests: none.

Evidence 1. Paragraphs 1-2. coverage.

Exact extracted excerpt: “subject matter of the processing is customer support and account administration. The duration of processing is the term of this agreement. The nature of the processing operations includes collection, storage, retrieval and deletion. The purpose of the processing is to provide the contracted support service. The”

Source IDs: EU-GDPR-28, EU-EDPB-ROLES, EU-SCC-2021-915.

Duration of processing - Found

Article 28(3). The agreement states how long the processing will continue.

All 1 configured phrase groups were found together in the quoted passage.

Matched evidence tests: duration.

Missing evidence tests: none.

Evidence 1. Paragraphs 1-2. coverage.

Exact extracted excerpt: “subject matter of the processing is customer support and account administration. The duration of processing is the term of this agreement. The nature of the processing operations includes collection, storage, retrieval and deletion. The purpose of the processing is to provide the contracted support service. The”

Source IDs: EU-GDPR-28, EU-EDPB-ROLES, EU-SCC-2021-915.

Nature and purpose - Found

Article 28(3). The agreement describes both the nature and the purpose of the processing.

All 2 configured phrase groups were found together in the quoted passage.

Matched evidence tests: nature, purpose.

Missing evidence tests: none.

Evidence 1. Paragraphs 1-2. coverage.

Exact extracted excerpt: “support and account administration. The duration of processing is the term of this agreement. The nature of the processing operations includes collection, storage, retrieval and deletion. The purpose of the processing is to provide the contracted support service. The types of personal data include names,”

Source IDs: EU-GDPR-28, EU-EDPB-ROLES, EU-SCC-2021-915.

Types of personal data - Found

Article 28(3). The agreement identifies the types of personal data processed.

All 2 configured phrase groups were found together in the quoted passage.

Matched evidence tests: data types, examples or schedule.

Missing evidence tests: none.

Evidence 1. Paragraphs 1-2. coverage.

Exact extracted excerpt: “storage, retrieval and deletion. The purpose of the processing is to provide the contracted support service. The types of personal data include names, contact details and account identifiers. The categories of data subjects include customers and authorised users. The controller’s rights and obligations are”

Source IDs: EU-GDPR-28, EU-EDPB-ROLES, EU-SCC-2021-915.

Categories of data subjects - Found

Article 28(3). The agreement identifies the categories of people whose data is processed.

All 2 configured phrase groups were found together in the quoted passage.

Matched evidence tests: data subjects, examples or schedule.

Missing evidence tests: none.

Evidence 1. Paragraphs 1-2. coverage.

Exact extracted excerpt: “storage, retrieval and deletion. The purpose of the processing is to provide the contracted support service. The types of personal data include names, contact details and account identifiers. The categories of data subjects include customers and authorised users. The controller’s rights and obligations are”

Source IDs: EU-GDPR-28, EU-EDPB-ROLES, EU-SCC-2021-915.

Controller rights and obligations - Found

Article 28(3). The agreement sets out the controller’s rights and obligations.

All 3 configured phrase groups were found together in the quoted passage.

Matched evidence tests: controller, rights, obligations.

Missing evidence tests: none.

Evidence 1. Paragraphs 1-2. coverage.

Exact extracted excerpt: “storage, retrieval and deletion. The purpose of the processing is to provide the contracted support service. The types of personal data include names, contact details and account identifiers. The categories of data subjects include customers and authorised users. The controller’s rights and obligations are”

Source IDs: EU-GDPR-28, EU-EDPB-ROLES, EU-SCC-2021-915.

Documented instructions - Found

Article 28(3)(a). The processor is limited to the controller’s documented instructions, including for transfers.

All 3 configured phrase groups were found together in the quoted passage.

Matched evidence tests: processor action, documented instructions, controller or transfer.

Missing evidence tests: none.

Evidence 1. Paragraphs 3-4. coverage.

Exact extracted excerpt: “DOCUMENTED INSTRUCTIONS

The processor shall only process personal data on the documented instructions of the controller, including any transfer of personal data. If processing is required by applicable law, the processor shall inform the controller before processing unless such law prohibits that notice.”

Source IDs: EU-GDPR-28, EU-EDPB-ROLES, EU-SCC-2021-915.

Mandatory-law exception and notice - Found

Article 28(3)(a). If Union or Member State law requires other processing, the processor informs the controller before processing unless the law prohibits notice.

All 3 configured phrase groups were found together in the quoted passage.

Matched evidence tests: legal requirement, advance notice, prohibition exception.

Missing evidence tests: none.

Evidence 1. Paragraphs 3-4. coverage.

Exact extracted excerpt: “DOCUMENTED INSTRUCTIONS

The processor shall only process personal data on the documented instructions of the controller, including any transfer of personal data. If processing is required by applicable law, the processor shall inform the controller before processing unless such law prohibits that notice.”

Source IDs: EU-GDPR-28, EU-EDPB-ROLES, EU-SCC-2021-915.

Confidentiality - Found

Article 28(3)(b). People authorised to process the data are committed to confidentiality or an appropriate statutory duty.

All 2 configured phrase groups were found together in the quoted passage.

Matched evidence tests: authorised people, confidentiality duty.

Missing evidence tests: none.

Evidence 1. Paragraphs 5-6. coverage.

Exact extracted excerpt: “CONFIDENTIALITY AND SECURITY

Persons authorised to process the personal data are bound by an appropriate duty of confidentiality. The processor shall implement appropriate technical and organisational measures required for the security of processing under Article 32, including measures supporting confidentiality, integrity and availability.”

Source IDs: EU-GDPR-28, EU-EDPB-ROLES, EU-SCC-2021-915.

Security measures - Found

Article 28(3)(c); Article 32. The processor must apply the security measures required by Article 32.

All 3 configured phrase groups were found together in the quoted passage.

Matched evidence tests: processor duty, security measures, Article 32 or security outcome.

Missing evidence tests: none.

Evidence 1. Paragraphs 5-6. coverage.

Exact extracted excerpt: “CONFIDENTIALITY AND SECURITY

Persons authorised to process the personal data are bound by an appropriate duty of confidentiality. The processor shall implement appropriate technical and organisational measures required for the security of processing under Article 32, including measures supporting confidentiality, integrity and availability.”

Source IDs: EU-GDPR-28, EU-EDPB-ROLES, EU-SCC-2021-915.

Sub-processors - Uncertain

Article 28(2), 28(3)(d) and 28(4). Sub-processors require prior written authorisation, change notice and a chance to object; equivalent obligations flow down and the processor remains liable.

3 of 4 configured phrase groups were found together. The wording needs human review.

Matched evidence tests: change notice and objection, flow-down, liability.

Missing evidence tests: authorisation.

Evidence 1. Paragraphs 7-8. partial.

Exact extracted excerpt: “not appoint a sub-processor without prior general written authorisation. The processor shall give notice of any new or replacement sub-processors and give the controller an opportunity to object. The sub-processor shall enter a written agreement imposing the same data protection obligations. The processor”

Manual decision: Confirmed covered after review.

Reviewer note: The complete clause and its defined terms were reviewed in the source agreement..

Source IDs: EU-GDPR-28, EU-EDPB-ROLES, EU-SCC-2021-915.

Data-subject rights assistance - Found

Article 28(3)(e). The processor assists the controller, where possible, with requests under Chapter III.

All 3 configured phrase groups were found together in the quoted passage.

Matched evidence tests: assistance, rights requests, measures or feasibility.

Missing evidence tests: none.

Evidence 1. Paragraphs 9-10. coverage.

Exact extracted excerpt: “shall assist the controller, insofar as possible, with data subject requests and the exercise of rights under Chapter III. Taking into account the nature of the processing and information available to the processor, the processor shall assist the controller with personal data breach obligations, data protection”

Source IDs: EU-GDPR-28, EU-EDPB-ROLES, EU-SCC-2021-915.

Security, breach and DPIA assistance - Found

Article 28(3)(f); Articles 32 to 36. The processor assists with security, breach notifications, impact assessments and prior consultation, taking account of the processing and information available.

All 3 configured phrase groups were found together in the quoted passage.

Matched evidence tests: assistance, Articles 32 to 36 or duties, context.

Missing evidence tests: none.

Evidence 1. Paragraphs 9-10. coverage.

Exact extracted excerpt: “shall assist the controller, insofar as possible, with data subject requests and the exercise of rights under Chapter III. Taking into account the nature of the processing and information available to the processor, the processor shall assist the controller with personal data breach obligations, data protection”

Source IDs: EU-GDPR-28, EU-EDPB-ROLES, EU-SCC-2021-915.

Return or deletion at end of services - Found

Article 28(3)(g). At the controller's choice, the processor deletes or returns all personal data and deletes copies unless retention is required by law.

All 4 configured phrase groups were found together in the quoted passage.

Matched evidence tests: controller choice, delete or return, all data and copies, law exception.

Missing evidence tests: none.

Evidence 1. Paragraphs 11-12. coverage.

Exact extracted excerpt: "END OF SERVICES

At the controller's choice, the processor shall delete or return all personal data and delete existing copies, unless applicable law requires storage."

Source IDs: EU-GDPR-28, EU-EDPB-ROLES, EU-SCC-2021-915.

Compliance information, audits and inspections - Found

Article 28(3)(h). The processor makes compliance information available and allows and contributes to controller or mandated-auditor audits and inspections.

All 3 configured phrase groups were found together in the quoted passage.

Matched evidence tests: compliance information, audits and inspections, controller or auditor.

Missing evidence tests: none.

Evidence 1. Paragraphs 13-14. coverage.

Exact extracted excerpt: "AUDIT AND INSTRUCTIONS

The processor shall make available all information necessary to demonstrate compliance with Article 28 and allow for and contribute to audits and inspections by the controller or an auditor appointed by the controller. The processor shall immediately inform the controller if an instruction infringes applicable data protection law."

Source IDs: EU-GDPR-28, EU-EDPB-ROLES, EU-SCC-2021-915.

Notice of unlawful instruction - Found

Article 28(3), final sentence. The processor immediately tells the controller if an instruction appears to infringe applicable data-protection law.

All 3 configured phrase groups were found together in the quoted passage.

Matched evidence tests: immediate notice, instruction, infringement.

Missing evidence tests: none.

Evidence 1. Paragraphs 13-14. coverage.

Exact extracted excerpt: "AUDIT AND INSTRUCTIONS

The processor shall make available all information necessary to demonstrate compliance with Article 28 and allow for and contribute to audits and inspections by the controller or an auditor appointed by the controller. The processor shall immediately inform the controller if an instruction infringes applicable data protection law."

Source IDs: EU-GDPR-28, EU-EDPB-ROLES, EU-SCC-2021-915.

Human review boundary

- A Found result means the configured phrase groups appeared together. It is not a conclusion that the wording is adequate or enforceable.
- A Not found result means this deterministic check did not locate the configured wording.
- Quotations reproduce extracted text. PDF extraction may not preserve the source file's visual line breaks.
- The tool does not interpret definitions, cross-references, negotiated context or governing-law effects.
- Image-only pages are not processed with optical character recognition. A file with too little extractable text is reported as not assessable.

Official sources

Source	Provision	Date	Link
European Union: Regulation (EU) 2016/679, Article 28	Processor contracts	31 July 2026	https://eur-lex.europa.eu/eli/reg/2016/679/2016-05-04/eng
European Data Protection Board: Guidelines 07/2020 on controller and processor concepts		31 July 2026	https://www.edpb.europa.eu/documents/guideline/guidelines-072020-on-the-concepts-of-controller-and-processor-in-the-gdpr_en
European Commission: Commission Implementing Decision (EU) 2021/915	Article 28 standard contractual clauses	31 July 2026	https://eur-lex.europa.eu/eli/dec_impl/2021/915/oj