

PepperSprint GDPR Commitment

Last Updated: 1 July 2026

Table of Content

TABLE OF CONTENT	0
1 OUR COMMITMENT	1
2 OUR PRINCIPLES.....	1
3 HOW WE PROCESS PERSONAL DATA.....	1
4 OUR ROLE	2
5 INTERNATIONAL DATA TRANSFERS	2
6 SECURITY MEASURES.....	2
7 DATA SUBJECT RIGHTS	3
8 DATA PROCESSING AGREEMENTS	3
9 THIRD-PARTY SERVICES	3
10 PRIVACY BY DESIGN	3
11 EMPLOYEE AWARENESS	4
12 CONTINUOUS IMPROVEMENT	4
13 CONTACT	4

1 Our Commitment

PepperSprint is committed to protecting the privacy and personal data of our clients, partners, website visitors, and employees. As a Dutch-managed technology company serving clients across Europe and internationally, we strive to process personal data responsibly, transparently, and in accordance with applicable data protection laws, including the European Union General Data Protection Regulation (GDPR).

Data protection is an integral part of our business operations, software development practices, and client engagements.

2 Our Principles

When processing personal data, PepperSprint is guided by the following principles:

- **Lawfulness, Fairness and Transparency** – We process personal data only where there is a lawful basis and communicate clearly about how data is used.
- **Purpose Limitation** – Personal data is collected only for specified, legitimate business purposes.
- **Data Minimisation** – We collect only the personal data necessary to provide our services.
- **Accuracy** – We take reasonable steps to keep personal data accurate and up to date.
- **Storage Limitation** – Personal data is retained only for as long as necessary or as required by law.
- **Integrity and Confidentiality** – Appropriate technical and organisational measures are implemented to protect personal data from unauthorised access, loss, alteration, or disclosure.
- **Accountability** – We maintain internal processes to support compliance with applicable privacy obligations.

3 How We Process Personal Data

Depending on the nature of our relationship, PepperSprint may process personal data for purposes including:

- Responding to enquiries and contact requests.
- Delivering software development and consulting services.
- Managing client relationships.
- Recruiting and onboarding employees or contractors.
- Managing contracts and invoices.
- Improving our website and services.
- Maintaining information security.
- Complying with legal and regulatory obligations.

We do not sell personal data to third parties.

4 Our Role

Depending on the engagement, PepperSprint may act as:

- **Data Controller**, where we determine the purposes and means of processing personal data (for example, when managing our website or recruitment process); or
- **Data Processor**, where we process personal data solely on behalf of our clients under their documented instructions.

Where PepperSprint acts as a Data Processor, we process personal data only in accordance with the applicable agreement and our clients' instructions.

5 International Data Transfers

As an international technology company, PepperSprint may collaborate with development teams located outside the European Economic Area (EEA).

Where personal data is transferred internationally, we implement appropriate safeguards consistent with applicable data protection laws. These may include contractual safeguards, technical controls, organisational measures, and other lawful transfer mechanisms where required.

6 Security Measures

Protecting client information is fundamental to our business.

PepperSprint maintains appropriate technical and organisational security measures designed to protect personal data, including, where appropriate:

- Secure authentication and access controls.
- Role-based access management.
- Encryption during transmission using industry-standard protocols.
- Secure development practices.
- Regular software updates and patch management.
- Confidentiality obligations for personnel.
- Controlled access to development environments.
- Monitoring and logging of critical systems where appropriate.

Security measures are reviewed periodically as part of our continuous improvement process.

7 Data Subject Rights

Where applicable under GDPR, individuals may have the right to:

- access their personal data;
- request correction of inaccurate data;
- request deletion of personal data;
- request restriction of processing;
- object to certain processing activities;
- request data portability;
- withdraw consent where processing is based on consent; and
- lodge a complaint with the relevant supervisory authority.

Requests will be handled in accordance with applicable legal requirements.

8 Data Processing Agreements

For client engagements involving the processing of personal data on behalf of our clients, PepperSprint can enter into a Data Processing Agreement (DPA) where required.

Our DPA outlines the responsibilities of both parties regarding data protection, confidentiality, security, and regulatory compliance.

9 Third-Party Services

PepperSprint may use trusted third-party service providers to support our operations, including cloud hosting, communication platforms, development tools, and collaboration services.

Where such providers process personal data, we seek to engage reputable providers that maintain appropriate security and privacy standards.

10 Privacy by Design

PepperSprint encourages the application of Privacy by Design and Privacy by Default principles throughout the software development lifecycle.

Where appropriate, projects are designed to minimise the collection, processing, and storage of personal data while supporting our clients' functional requirements.

11 Employee Awareness

Our personnel are expected to understand their responsibilities regarding confidentiality, information security, and the appropriate handling of personal data.

Access to client information is granted only where required for legitimate business purposes.

12 Continuous Improvement

Data protection and cybersecurity continue to evolve. PepperSprint regularly reviews its internal policies, operational practices, and technical safeguards to support ongoing compliance and the protection of personal information.

13 Contact

Questions regarding this GDPR Commitment or our privacy practices may be directed to:

PepperSprint

Email: privacy@peppersprint.com

For more information about how we collect and process personal data, please refer to our **Privacy Policy**, **Cookie Policy**, and, where applicable, our **Data Processing Agreement (DPA)**.