Data Processing Addendum

Last updated: 10 March 2026

This Data Processing Addendum ("DPA") forms part of the agreement between AI Whisper LLC, a company inco

1. Subject matter and duration

Whisper will process personal data on behalf of Customer for the sole purpose of providing the Service as descri

2. Nature and purpose of processing

The processing includes receiving session-related data and identifiers from Customer, generating engagement m

3. Categories of data subjects and data

Data subjects may include learners/students, tutors and teaching staff, and Customer’s administrative and suppo

4. Roles and responsibilities

Customer acts as data controller and determines the purposes and means of processing. Whisper acts as data p

5. Subprocessors

Customer authorises Whisper to engage subprocessors to support delivery of the Service. Whisper will ensure s

6. Security

Whisper will implement appropriate technical and organisational measures to protect personal data, taking into a

7. Data subject rights and requests

Taking into account the nature of the processing, Whisper will assist Customer, as reasonably possible and whe

8. International transfers

If personal data is transferred outside the jurisdiction where it originated, the parties will ensure that appropriate t

9. Personal data breaches

Whisper will notify Customer without undue delay after becoming aware of a personal data breach affecting Cust

10. Return and deletion of data

Upon termination or expiry of the agreement, at Customer’s choice and subject to applicable law, Whisper will re

11. Audits

On reasonable notice and at reasonable intervals, Customer may request information necessary to demonstrate

12. Precedence

If there is a conflict between this DPA and other terms of the agreement regarding data protection, this DPA will p