replenit

Replenit ROPA Template

Last Updated: 28.11.2025

Record of Processing Activities (ROPA) - Extract

Entity: Replenit sp. z o.o. (acting as Data Processor)
Date of Extract: November 28, 2025
Scope: Provision of Data Analytics and Infrastructure Services

1. Controller & Processor Details

- **Processor:** Replenit sp. z o.o., Warsaw, Poland.
- **Data Protection Officer (DPO) / Privacy Contact:** [Omer Ozden, omer@replen.it]
- **Controller:** Customer (as defined in the MSA/Service Order).

2. Register of Processing Activities (Art. 30(2) GDPR)

ID	Processing Activity Name	Purpose of Processing (on behalf of Controller)	Categories of Processing	Categories of Personal Data	Sub-processors (Recipients)	International Transfers (Country & Legal Basis)	Retention Period
P-01	**Cloud Infrastructure & Hosting**	Hosting the production environment, database management, and compute resources required to run the Service.	Storage, Retrieval, Erasure	User IDs, IP Addresses, Tech Metadata, Client Content.	**Google LLC** (GCP), **Microsoft Corp** (Azure)	**USA** (Transfer Basis: **EU-US DPF Adequacy**)	Duration of Agreement + 60 Days (Grace Period).
P-02	**Big Data Analytics & Processing**	Processing large datasets to generate insights, dashboards, and reports as requested by the Client.	Organization, Structuring, Adaptation, Analysis	Customer Data (as defined in DPA), Query Logs, Usage Metrics.	**Databricks Inc.**	**USA** (Transfer Basis: **EU-US DPF Adequacy** + SCCs Module 3 as backup)	Duration of Agreement + 60 Days.
P-03	**Data Quality & Observability**	Monitoring data pipelines for quality, consistency, and errors.	Monitoring, Validation, Alerting	Metadata, Schema Info, User Identifiers (in logs).	**Soda Software** (Soda Data)	**EU** (Transfer Basis: Intra-EEA)	Rolling 12-month retention for quality logs.

P-04	**Service Performance Monitoring (APM)**	Monitoring system health, uptime, and performance issues to ensure Service Level Agreements (SLAs).	Monitoring, Logging, Diagnostics	IP Addresses, Device Info, Error Logs, User Action Timestamps.	**New Relic Inc.**	**USA** (Transfer Basis: **EU-US DPF Adequacy**).	System Logs: 1 Year (Security/Performance).
P-05	**Business Intelligence & Visualization**	Displaying processed data in visual dashboards for Client end-users.	Display, Consultation, Use	Aggregated Business Data, User Account Info (for login).	**Metabase**	EEA	Duration of Agreement + 60 Days.
-06	**Software Development Collaboration & Code Hosting**	Hosting source code, facilitating version control, and managing development workflows for the Service.	Storage, Versioning, Access Control	Developer User Accounts (names, emails), Git Metadata (commit authors/timestamps), Project/Code Data.	**GitHub, Inc.**	**USA (Transfer Basis: EU-US DPF Adequacy)**	Duration of Agreement + 60 Days.

3. General Description of Security Measures (Art. 32(1) GDPR)

Replenit implements technical and organizational measures to ensure a level of security appropriate to the risk, including:

1. **Encryption:** All data is encrypted in transit (TLS 1.2+) and at rest (AES-256) across all sub-processors.
2. **Access Control:** Strict Role-Based Access Control (RBAC) enforced via Single Sign-On (SSO) and Multi-Factor Authentication (MFA) for all engineering staff.
3. **Pseudonymization:** Direct identifiers are separated from processing data where technically feasible.
4. **Resilience:** Automated backups and disaster recovery protocols hosted in redundant availability zones.
5. **Audit:** Regular vulnerability scanning and code reviews.