Data processing agreement

For customers who store worker records in BeComply. Last updated 17 November 2026.

This agreement forms part of the terms of service between the customer (the "Controller") and [Company name] ("BeComply", the "Processor"). It applies when BeComply processes personal data on the Controller's behalf, and is intended to meet Article 28 of the UK GDPR.

1. Subject matter and duration

BeComply processes personal data to provide a right to work record-keeping and reminder service. Processing lasts for as long as the Controller has an account, plus the period needed to delete data afterwards.

2. Nature and purpose

Storing, organising, displaying and flagging right to work check records and follow-up dates, and recording an audit log of changes. No other purpose.

3. Types of data and data subjects

- **Data subjects:** the Controller's workers and prospective workers, and the Controller's own users.
- **Data:** name, date of birth, role, check type, date of check, share code or document reference, right to work end date, and the Controller's users' email addresses.

- **Special categories:** not intentionally processed. Information about immigration status may be sensitive, so it is handled with extra care.

4. Processor's obligations

BeComply will:

a. process personal data only on the Controller's documented instructions, including these terms, unless the law requires otherwise, in which case it will tell the Controller first where permitted;

b. make sure everyone authorised to process the data is bound by confidentiality;

c. take appropriate security measures as set out in section 8;

d. only engage sub-processors as set out in section 5;

e. help the Controller respond to requests from individuals exercising their rights, taking account of the nature of the processing;

f. help the Controller meet its security, breach notification, impact assessment and consultation obligations under Articles 32 to 36 UK GDPR;

g. at the Controller's choice, delete or return all personal data at the end of the service, and delete existing copies unless the law requires storage;

h. make available the information needed to show compliance, and allow and contribute to audits, including inspections, by the Controller or its auditor on reasonable notice; and

i. tell the Controller if it believes an instruction breaches data protection law.

5. Sub-processors

The Controller gives general authorisation for BeComply to use the sub-processors below. BeComply will give notice of changes so the Controller can object, and will bind sub-processors to equivalent obligations.

Sub-processor	Purpose	Location
Supabase	Database, authentication and file storage	[Data region]

Sub-processor	Purpose	Location
[Website hosting provider]	Hosting the website	[Location]
[Email provider]	Account and support emails	[Location]

6. International transfers

If personal data is transferred outside the UK, BeComply will ensure an appropriate safeguard applies, such as the UK International Data Transfer Agreement, the UK Addendum to the EU standard contractual clauses, or an adequacy regulation.

7. Personal data breaches

BeComply will tell the Controller without undue delay after becoming aware of a personal data breach affecting the Controller's data, and give the information the Controller reasonably needs to meet its own duties.

8. Security measures

- Encryption in transit (TLS) and at rest.
- Row-level access controls so each customer can only access its own records.
- Authenticated access. Service-level keys are never exposed in the web application.
- An audit log of changes to records. The log does not store dates of birth.
- Reliance on infrastructure providers that hold recognised security certifications.

9. Controller's responsibilities

The Controller is responsible for having a lawful basis to process workers' data, for giving workers the required privacy information, and for the accuracy of the data it enters.

10. Contact

Data protection contact: hello@becomply.co.uk.

This agreement applies automatically on acceptance of the terms of service. A signed copy can be requested using the contact page.