LEGAL

Data Processing Agreement

LAST UPDATED	19 November 2026
ISSUED BY	SkyLink API, sole trader (ditta individuale) established in Italy. P.IVA IT04163490123.

> **STATUS**
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> This document is a template pending legal review. It becomes binding only when it is signed, or incorporated by an order form or Master Services Agreement that references it.

1. Clauses adopted

The parties adopt, without modification, the standard contractual clauses between controllers and processors under Article 28(7) of Regulation (EU) 2016/679, set out in Commission Implementing Decision (EU) 2021/915 of 4 June 2021. The official text is at https://eur-lex.europa.eu/eli/dec_impl/2021/915/oj (https://eur-lex.europa.eu/eli/dec_impl/2021/915/oj). The clauses and the annexes below form this agreement. Where the clauses refer to the controller and the processor, the Customer is the controller and SkyLink is the processor.

Options selected

CLAUSE	OPTION
Clause 7.7(a), sub-processors	Option 2, general written authorisation. The processor will inform the controller of any intended addition or replacement of sub-processors at least 30 days in advance, giving the controller the opportunity to object. The current list is in Annex IV.

CLAUSE	OPTION
Clause 5, docking clause	Applies. Any entity that is not a party may accede to these clauses with the agreement of the parties.

Scope

This agreement applies where the Customer's use of the SkyLink API involves personal data processed on the Customer's behalf. The aviation data the API serves is not personal data processed on the Customer's behalf; see Annex II. Questions about this agreement: hello@skylinkapi.com. See also the Privacy Policy.

I. Annex I: List of parties

Controller

Name	_____
Address	_____
Contact person, position, contact details	_____
Signature and accession date	_____

Processor

Name	SkyLink API, sole trader (ditta individuale) established in Italy (P.IVA IT04163490123)
Address	As stated in the order form
Contact	SkyLink API support, hello@skylinkapi.com
Signature and accession date	_____

II. Annex II: Description of the processing

Purpose	Providing the SkyLink API to the controller, and providing support for it.
Categories of data subjects	The controller's staff who hold the account or contact support. Individuals whose IP address the controller submits to the IP-geolocation airport search endpoint, if the controller uses it.
Categories of personal data	Name, work email address and billing contact; the API key identifier; webhook destination URLs; IP addresses submitted to the geolocation endpoint, which are processed transiently and not stored.
Special categories of data	None.
Nature of processing	Receiving, storing, transmitting and deleting the data above to authenticate requests, meter use, deliver webhooks and respond to support requests.
Duration	The term of the agreement, plus the retention periods in section 6 of the Privacy Policy.

> NOTE
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> The aviation data served by the API (positions, schedules, weather, airports and similar) is not personal data processed on the controller's behalf. SkyLink determines its content and sources, and the Terms of Use treat the Customer as an independent controller of any such data it retains.

III. Annex III: Technical and organisational measures

- The API is served over HTTPS only.
- Requests are authenticated by API key.

- Storage is minimal: SkyLink keeps only the data needed to run, meter and bill the service, for the periods in the Privacy Policy.
- Where webhook subscriptions are associated with a customer, they are stored against a hash of the API key, not the key itself.
- Access to production systems is limited to the two people who operate the service.
- Errors are tracked so that faults and abnormal behaviour are detected and investigated.
- Personal data breaches are notified to the controller without undue delay after SkyLink becomes aware of them.

Further security information is at skylinkapi.com/security/.

IV. Annex IV: List of sub-processors

The controller authorises the following sub-processors. The list, purposes and locations are those in section 5.1 of the Privacy Policy. Netlify, Umami and Tally relate to the website and its forms, not to the API. Anthropic, Lark, Brevo and Notion support engineering, email and customer relationships.

SUB-PROCESSOR	PURPOSE	LOCATION
Polar Software Inc.	Billing, subscriptions, licence keys	United States
Cloudflare, Inc.	Website CDN, TLS termination, WAF and DDoS protection; Workers AI	Global edge
Infomaniak Network SA	Server hosting; newsletter mailing list	Switzerland
Netlify	Website hosting and form bot protection	Global edge
Umami Cloud (cloud.umami.is)	Cookieless traffic analytics	United States
Tally (tally.so)	Website forms and surveys	European Union

SUB-PROCESSOR	PURPOSE	LOCATION
Anthropic, PBC (Claude)	AI assistant used in engineering and customer support	United States
Lark Technologies Pte. Ltd.	Email hosting	Singapore
Brevo (brevo.com)	Automated emails	France (EU)
Notion Labs, Inc.	Customer relationship management (CRM)	United States
Bugsink (bugsink.com)	Application error tracking	Germany (EU)
Better Stack (betterstack.com)	Status page and uptime monitoring	Germany (EU)