

AVG & data-processing layer — advisory engagement (1 page)

Not legal advice. This sheet explains what we agree before work touching personal data begins. Forward to your compliance officer or accountant.

When this applies

Any system that collects, stores or processes **personal data** on behalf of an advisory firm — including a lead-qualifying assistant, enquiry forms or a content engine with author metadata — requires a clear data-processing agreement **before go-live**.

What we agree (verwerkersovereenkomst / AVG)

Topic	Our standard position
Roles	Client = data controller. Norbert / Quietforge = data processor for the systems built.
Purpose	Lead qualification, enquiry routing, content workflow — limited to agreed scope.
Data collected	Enquiry type, contact details, topic summary — not tax records, financial filings or client dossiers.
Retention	Defined per data type; deletion procedure documented in handover.
Sub-processors	Disclosed upfront (hosting, email, AI API if used). EU preference enforced.
Breach notification	Processor notifies controller without undue delay if a breach is detected.
End of engagement	Data export offered; access revoked; deletion per agreed schedule.

Technical controls (mirrors production standards)

Access

- Dedicated **service accounts** with minimum permissions
- **No passwords** shared over WhatsApp, email or chat
- Access **revoked cleanly** after handover — client can remove in their own admin panel

Data location

- Hosting and databases **within the EU**
- Provider settings configured to **prevent training on client data** where technically available

AI assistant — qualification only

- Collects **only what is needed** to route an enquiry
- **Cannot access** client financial records or tax filings
- **Cannot provide** tax, legal or financial advice — hard guardrails in system design
- **Human-in-the-loop** during rollout; production behaviour agreed in UAT

Oversight

- **Logs on request** — who did what, when
 - **Human approval** before any AI-generated content publishes
 - **Audit-friendly** — documentation suitable for internal review, not a substitute for legal counsel
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What this sheet is NOT

- **Not legal advice** — final wording of any verwerkersovereenkomst is agreed between parties; client's own counsel reviews where required.

- **Not a guarantee of regulatory outcome** — compliance is a shared responsibility; we document and implement agreed controls.
 - **Not a promise of launch date** — this engagement is **in delivery**; go-live follows phased sign-off.
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Checklist before processing live data

- Scope document signed — assistant boundaries explicit (qualification only)
 - Verwerkersovereenkomst signed
 - Sub-processors listed and accepted
 - Service accounts created with scoped permissions
 - Test environment validated — no live client data in test
 - UAT sign-off on assistant guardrails and content approval flow
 - Handover README includes retention and deletion procedure
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Next step

Want the same rigour applied to your firm? Book a paid **Automation Map** — we identify what data your first system will touch and what agreements you need before a single line of code hits production.

Book: services.flexgrafik.nl/book-discovery/

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