

Data Processing Agreement Action Checklist

Action Checklist — ClearLegalTips.com (2026)

Work through these steps before you send any personal data to an outside vendor.

Step 1 — Map Your Processors

- ☐ Listed every outside tool that touches personal data (email, hosting, analytics, payments, support)
- ☐ Marked your role with each one: controller, processor, or both
- ☐ Confirmed which laws apply (GDPR, CCPA, Virginia, Colorado, or several)

Step 2 — Pick Your Sub-processor Model

- ☐ Chose specific or general authorization for each processor
- ☐ Requested each processor's current sub-processor list
- ☐ Set how you will get notice of sub-processor changes

Step 3 — Complete the Annex

- ☐ Filled in the subject matter, duration, nature, and purpose of processing
- ☐ Listed the personal data types and the categories of data subjects
- ☐ Named your security measures and breach-notice contact

Step 4 — Sign Before Data Flows

- ☐ Signed the agreement before sharing any personal data
- ☐ Added CCPA service-provider terms if you handle California data
- ☐ Attached the 2021 Standard Contractual Clauses if data leaves the EU or EEA
- ☐ Gave every party a signed copy

Step 5 — Calendar Reviews

- ☐ Set an annual review of every DPA and every sub-processor list
- ☐ Flagged a re-check when a vendor changes sub-processors or a privacy law changes

INSTRUCTIONS FOR USE

If you handle special-category data (such as health data), children's data, or a complex chain of sub-processors, have a privacy attorney review your agreements. This checklist is general information, not legal advice.