

EU Data Act

Document Information

Document ID:	CD-EUDA	Document Owner:	Steve Dodson
Document Version	1.0	Created by:	Steve Dodson
Date:	18 December 2025	Approved by:	Jakob Bjørn Sørensen

Copyright © 2025 Admin By Request

All rights reserved.

Information in this document is subject to change without notice. The software described in this document is furnished under a license agreement or nondisclosure agreement (NDA). The software may be used or copied only in accordance with the terms of those agreements.

No part of this publication may be reproduced, stored in a retrieval system, or transmitted in any form or any means electronic or mechanical, including photocopying and recording for any purpose other than the customer's stated use without the written permission of Admin By Request.

Table of Contents

1	Introduction.....	4
1.1	Purpose	4
1.2	Scope	4
1.3	Limitations	4
1.4	Audience	5
1.5	Related Documents	5
2	Compliance Statement.....	6
2.1	Customer Control of Switching and Export	6
2.2	Data Export Rights.....	6
2.3	Non-Exportable Data	6
2.4	Retrieval Period	7
2.5	Data deletion After Switching	7
2.6	Assistance During Switching.....	7
2.7	Supported Formats, Interfaces and Constraints	7
2.8	Hosting Regions and International Access Transparency	8
2.9	Interoperability and Future Standards.....	8
3	Document History.....	9

1 Introduction

1.1 Purpose

The purpose of this document is to describe how Admin By Request supports customer rights and obligations under the EU Data Act, with particular focus on data access, portability, switching, and deletion. Admin By Request gives customers continuous control over their data through built-in service capabilities that allow data to be accessed, exported, managed, and deleted in a secure and predictable manner.

This document outlines the principles, processes, and technical mechanisms that Admin By Request uses to facilitate compliance with the EU Data Act. It explains how customers can retrieve their data in a usable format, transition away from the service if required, and ensure that data is handled appropriately throughout its lifecycle. The objective is to provide transparency and assurance that Admin By Request enables lawful, secure, and customer-controlled data handling.

1.2 Scope

This document applies to customer data processed within the Admin By Request service and focuses specifically on aspects relevant to the EU Data Act, including:

- Data access and export capabilities available to customers
- Supported data formats and interfaces for portability
- Data categories that are included in, or excluded from, portability
- Processes for data deletion following service switching or termination
- Information relating to data hosting locations and applicable safeguards
- Measures in place to protect against unlawful or unauthorized data access

The scope is limited to data handled by Admin By Request in its role as a service provider and should be read in conjunction with other Admin By Request documentation, including security, privacy, and data processing materials, where applicable.

1.3 Limitations

The document is intended to provide informational and technical guidance on how Admin By Request aligns with the requirements of the EU Data Act. It does not constitute legal advice and should not be interpreted as a substitute for independent legal or regulatory consultation.

Certain data types may be excluded from portability where required by law, contractual obligations, security considerations, or to protect the rights of third parties. Additionally, while Admin By Request provides tools and documentation to support data export, switching, and deletion, customers remain responsible for ensuring that their own downstream systems, processes, and regulatory obligations are met once data is exported or transferred.

The availability of specific features or data may also depend on service configuration, subscription level, or regional deployment.

1.4 Audience

This document is intended for:

- **Customers and administrators** using Admin By Request who are responsible for data governance, compliance, or service transitions
- **Security and IT teams** evaluating data portability, access controls, and regulatory alignment
- **Compliance, legal, and risk professionals** assessing adherence to the EU Data Act
- **Procurement and vendor-risk stakeholders** requiring transparency around data handling and switching capabilities

The document content assumes a working knowledge of enterprise IT environments, cloud services, and data protection principles, and is written to support informed decision-making by organizations operating within the scope of EU digital and data regulations.

1.5 Related Documents

This document may refer to, and should be read in conjunction with, the following:

- Commitments and responsibilities in ABR's Data Processing Agreement
- Support provisions in ABR's Terms and Conditions and Customer Support Services
- Data handling processes in How We Handle Your Data
- Collection, use and disclosure of personal data in ABR's Privacy Policy and Data Privacy Settings

Refer also to ABR's Trust Center documents.

2 Compliance Statement

2.1 Customer Control of Switching and Export

Customers may initiate switching at any time by exporting their data using the built-in features of the service. Admin By Request does not impose contractual, technical or organizational barriers that interfere with switching.

Customers may export their data during the subscription term and throughout the retrieval period defined in this document. Export is enabled through the standard export tools included in the service.

Switching timelines may vary depending on customer configuration, data volume, target systems and other factors outside Admin By Request's control.

2.2 Data Export Rights

Customers may export all Customer Data held within their tenant. Customer Data consists of the information the customer enters or generates during use of the service, including:

- Inventory data
- Audit logs

Customer Data is made available in structured, commonly used, machine-readable formats, including:

- XLSX
- CSV
- PDF (supplementary)

Customers perform exports directly through the product interface by selecting the export options provided for each dataset. Multiple exports may be performed at any time.

The datasets listed in this section constitute the exhaustive list of exportable data for the purposes of the EU Data Act.

2.3 Non-Exportable Data

Certain data generated solely for the operation and security of the service is not Customer Data and is not included in exports. This includes internal service logs, telemetry, system metadata, security monitoring information and other internal technical data used only to operate or protect the service.

These exclusions protect service stability, confidentiality and security for all customers.

2.4 Retrieval Period

If a customer terminates the service without deleting their tenant, Customer Data remains accessible for export for at least **30 days** (the retrieval period). During this period:

- Export tools remain accessible
- The customer may perform multiple exports
- Admin By Request maintains continuity and access to export functionality

IMPORTANT

If the customer deletes their tenant earlier, deletion is immediate, and the retrieval period does not apply.

After the retrieval period expires, Admin By Request may remove any remaining Customer Data in accordance with "Data Deletion After Switching" below

2.5 Data deletion After Switching

Customers may delete their tenant at any time using the built-in deletion features of the service. When a customer deletes their tenant, the deletion is permanent and removes the entire tenant and all Customer Data from active systems. This includes:

- All inventory data belonging to the tenant
- All audit log entries associated with the tenant
- All user accounts and settings created within the tenant

Identifiable Customer Data that appears in system logs is removed or anonymized in line with Admin By Request's log retention practices based on the customer's chosen data retention settings in the portal.

Backups follow Admin By Request's standard backup schedule and are not used to restore deleted tenants.

2.6 Assistance During Switching

Admin By Request provides reasonable assistance during switching, including:

- Access to documentation describing export methods
- References to available export features
- General guidance on performing exports and managing data retrieval
- Helpdesk support where needed to enable use of export features

The customer retains full control over initiating and managing exports and over the timing of switching.

2.7 Supported Formats, Interfaces and Constraints

Formats

- XLSX
- CSV
- PDF (supplementary)

Interfaces

- Built-in export features
- Documented APIs where applicable

Constraints

- Customer data retention configurations may limit historical data availability
- Internal-only datasets are excluded from export
- Large data volumes may require additional extraction time
- Certain export features may have file-size or batching limits, documented where applicable

All export interfaces required for switching are provided without additional charge.

2.8 Hosting Regions and International Access Transparency

Admin By Request publishes the regions or countries where Customer Data is stored and processed (please refer to Annex IV of our Data Processing Agreement). Admin By Request implements appropriate technical and organizational measures to protect Customer Data and non-personal data from unlawful access by non-EU authorities.

Any request from non-EU authorities for access to Customer Data or non-personal data is reviewed by legal specialists, logged and handled in accordance with applicable law and Admin By Request's information security and privacy procedures.

2.9 Interoperability and Future Standards

Admin By Request uses open, machine-readable formats and documented interfaces to support portability and switching. When the European Commission adopts interoperability standards under Article 35 of the EU Data Act, Admin By Request will implement them within the required **12-month** timeframe.

Documentation will be updated accordingly.

This document is reviewed annually

3 Document History

Version	Author	Changes
18 December 2025 1.0	Steve Dodson	Initial document release.