

Restricted collections: how to instruct Ansvar

Cover note to Annex R. Form version R-2026-09-23.2.

Some court-decision collections name the people involved, sometimes with health or criminal-law details. Ansvar has no legal basis of its own to serve them, so we serve them only to an organisation that instructs us in writing and has its own legal basis. For those collections your organisation is the controller and Ansvar is your processor.

Annex R is that instruction: a short annex to our Data Processing Addendum (ansvar.eu/dpa), only for the collections you list. The Data Processing Addendum itself does not change. The annex names the collections, the purpose, the retention period and the end date.

What to send

Send the following to claims@ansvar.eu with "Restricted source" in the subject:

1. Annex R, completed and signed.
2. Your assessment of this processing (a DPIA or equivalent), or a summary of it.
3. A separate legal-basis statement, only if section 5 of the form does not state your basis in full.
4. Optional: your DPO's view on the instruction. It goes on file next to our own reading.

What happens next

1. Review. We check that the form is complete and signed, that your assessment covers each collection, use and scope you ask for, and that section 5 names your Article 6 basis and any Article 9 condition or Article 10 authorisation. We record each check in our due-diligence register. We do not judge your commercial need. If we consider an instruction to infringe data-protection law, we tell you and may decline it.
2. Decision per collection. For each collection we grant it as requested, grant it narrower (for example lookup only, or an earlier end date), or refuse it. We tell you the outcome, and the reason for any narrowing or refusal.
3. Grant. We add the grant to the accounts of your organisation. Only accounts in your organisation can use it. Ansvar staff and test accounts cannot, whatever their settings. Every served record and every refused request is logged with your organisation and the grant identifier, never with the content.
4. Expiry. Access ends on the end date in section 7. A review date is only a reminder. To continue after the end date, send a new form.
5. Revocation. You can revoke the instruction at any time by writing to us from the contact in section 8 or by the signatory. It takes effect at the next request.
6. Deletion receipt. Within ten business days after access ends we remove the grant from your accounts and, for search, delete your copy. You receive a deletion receipt that lists each store as deleted, pending backup expiry (with the date), or retained under a legal obligation we name.

Questions: claims@ansvar.eu. Ansvar Systems AB, 559547-2225, Ingemarsboda 565, 841 74 Fränsta, Sweden.

Annex R: Instruction for restricted collections

Annex to the Data Processing Addendum between the Customer and Ansvar Systems AB. Form version R-2026-09-23.2.

This Annex is the Customer's written instruction under the Data Processing Addendum published at ansvar.eu/dpa (the "DPA"), in the version the Customer has accepted. The DPA is not changed. For the collections in section 3 the Customer is the controller and Ansvar is the processor, and Ansvar processes them only as this Annex instructs. The DPA's terms on sub-processors, personal-data breaches, assistance with data-subject requests, audits, return or deletion, and liability apply to this processing. Where this Annex sets a shorter deletion period than the DPA, the shorter period applies. The clause mapping named in the box at the end of this form lists the DPA clause each term of this Annex relies on and which one applies where they differ.

1. Parties

Customer (controller): legal entity name	
Registration number	
Registered address	
Signatory's function	
Ansvar (processor)	Ansvar Systems AB, 559547-2225, Ingemarsboda 565, 841 74 Fränsta, Sweden

2. Data Processing Addendum

DPA version the Customer accepted (as shown on ansvar.eu/dpa)	
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3. Collections and use

Collection ID (as Ansvar lists it)	Collection name	Use (tick one or both)	Scope
		☐ Lookup by decision identifier ☐ Search	☐ Whole collection ☐ Subset: _____
		☐ Lookup by decision identifier ☐ Search	☐ Whole collection ☐ Subset: _____
		☐ Lookup by decision identifier ☐ Search	☐ Whole collection ☐ Subset: _____
		☐ Lookup by decision identifier ☐ Search	☐ Whole collection ☐ Subset: _____

Lookup: when your agent asks for one decision by its identifier (for example an ECLI or case number), we fetch it from the official publisher at that moment and keep no copy. Search: we hold a searchable copy of the collection for your organisation alone. One use does not include the other.

4. Purpose

What the Customer uses these collections for	
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5. Legal basis for the collections, uses and scope in section 3

Article 6(1) GDPR (tick one or more):

- ☐ (b) performance of a contract to which the data subject is party
- ☐ (c) a legal obligation of the Customer: _____
- ☐ (e) a task in the public interest or in the exercise of official authority: _____
- ☐ (f) legitimate interests; the balancing test is part of the assessment in section 6
- ☐ Other: _____

Article 9 GDPR (special categories, such as health data):

- ☐ Not applicable: the scope in section 3 involves no special-category data
- ☐ 9(2)(f) establishment, exercise or defence of legal claims
- ☐ 9(2)(g) substantial public interest, on the basis of: _____
- ☐ Other: _____

Article 10 GDPR (criminal convictions and offences):

- ☐ Not applicable: the scope in section 3 involves no criminal-offence data
- ☐ Authorised by Union or Member State law (name the provision): _____

6. Assessment

- ☐ The Customer has assessed this processing (a DPIA or equivalent) for the collections, uses and scope in section 3.
- ☐ The assessment, or a summary of it, is attached. The Customer gives Ansvar the full assessment on request.

Assessment reference and date	
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7. Retention and period

How long the Customer keeps content it receives from these collections	
Start date	
End date (access ends)	
Review date (optional; a reminder, not an end date)	

Ansvar's side is fixed. Lookup: no copy, no cache and no content in logs; request logs hold identifiers and timing only. Search: one copy for the Customer alone, with the publisher's raw responses kept as its provenance record, all deleted with versions and replicas within ten business days after access ends; backups expire after the period Ansvar enters in the box at the end of this form.

8. Contact for revocation and deletion

Function or team	
Email (a shared mailbox is preferred)	
Phone (optional)	

Ansvar accepts a revocation from this contact or from the signatory, and sends the deletion receipt to this contact.

9. What Ansvar does for these collections

- Acquires them only from the official publisher, never from a mirror or aggregator.
- Serves them only to accounts of the Customer's organisation that carry the grant, and checks the grant on every request. Ansvar's own staff, service accounts and test probes are refused.
- Applies the data-minimisation rules recorded for each collection and adds no editorial content.
- Logs each grant, revocation, served record and refused request with the Customer's organisation and the grant identifier, never the content.
- Does not use the collections to train models, to build other products, or to serve anyone else under this instruction.
- Processes them in the EEA only.
- Tells the Customer without delay if it considers an instruction to infringe data-protection law (Article 28(3) GDPR), and may decline that instruction.

The Customer remains responsible for its own use of the content, for informing data subjects where required, and for data-subject requests it receives. Ansvar forwards any such request it receives to the contact in section 8 and assists as the DPA sets out.

10. Signatures

	For the Customer	For Ansvar Systems AB
Name		Jeffrey von Rotz
Function		Founder
Date		
Signature		

Filled in by Ansvar

Ansvar organisation ID	
Data and data-subject categories per collection (Annex R §R.4)	
Backup expiry period per search copy	
Retention of request logs and access records	
Grant IDs	
Decision record	
Clause mapping version	CM-2026-09-23, DPA version 2026-07-27 (Annex R terms §R.7, docs/contracts/restricted-source-instruction-annex.md)
Received on	