

ATTORNEY-APPROVED OPERATING STANDARD

Lakefront DPA Review Playbook

Version 3.2 · Privacy & Cybersecurity Practice

Owner	Privacy Practice Leader
Approved	18 August 2026
Review cycle	Annual or upon material legal change
Applies to	Vendor DPAs where the firm's client is Controller
Supersedes	Version 3.1
Status	Approved for pilot use

Training notice. All parties, facts, clauses, dates, and outcomes in this document are fictional. Use only for demonstration and evaluation.

1. Review method and authority

Purpose

This playbook converts recurring attorney judgment into review instructions. It does not replace matter-specific legal analysis. Every released finding must cite the contract and the controlling playbook rule.

Required workflow

- Classify the document and client role.
- Extract exact clause text with page evidence.
- Compare only to approved rules.
- Have an independent evidence reviewer challenge each conclusion.
- Route proposed language to an attorney; never send it externally without approval.

Severity definitions

Critical Immediate escalation

A deviation creates substantial regulatory, security, or business-continuity exposure and should block approval until counsel decides.

High Negotiation required

A material deviation from the standard position that normally requires remediation or express risk acceptance.

Medium Commercial judgment

A meaningful but context-dependent variance routed to the designated partner.

2. Security, subprocessors, and deletion

PB-014 Security incident notice

Require notice without undue delay and no later than 72 hours after discovery of an actual or reasonably suspected incident affecting client data. A longer fixed period is Critical. A trigger based only on confirmation is also a deviation.

PB-021 Subprocessor change control

Require at least 30 days' prior written notice and a right to object on reasonable data-protection grounds. Website-only notice without an objection mechanism is High.

PB-033 Backup deletion

Allow inaccessible disaster-recovery copies for no more than 90 days after active deletion. Copies must remain protected and unused except for recovery. A 91–120 day period is Medium; an open-ended ordinary-course exception is High.

3. Liability, audit, and transfers

PB-041 Enhanced liability protection

Require a separate cap of at least two times fees paid or payable in the preceding 12 months for confidentiality, security, and data-protection obligations. A lower cap is Medium unless matter facts justify escalation.

PB-052 Audit evidence

Require current independent assurance evidence and a right to receive remediation status. Onsite audit rights may be reserved for material incidents or unresolved findings.

PB-061 Restricted transfers

Transfers must use an approved legal mechanism and supplementary measures where required. Do not infer adequacy or governing law from a party's address.

Attorney gate

Only an attorney may accept a deviation, approve final redlines, characterize legal compliance, or authorize communication to a client, counterparty, regulator, or court.