

## GDPR B2B Integration Service Product Statement

### *Understanding GDPR for the OpusCapita B2Bi offering*

By using OpusCapita B2B Integration Service Customer can outsource B2B message delivery including data conversions with its trading partners like Suppliers, Customers and Logistic partners. OpusCapita manages our customer business critical B2B supply chain needs with a single ERP connection. Implementation, onboarding, mapping, translation, routing, 24/7 monitoring and trading partner enablement are part of the service.

Service supports different kind of technical formats used by the trading partners, such as Ansi X.12, Odette, UN/Edifact, Eancom, RosettaNet, Tradacoms, VDA, XML, UBL. The B2B messages (business documents) will be sent from Customer IT- systems using ERP- integration connection, translated and routed to designated recipient automatically by B2B Integration service.

OpusCapita as a business to business integrator takes care of two main areas:

- Integrates data between Customer's internal format and the standard or proprietary formats used by Customer trading partners
- Manages reliable electronic business document data conversions and routings between Customer IT systems including other integration service providers and VAN providers within Customer's business network.

The message delivery is handled by using B2B-connections. These connections enable the electronic processing of e.g. orders, order confirmations, delivery responses, invoices, customs formalities and transport information in B2B commerce. OpusCapita's B2B Integration service includes interconnections (gateways) to other Business partner's integration service providers, which extends Business partner connectivity globally.

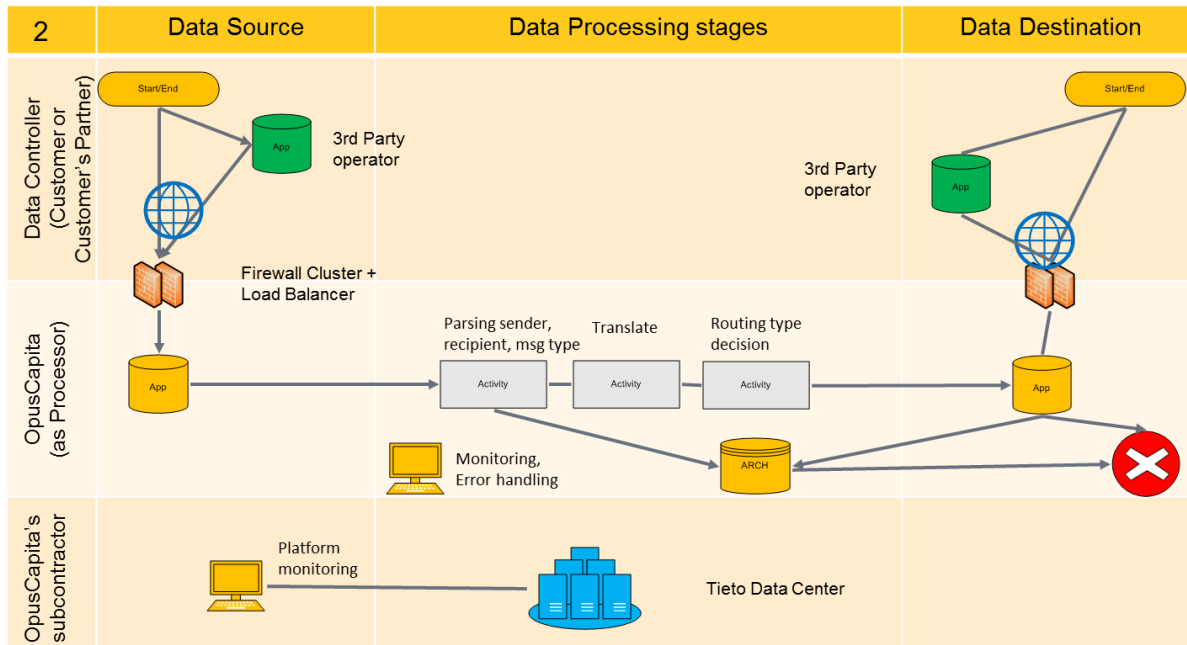
OpusCapita's B2B Integration Service is offered as Cloud based multitenant Service to our customers. The Service Platforms are including all licenses, hardware and software. OpusCapita is responsible of setting-up the service, monitoring connections and maintaining it. OpusCapita has different multitenant Platforms for managing mapping, translation, routing, monitoring and connectivity of the continuous Service.

The following aspects are considered out-of-scope for this DPIA record:

- integrated 3<sup>rd</sup> party customer systems such as ERP, EAI or Databases.
- Other connected Gateways or Service Providers which are part of the Supply Chain Process.

**Understanding the data flow and the processing stages**

Illustrative example (actual flow depends on the platform):



**Why does OpusCapita B2Bi process personal data?**

Customer is the CONTROLLER and PROCESSOR of personal data processed on B2B Integration Service.

Customer shall control and process personal data in accordance with the requirements of data protection laws and regulations. For the avoidance of doubt, Customer’s instructions for the Processing of Personal Data shall comply with data protection laws and regulations. Customer shall have sole responsibility for the accuracy, quality, and legality of personal data and the means by which Customer acquired personal data.

OpusCapita shall treat personal data as confidential information and shall only process personal data on behalf of the customer on following occasions:

- Processing in accordance to agreement between OpusCapita and the Customer.
- Processing in accordance to a documented service or support request made by the customer.

OpusCapita Group Oy or it’s employees have otherwise no role as CONTROLLER or PROCESSOR of personal data on B2B Integration Service.

**What are the categories of data subjects and of the personal data we process?**

Description of the categories of data subjects and of the categories of personal data (Art.30.1.c) or the categories of processing carried out on behalf of each controller(Art.30.2.b).

There are three (3) types of personal data handled in B2B Integration service:

- For (A) Business to Business Trade information: company name, username, name, e-mail, phone number, company address – BASIC type.
- For (B) user data in Portal applications part of the service (Supplier Web, Track&Trace Portal, WWD): Login-name, Name, Company, email, phone number – BASIC Type.
- For (C) third party data content: only is specific non-trading related messages, varies depending on the content of the messages provided by specific customers – BASIC or SENSITIVE Type.

Data content (A) is used by OpusCapita customers to handle their Supply Chain, Purchasing, Logistics and Sales processes as required by their business need.

Identification data (B) is needed by B2B Integration Portal solutions to identify, authenticate and authorize a user in the system.

Data content (C) is used by specific OpusCapita customers in cases where the message is not related to trading or invoicing, specific content depends on the purpose of the messaging .

B2B Integration Service saves all messages, including related personal data to databases. OpusCapita is responsible of storage, maintenance and backups of the databases.

Customer is responsible of the deletion of the data. OpusCapita does not delete any personal data from the service automatically.

### ***Who administers data processed and stored in the B2Bi product?***

Depending on Service Platform B2B Integration Service is hosted on European hosting partner and all servers are physically located inside EU area. Web Portal Parts of the Solution (Supplier Web, Track&Trace, WWD) are accessible via secure internet connections (https:) from workstation's browsers.

OpusCapita is responsible of setting-up the service, monitoring connections and maintaining it as managed Service for customers. Customer is responsible for removal of all data stored on B2B Integration Service. Removal of business documents and related data from short term storage can be done by Customer's request to OpusCapita ServiceDesk. Following storage rules will apply

- All Customer business documents are stored before and after transformation
- Data is stored to short term storage for 90 days
- Data is stored to long term storage after 90 days period

### ***Where can the customer get additional information for GDPR safeguards and security for B2Bi?***

The B2Bi product is covered by the company-wide information security practices which define the Technical and Organization Measures to ensure the security of processing, including such elements as Access, General controls, Data Retention and Protective controls. These measures are based on a risk assessment performed for the service offered. Risks identified in the assessment together with the measures implemented to mitigate those risks are recorded. The security measures are implemented appropriately, with due regard to the state of the technology, the costs of implementation and the nature, scope, context and purposes of processing as well as the likelihood and severity of the privacy risks.

Assessments are carried out before new services are taken into use by OpusCapita or offered for use by OpusCapita's customers, and before major changes in the said services takes place.

***What efforts have been made for Privacy compliance training?***

All OpusCapita employees are required to participate in training for personal data awareness and general compliance. Additional in-depth training is provided to target audiences in the specific areas of GDPR and on information security. GDPR education effort has included also evaluation of current and future solution design projects by the relevant personnel. The process for design and development has been updated to include key checkpoints to insure GDPR requirements are taken into account when designing solutions.

***Who are the key partners or vendors who assist OpusCapita to process data in B2Bi?***

OpusCapita provides its customers information about vendors who participate in data processing activities for the B2Bi product (sub-processors). After OpusCapita has completed implementation of the GDPR knowledge center within the customer service portal, the customers will be able to view and approve the sub-processors online.

The sub-processors for B2Bi are the following:

Tieto Group

Helsinki Finland

Data Center Services for Messaging Platform (CWAY), backups, storage

Invoice image, meta data extracted; eInvoice; EDI messages; user identification data

IBM

Helsinki Finland

Data Center Services for Messaging Platform (A2A), backups, storage, Invoice image, meta data extracted; eInvoice; EDI messages; user identification data

Microsoft Azure cloud

Located in EU

Messaging Platform (SIRIUS), backups, storage, Invoice image, meta data extracted; eInvoice; EDI messages; user identification data

Bisnode Data Center Services

Located in Sweden

Messaging Platform (XIB), backups, storage, Invoice image, meta data extracted; eInvoice; EDI messages; user identification data