

GDPR Business Network Portal Product Statement

Understanding GDPR for the OpusCapita Business Portal

OpusCapita's Business Network Portal helps buyers and suppliers engage with their business ecosystem, expand their capabilities for electronic document exchange for trade, invoicing and collaboration. It offers a full visibility and enables search and track all processed in and outbound business documents in OpusCapita network.

It's a single place for viewing, approving and modifying the Purchase orders and creating matching invoices allowing streamlined process for both parties.

Business Network Portal also includes Supplier onboarding tool effortless electronic collaboration with Trading partners which accelerates the e-transition.

Business Network Portal is connected through OpusCapita Messaging platform to growing number of other OpusCapita products like eProcurement and Invoice Processing Automation. It also integral part of OpusCapita Business Network and the products like Invoice Sending, Invoice Receiving and B2B Integration.

The assessment focuses on three feature sets:

- Onboarding campaigns including recipient data of invited suppliers contact persons.
- Registration process including identification data for accessing Business Network Portal (Customers employee, Suppliers employee).
- B2B documents (PO-confirmations and Invoices) created in Business Network Portal including content that is expected to be B2B nature and should not include high level of personal data.

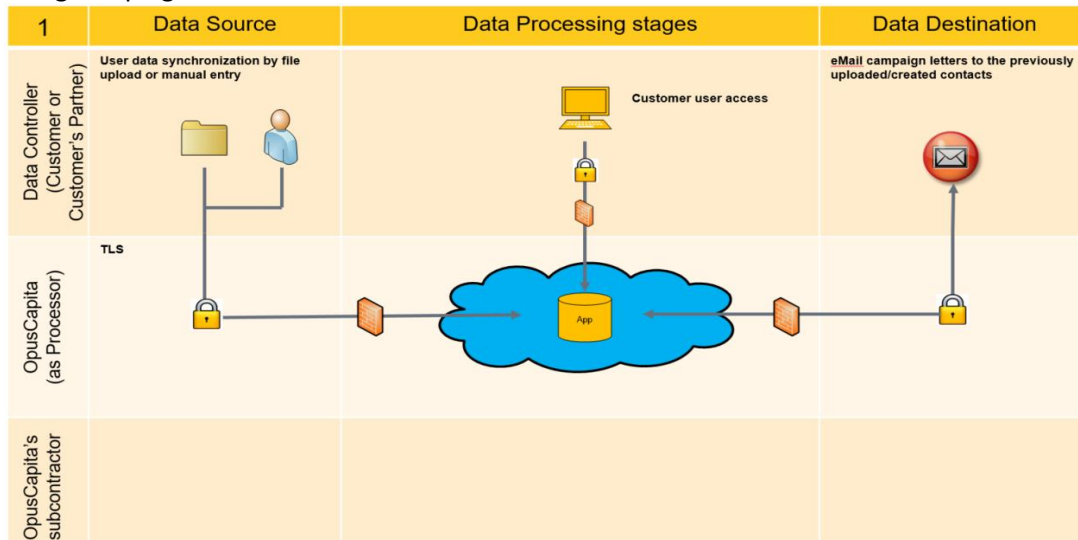
The following aspects are mentioned but not considered because those are handled in another product (B2B integration) and the source of the data is expected to be B2B nature without personal information.

- Content of some electronic B2B document exchange (B2B integration, Invoice Sending or Invoice Receiving) for trade, invoicing and collaboration, which MAY contain personal data, related to Order processes, service requests with personal data details, Invoice content or in attachment. It may be subject of Customers employee's and/or Suppliers employee's personal data.

Understanding the data flow and the processing stages

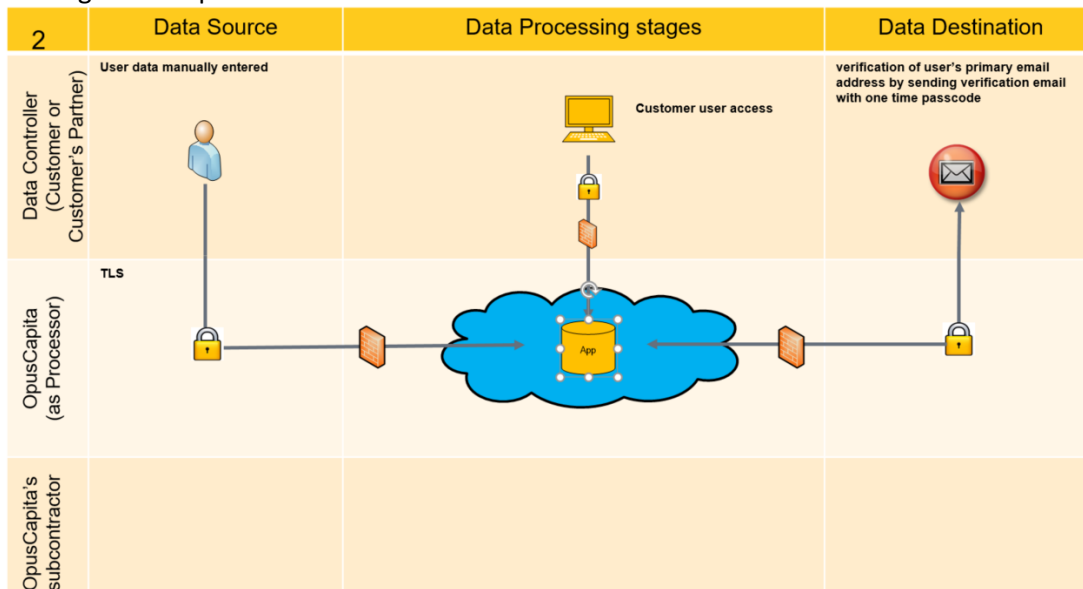
Full data flows diagrams per different feature sets which may contain personal data are presented in diagrams below.

1. Onboarding campaigns

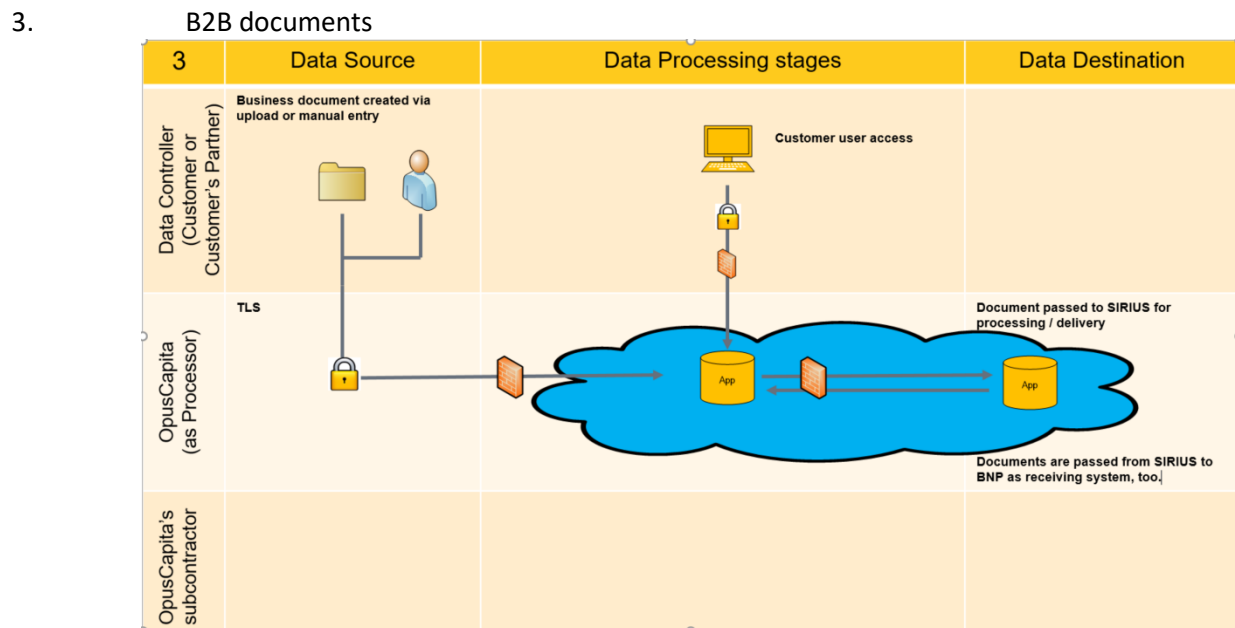


Contact information is being entered by company administrators in self-service or bulk upload. Contact information is used for notification / campaigning via email.

2. Registration process



User data is being entered by the user in the self-registration process using web forms. The data will be used for authentication as well as notifications (email).



Why does OpusCapita Business Network Portal process personal data?

OpusCapita acts as an extension of PROCESSOR of the electronic B2B document exchange between the trading partners and has a minor controller role in the basic identification data of the users registering into the BNP. Three basic types of datasets are required to fulfill the product requirements.

Dataset (A) is contact information entered by customer's users in order to define the escalation contacts within their own company, whereas onboarding campaign recipients are basically entered by customer and contacts are in supplier companies.

Dataset (B) is identification data for accessing BNP where OpusCapita defines goal and purpose of processing the data within Business Network Portal. OpusCapita defines how long data are needed to be stored to fulfill business and legal requirements. Personal data received from Customers (system users) or from Suppliers (system users) are based on agreements between parties, as necessary element for providing services.

Dataset (C) is information included in electronic B2B document exchange for trade – OpusCapita defines processes for which detail data are needed to fulfill agreed services and to fulfill a legal requirement for accounting. Personal data are used only for that purpose.

In all cases OpusCapita has legitimate interest to process personal data to fulfill agreed services.

OpusCapita use Personal Data in Business Network Portal only to fulfill support agreements with Customers/Suppliers and to deliver support services for users.

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).

Categories of Data Subjects whose Data will be processed include the following:

- Customers
- Users (Suppliers)
- OpusCapita employees

There are several types of BASIC personal data handled in Business Network Portal. The different categories of Data to be processed under this DPIA may include the following:

- The A and B datasets include identification data for accessing: name, organization, e-mail, phone number, language, country, salutation, birthday, degree, telefax and office address - BASIC type.
- The C dataset include electronic B2B document exchange for trade: any data entered by an initiating party related to Order, Service, Invoice or any other related in Customers or suppliers B2B business.
- BNP is also extracting BASIC level personal data from B2B documents transferred through OpusCapita messaging platform and described in B2B integration DPIA. That data is expected to be B2B nature without personal information. However, some content of electronic B2B document exchange (B2B integration, Invoice Sending or Invoice Receiving) MAY contain personal data and is not under OpusCapita's control.

Who administers data processed and stored in the Business Network Portal?

OpusCapita Business Network Portal cloud solution is hosted on platform delivered by an ISO 27001 certified European service provider (Microsoft Azure) and all servers are physically located inside EU area. Solution is accessible via secure internet connections (https:) from workstation's browsers.

As of today, all data are kept as long as the system is in operation - no deletion of historical data unless otherwise agreed with the Customer (system is in use since Autumn 2017). Customer should instruct OpusCapita about their document / information retention preferences to ensure necessary archives/logs are maintained.

Service Provider (OpusCapita) is through its subcontractor (Microsoft) responsible for maintenance of servers, databases, backups and data security within platform and interfaces.

OpusCapita has dedicated administration team (customer service) responsible for assisting in maintenance of user rights and groups, user interfaces, integrity of data, removal of unneeded data.

Customers and Suppliers with larger number of own users, are nominating own Key Users, responsible for creating users and maintaining user rights. They are also the source of personal data entered to the system while registration and used mainly for contacting the company representatives in campaign purposes and also in case of needed support or alerts.

Some personal data may also be visible in the invoice content submitted by the supplies and accessible by the buyers. The purpose and contexts implies that the content visible in BNP will be B2B nature and should not include high level of personal data. However, OpusCapita cannot be take responsibility about the content of electronic B2B documents initiated by the trading partners.

What Technical and Organizational Measures govern the security of the Business Network Portal product?

The Business Network Portal 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 Business Network Portal?

OpusCapita provides its customers information about vendors who participate in data processing activities for the Business Network Portal 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-processor for Business Networks is the following:

Microsoft Azure
Cloud data services located in EU.