## GDPR eProcurement Product Statement

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

OpusCapita's eProcurement Suite (ePROC) is taking care, that all non-productive goods and services, required in a company, are available at the right time, in the right place and quantity, from the right supplier and under the predetermined conditions.

The ePROC Suite contains the following modules:

- OPC – Online Product Catalog: the central purchasing portal. OPC offers fast, fault-tolerant search functions for all catalogs and contracts, making it easy for users to find the right product.

- PROC – Procurement Manager: covers the processes from the requisition to the goods receipt and return management

- SSM – Self Service Manager: catalog management tool for all purchasing operations

- PROV – Provisioning Manager: common management of user data and access rights for all modules

- SIM – Supplier Information Management: supplier management tool for supplier onboarding operations. The focus is to collect and update supplier information, which is mainly provided by the supplier himself.

- RFQ – Request for Quote: helps to create enquiries for information on price and availability quickly and easily, whether regarding catalog items and services or when it comes to complex projects tenders.

- INVT – Inventory Manager: allows to store and manage the inventory information, providing real-time inventory updates to all areas of the business.

This summary focuses on the Provisioning Manager (PROV) only, which contains identification data for accessing the systems as well as an integrated rules and rights management for the functionality of all modules. In addition, this DPIA covers OpusCapita Software-as-a-Service operations of the applications only.

The following aspects are not considered because of customer specific agreements:

- Interfaces to customers' internal systems processing personal data

- Interfaces to customers' external systems processing personal data

- On-premise use of OpusCapita applications (customer specific data protection agreements applicable)

# OpusCapita

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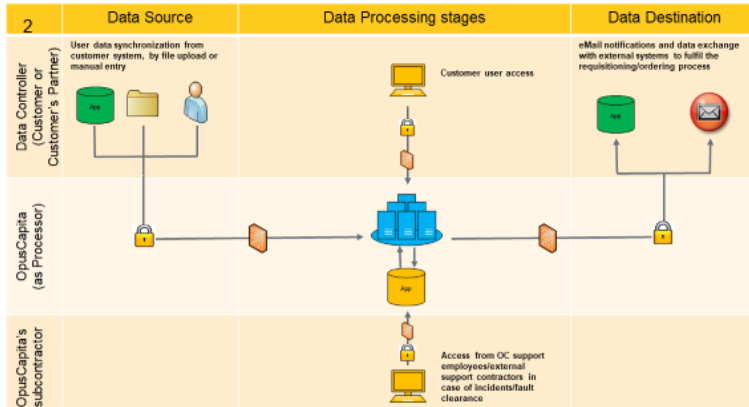


### *Why does OpusCapita OpusCapita eProcurement process personal data?*

OpusCapita is a PROCESSOR for personal data. OpusCapita uses personal data in PROV only to fulfill the technical access to OpusCapita applications.

The personal data processed in the system is related to user accounts created by OpusCapita or the CONTROLLER (customer) of the personal data. The CONTROLLER defines how long data is needed to be stored, when data needs to be changed or deleted.

OpusCapita uses personal data only to fulfill support agreements with customers.

OpusCapita has corporate policies for all subsidiaries and contracts with subcontractors to ensure the fulfilment of the data protection requirements.

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

This is a 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
- Potential Customers
- OpusCapita employees
- OpusCapita subcontractor employees

Categories of data to be processed under this DPA may include the following (not mandatory fields):

- Login-Name
- Name
- Organization
- Position/Department
- Business e-mail address
- Business postal address
- Telephone number

Regarding data security, the data stored in the system is classified as *BASIC* type.

### Who administers data processed and stored in the OpusCapita eProcurement product?

Personal data processed in the OpusCapita applications are stored in the Provisioning Manager (PROV) software module. PROV is responsible for user access as well as for managing the access rights to the technical functions of all applications of the ePROC Suite. The PROV modules have interfaces to all OpusCapita applications and processes personal data to verify the access to these applications and to log user operations. These log-files can contain the login name of each user, timestamp and the operation.

OpusCapita is responsible for the maintenance of servers, data bases, backups and data security regarding the OpusCapita applications and the platform infrastructure.

OpusCapita has dedicated service and support users who are responsible for the maintenance of users and access rights, the applications' infrastructure and fault clearance of the systems in case of technical incidents.

Customers with larger numbers of users are nominating own key users (administrators), who are responsible for creating user accounts and maintaining user roles & rights.

### What Technical and Organizational Measures govern the security of the OpusCapita eProcurement product?

The eProcurement 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 OpusCapita eProcurement?

OpusCapita provides its customers information about vendors who participate in data processing activities for the eProcurement 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 eProcurement are the following:


Scand Ltd.
Minsk, Belarus
Support, Development and maintenance of applications.

PlusServer GmbH
Köln, Germany
Hosting services agreement and data protection policy. Data center in France.