

## GDPR Invoice Automation Product Statement

### *Understanding GDPR for the OpusCapita Invoice Automation offering*

OpusCapita Invoice Automation is designed to centralize and standardize local and global accounts payable processes for maximum efficiency and control. By increasing transparency, invoice automation also reduces the risk of internal and external fraud.

OpusCapita Invoice Automation combines the entire purchase invoice handling process into one system. Enabling complete control and total visibility, we enable compliance to internal policies and external legislation. Driving automation with 3-way matching, business rules and advanced analytics, we provide measurable costs savings and efficiency.

OpusCapita Invoice Automation solution is delivered with two different models: as a cloud service (SaaS) and on-premises.

OpusCapita's cloud service is the standard delivery channel for Invoice Automation solution. OpusCapita operates the service in a harmonized service environment with standardized application configuration. The cloud service covers the required technology components, software licenses, environment administration, updates and backups of the customer data as described in this documentation.

OpusCapita also delivers the Invoice Automation solution as on-premises solution. Customer is responsible of hosting required environment and overall maintenance of the solution.

OpusCapita Invoice Automation solution consists of following products:

- e-Invoice receiving
- OC Invoices
- Matching
- Advanced Analytics
- Archiving
- Mobile application

e-Invoice receiving allows for multi-channel electronic invoice processing to invoice workflow solution.

OC Invoices is a highly automatable invoice workflow solution which enables control and transparency over purchase invoice processing, visibility to spend and invoice approval process efficiency, and savings through reductions in manual tasks.

Matching allows for automated and errorless purchase order and/or contract based purchase invoice processing.

Advanced analytics facilitates the ability to manage key performance indicators related to procurement and purchase invoice processing. It helps to manage spend, suppliers, various internal processes related to automated purchase-to-pay chain, and cashflows.

Archiving solution allows to lawfully preserve the purchasing documents. Archiving allows to access the historical invoices quickly and conforms with the legal requirements of record management and retention.

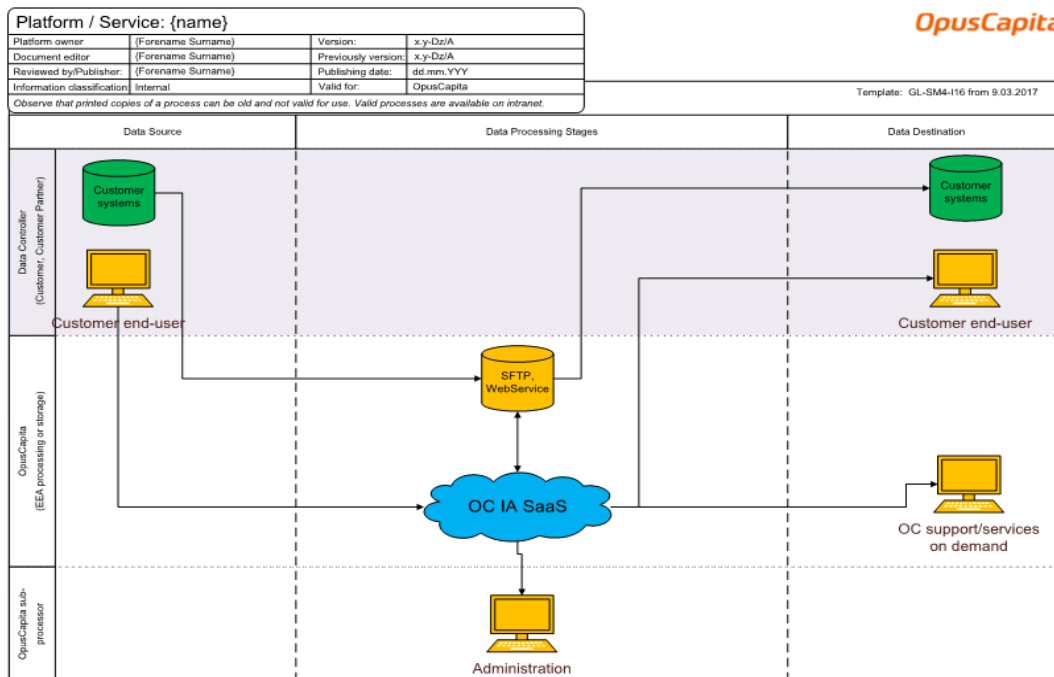
Mobile application allows together with the OC Invoices solution for easier purchase invoice processing as reviewing and approving of the invoices can be done via the supported native mobile clients.

OC Invoices, Matching, Archiving, and Mobile application share a common Platform which provides shared master data and common features to all products. Advanced Analytics is hosted on its own platform and is based on Qlik® technology. e-Invoice receiving is a part of the total Invoice Automation solution offering but considered out-of-scope of this Product Statement record. The thorough Product Statement record for e-Invoice receiving can be found in Product Statement record of OpusCapita Business Network

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

- integrated 3<sup>rd</sup> party customer systems including but not limited to ERP, A/P, sourcing, payroll, TMS, travel expense, and external archiving systems.
- other connected systems such as OpusCapita procurement solutions.
- e-Invoice receiving

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



**Why does OpusCapita Invoice Automation process personal data?**

Customer is the CONTROLLER and PROCESSOR of personal data processed on OpusCapita Invoice Automation solution.

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 its employees have otherwise no role as CONTROLLER or PROCESSOR of personal data on OpusCapita Invoice Automation solution.

### ***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 several types of personal data handled in OpusCapita Invoice Automation solution:

- For (A) identification data for accessing: username, name, e-mail, mobile number – BASIC type.
- For (B) data content: any personal data of other persons (not end-users of the application) related to product processes, may include EXTENDED or SENSITIVE type.

Details are presented in enclosed document (stored on secured and dedicated GDPR Record folder):

Identification data (A) is needed by OpusCapita IA solution to identify, authenticate and authorize a user in the system.

Data content (B) is used by OpusCapita customers to handle their finance and accounting processes as required by their business need. Moreover, the data included in this category may be comprised of information that is disclosed in invoice data (invoice image, e-invoice data, invoice attachments). This type of data originates from third party and is not monitored prior to import of the data to Invoice Automation solution. Depending on the business need Invoice Automation solution offers measures to remove and/or hide this type of data content.

OpusCapita IA solution saves all personal data to databases. In cloud delivery model, OpusCapita is responsible of storage, maintenance and backups of the databases. In on-premise delivery model, Customer is responsible of storage, maintenance and backups of the databases.

Customer is responsible of the deletion of the data on both delivery models. OpusCapita does not delete any personal data from the IA solution automatically.

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

OpusCapita Invoice Automation cloud solution is hosted on platform delivered by an ISO 27001 certified European service provider and all servers are physically located inside EU area. Solution is accessible via secure internet connections (https:) from workstation's browsers. Some older parts of the software may be used by some customers via Citrix.

OpusCapita Invoice Automation on-premise solution is hosted on a platform selected by the customer. Customer is solely responsible of the platform maintenance and security.

Customer is responsible for maintenance and removal of all data stored in OpusCapita Invoice Automation solution. Customer may request help from OpusCapita customer support to troubleshoot and solve an issue that requires an OpusCapita customer support employee to access the customer's environment.

***What Technical and Organizational Measures govern the security of the for the Invoice Automation product?***

The Invoice Automation 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 Invoice Automation?***

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

Elisa Appelsiini Oy  
Helsinki, Finland  
Data center in Finland

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

Ahlstedt Ström & Keinänen Consulting Oy  
Vantaa Finland  
Customer projects and consultation