

## GDPR Invoice Receiving Product Statement

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

OpusCapita's Invoice Receiving is a product for efficient receiving of incoming purchase invoices. It is provided as a Service to the Customer. The Service helps companies and organizations to automate account payable data entry by extracting business critical financial information from the invoice. After processing of the invoices the electronic image of the invoice and captured data are sent to the Customer (or to another OpusCapita service), in a pre-defined way and format for further processing. Invoice Receiving includes following receiving channels:

- E-Invoice Receiving: The Service supports invoices, interest invoices or credit notes. Attachments together with the invoice are supported, but there may be restrictions in this feature when the sender is served by another interconnected service provider. E-invoice infrastructure is based on agreed formats, principles and procedures between all service providers (e.g. banks, Peppol and E-invoice operators like OpusCapita).

E-Invoice receiving is processed on different messaging platforms depending on country. Subcontractors are in use.

- Email PDF Invoice Receiving: The Service enables the Customer to receive invoices as email attachments. OpusCapita allocates an email address to Customer per buyer unit.

Email PDF invoice receiving service is received on different platforms depending on country. Invoice data verification is processed by subcontractors.

- Paper invoice receiving: The Service enables the Customer to receive invoices and credit invoices on paper digitally by using OpusCapita as a receiver, digitizing and verification of invoice data before further processing.

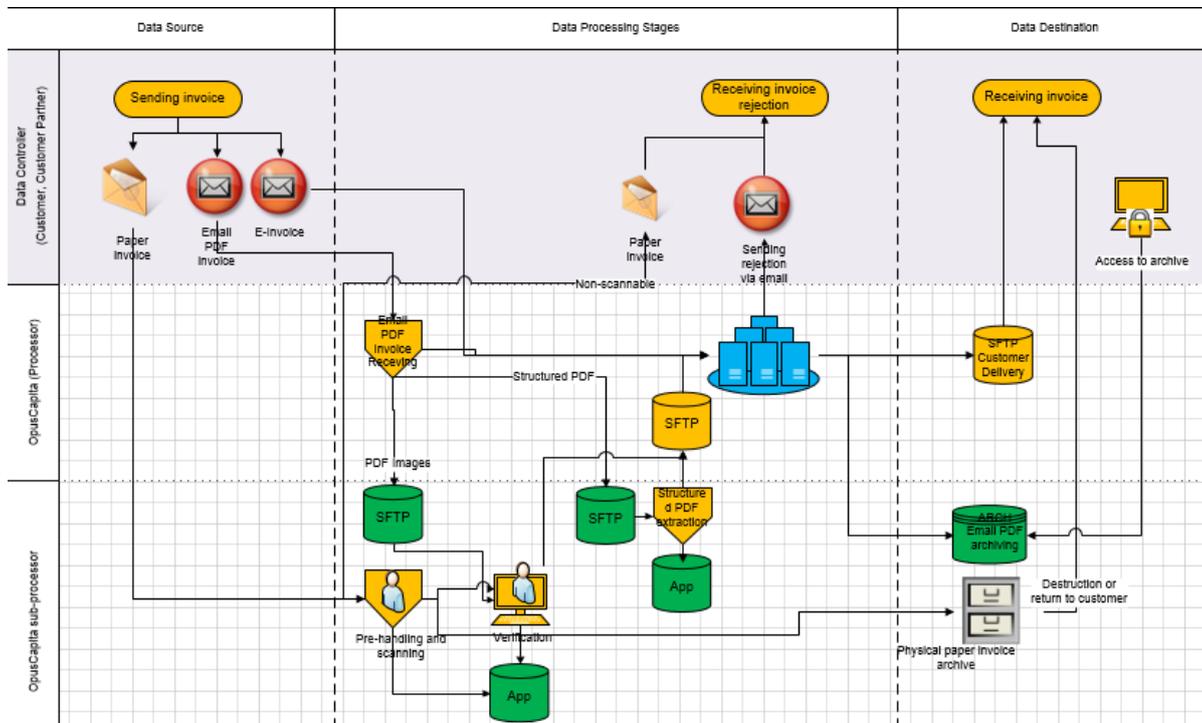
Paper invoice receiving is processed by subcontractors. Subcontractors can as well be outside EU/EEA and used when customers order paper invoice receiving services outside EU/EEA.

This assessment focuses on Invoice Receiving Service which processes document types as Invoice and Credit invoice data.

The following aspects are not considered:

- The correctness of the actual invoice data on invoices because it has been written by the issuer of the invoice.

### Understanding the data flow and the processing stages



### Why does OpusCapita Product Invoice Receiving process personal data?

OpusCapita is a PROCESSOR for our Customers personal data. The personal data processed in Invoice Receiving is in sensitivity level Basic. However, OpusCapita shall always 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.

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

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?

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 (no mandatory fields):

- Buyer and/or Supplier Name
- Buyer and/or Supplier VAT registration number
- Buyer and/or Supplier Business eMail address
- Buyer and/or Supplier postal address
- Invoice and Credit invoice data

The data stored is classified as *BASIC* type.

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

Personal Data to be processed is the invoice data existing on an invoice which has been agreed and ordered by OpusCapita's end-customer. What has been agreed is documented in a functional and/or service specification or named similar which is stored at WIKI, OC Google Drive, SalesForce and/or SharePoint.

Processing' means any operation or set of operations which is performed on personal data whether or not by automated means, such as collection, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission or otherwise making available, alignment or combination, restriction, erasure or destruction.

What kind of operation which is conducted may differ based on the service level ordered by Customer but agreed Service is documented, as mentioned, in the functional and/or service specifications.

The digital data shall not be stored at the production site or it's data centers more than 90 days if not specifically been agreed otherwise for a specific end-customer.

The physical paper invoice archive Service is separately agreed and is not included in the standard delivery.

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

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

### ***What Technical and Organizational Measures govern the security of Invoice Receiving?***

The Invoice Receiving 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 Receiving?***

Posti Messaging subsidiaries in Finland, Sweden, Poland, Estonia, Latvia

Exela Technologies subsidiaries in Sweden, Norway, Germany, Poland

OpusCapita provides upon request more detailed information about smaller vendors who participate in data processing activities for the Invoice Receiving product (sub-processors) to its customers that use the services of such vendors, typically they are scanning service providers in specific countries where customer has requested their purchase invoices to be scanned locally. 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.