

GDPR Invoice Sending Product Statement

Understanding GDPR for the OpusCapita Invoice Sending offering

OpusCapita's Invoice Sending, a product for sending outgoing messages with a multichannel approach. The product is provided as a Service to the Customer. Invoice Sending sends messages to, primarily, business customers (B2B). Invoice data is sent directly from the invoice issuer's IT system to OpusCapita's file reception service, which converts the data, then routes and delivers the messages to recipients either in electronic format or as paper via ordinary postal delivery, all messages are automatically stored. Invoice Sending consist of the following services;

- **eInvoice B2B**
Structured data i.e. messages transmitted between organizations and businesses over an operator or eDelivery network using pre-defined standard formats.
- **eMail PDF Invoice**
Semi-structured data i.e. messages transmitted between organizations and businesses over the internet using pre-defined standard formats where the message appears in a portable document format.
- **iPost and customized print**
Printing of messages in paper and in monochrome or color including enveloping and distribution to recipients i e packaging and submission according the rules of postal provider(s).
- **Portal**
An online electronic mailbox for customers to receive and archive electronic messages from organizations and businesses registered within the service.
- **eInvoice B2C**
Structured data i.e. messages transmitted between organizations and businesses over an operator network using pre-defined standard formats to be received in a netbank.
- **Mobile Invoice**
Structured data i.e. messages sent as mobile messages after a query for enrollment to database of users, who have opted in to the service, and route messages to recipients, with a presentment link to a message image.
- **eRegister**
eRegister consist of a database, where OpusCapita on behalf of customer, maintains rules on how customer's message receiver (i e customer's customer) requires to receive their messages in printed form, e-mail with an attached PDF or as an eInvoice. Customer administers the register via an

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encrypted web interface and updates the database with agreed data and receiving channels including addresses.

eArchive

Electronic archiving of customers messages including storage and retrieval of customer's electronic messages. Service is based on structured data for processing of received data to a portable document format with relevant metadata to be stored and filed according to customer's request and subsequently retrieved by customer via an encrypted web interface.

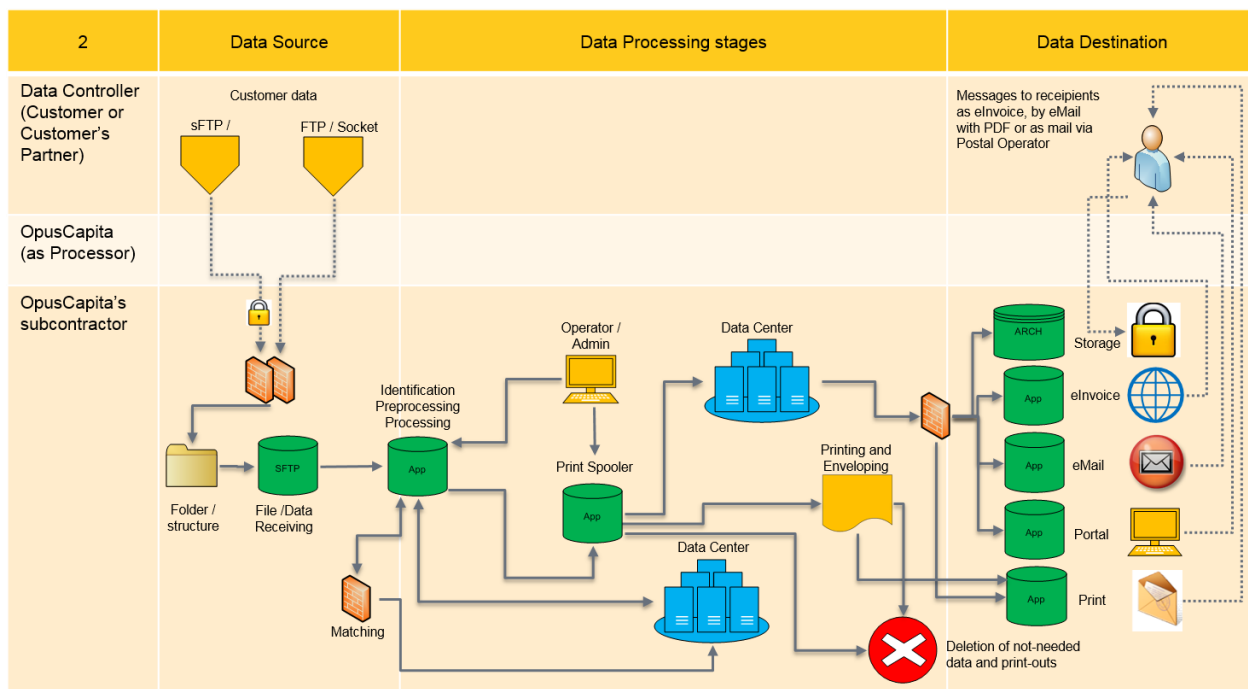
Ecosystem

Is a set of different electronic data exchange capabilities for customers to exchange different types of business messages with customer's business partners. The Ecosystem consists of the following four exchange capabilities; OpusCapita Interoperability Network, Peppol Network, Direct Connections to Business partners, OpusCapita Customer Network.

This assessment focuses on the product Invoice Sending and how it processes messages. The following aspects are not considered because of customer specific agreements:

- Interfaces to customer's internal systems processing personal data
- Interfaces to customer's external systems processing personal data

Understanding the data flow and the processing stages



CONFIDENTIAL WHEN FILED

Why does OpusCapita Invoice Sending process personal data?

OpusCapita is a PROCESSOR for personal data. The personal data processed in Invoice Sending is in sensitivity level Basic. Customer as the CONTROLLER and originator of the invoice data has the duty to inform OpusCapita if other than Basic type personal data is going to be processed, and suggest eventual additional security measures that would be required. OpusCapita recommends the data type needed for

respective feature according to this sensitivity level. Customer has received information on data type needed. However, OpusCapita always treat personal data as confidential information and 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 processes personal data, it occurs to fulfill service or support agreements with customers. Customer shall define the specific parameters of the services, such as required data retention times, in when ordering the services. 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):

- Login-name
- Business part name
- Business part VAT registration number
- Business part eMail address
- Business part postal address
- Business part invoice and credit invoice data
- Business part telephone number

Data stored in system is expected to be classified as BASIC type. OpusCapita cannot be responsible for attachments containing sensitive information as these are not processed within the scope of the product (is not extracted from the processed documents). The product is also extracting BASIC level personal data from B2B documents transferred through messaging platforms and described in Invoice Sending DPIA which are expected to be B2B nature without personal information. However, some content of B2B document exchange (Invoice Sending) MAY contain personal data.

Who administers data processed and stored in the Invoice Sending product?

Personal Data to be processed in provisioning of the product Invoice Sending for customers is the invoice data deriving from an invoice (I e file received from customer) agreed and ordered by OpusCapita's end-customer. What has been agreed is documented in a functional and/or service specification or named similar. Steps of operation may differ based on the service ordered by Customer.

Storage of digital data is dependent on country specific compliance and regulations.

Digital data shall not be stored at the production site or its data centers more than 90 days if not specifically been agreed otherwise for a specific end-customer.

OpusCapita is (through its subcontractors) 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 responsible for the maintenance of user and access rights, the applications infrastructure and fault clearance of the service in case of incidents.

Personal data processed in Invoice Sending related applications for customer user access as well as for OpusCapita managing the access rights to the technical functions of applications are stored. Interfaces to relevant OpusCapita applications and processes handles application users' 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. 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 Invoice Sending product?

The Invoice Sending 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 for Invoice Sending?

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

Posti Messaging subsidiaries of Posti Group Oyj in Finland, Sweden and Norway
Processing locations: Helsinki, Finland; Årsta, Sweden; Frysja, Norway
All services and features related to the product

Paragon Customer Communications Korschbroich GmbH
Korschbroich, Germany

Paragon receives data in a print-ready format for printing and distribution in Germany.

Inforsys SA

Poland, Inforsys receives data in a print-ready format for printing and distribution in Poland.