GDPR OC Archive Product Statement

Understanding GDPR for the OpusCapita OC Archive offering

The target and scope is the OCArchive. OCArchive is designed to store the bookkeeping documents generated by OpusCapita Invoice Automation (IA) and Cash Management (CM) solutions. OC Archive provides an integrated archiving solution that fulfills the lawful requirements of the permanent bookkeeping document archive. OCArchive allows to access the historical bookkeeping documents quickly and conforms with the legal requirements of record management and retention.

OpusCapita offers OCArchive together with IA and CM solutions which are delivered with two different models: as a cloud service (SaaS) and on-premises. Cloud service is the standard delivery channel for OpusCapita's product offering. 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 fore mentioned solutions as on-premises solution. Customer is responsible of hosting required environment and overall maintenance of the solution.

OCArchive archives data from the below products:

- OC Invoices
- Accounts
- Payments
- Treasury management (On-premise application)

The data types that may be stored in archive include

- Account specification
- Account statement
- Cash ledger
- Payment reference list
- Purchase invoice
- Contract related to purchase invoices
- Log events
- Matured forward contract
- Open forward contract
- Loan contract
- Personnel loan
- Derivative transitory

- Investment transitory

- Invoice attachment

- Loan transitory

- Receipt journal

OCArchive is not offered as a standalone solution but and needs to be acquired together with at least one data source product. Data from external source may be archived in case customer switches to use fore mentioned OpusCapita software and requires archived data migration. In this case, data is schematically verified to correspond to the fore mentioned data types.

Why does OpusCapita OC Archive process personal data?

Customer is the CONTROLLER and PROCESSOR of personal data processed on OpusCapita IA and CM solutions. OCArchive inherits information from these solutions.

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 IA and CM solutions and therefore OCArchive 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 IA and CM solutions form the basis for the OCArchive user management and authorization:

- 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 OCArchive 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.

Data types and hence data contents in OCArchive is inherited from IA and CM solutions. Therefore, the data descriptions of the respective solutions apply also to OCArchive.

OCArchive 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 from the data source solutions. OpusCapita does not delete any personal data from the from these solutions automatically. OpusCapita does not delete any records from OCArchive automatically.

Understanding the data flow and the processing stages
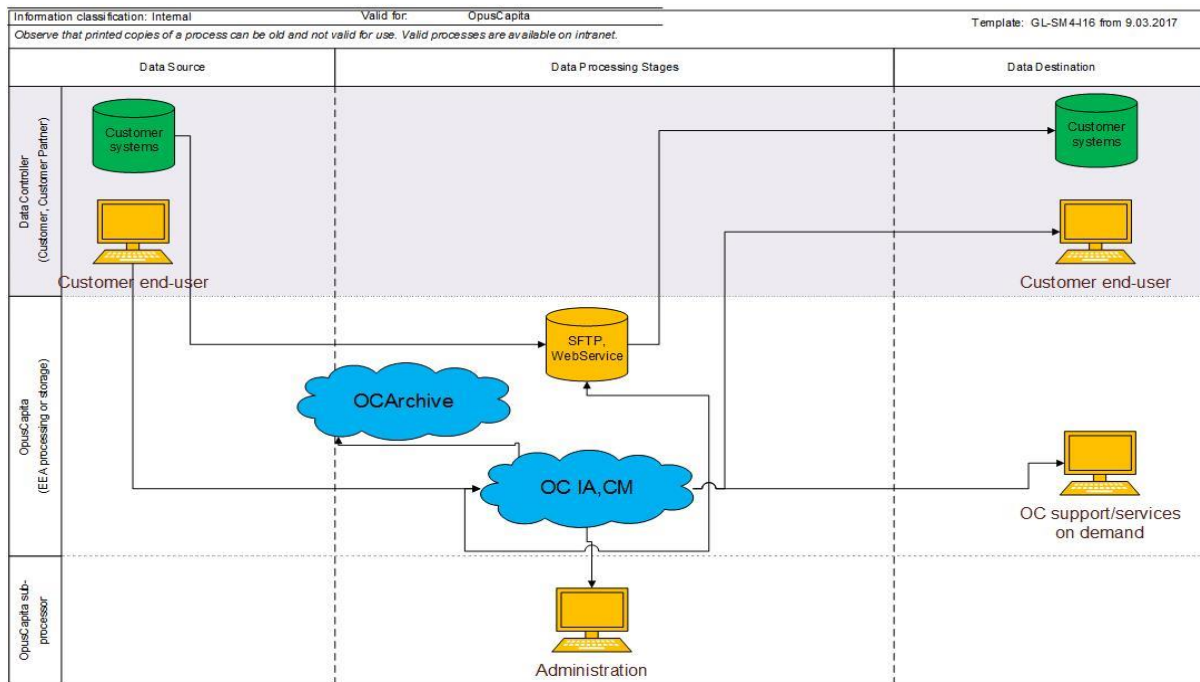
What Technical and Organizational Measures govern the security of the security for the OC Archive product?

OCArchive 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.

OCArchive 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 data source solutions of OCArchive. There are no built-in options to remove any data from OCArchive due to data retention requirements of the lawful bookkeeping document archiving. Customer may request assistance from OpusCapita to delete data records (all

data attached to single bookkeeping record) from OCArchive. 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 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 OC Archive?

OpusCapita provides its customers information about vendors who participate in data processing activities for the OC Archive 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 OC Archive 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 Finlad
Customer projects and consultation