

GDPR B2Bi SaaS Product Statement

Understanding GDPR for the OpusCapita B2Bi offering

By using OpusCapita B2B Integration Service Customer can outsource B2B message delivery including data conversions with its trading partners like Suppliers, Customers and Logistic partners. OpusCapita manages our customer business critical B2B supply chain needs with a single ERP connection. Implementation, onboarding, mapping, translation, routing, 24/7 monitoring and trading partner enablement are part of the service.

Service supports different kinds of technical formats used by the trading partners, such as Ansi X.12, Odette, UN/Edifact, Eancom, RosettaNet, Tradacoms, VDA, XML, UBL. The B2B messages (business documents) will be sent from Customer IT- systems using ERP- integration connection, translated and routed to designated recipient automatically by B2B Integration service.

OpusCapita as a business-to-business integrator takes care of two main areas:

Integrates data between Customer's internal format and the standard or proprietary formats used by Customer trading partners.

Manages reliable electronic business document data conversions and routings between Customer IT systems including other integration service providers and VAN providers within Customer's business network.

The message delivery is handled by using B2B-connections. These connections enable the electronic processing of e.g. orders, order confirmations, delivery responses, invoices, customs formalities and transport information in B2B commerce. OpusCapita's B2B Integration service includes interconnections (gateways) to other Business partner's integration service providers, which extends Business partner connectivity globally.

B2B Integration Service consist of following products:

- ERP connection
 - ERP Connection is used for communication between the customer's IT system and OpusCapita's Service Platform.
- B2B Connection

- B2B Connection is used for one type of Business message connection with one Trading partner to one direction (e.g. Outgoing Purchase Order with Trading Partner X.).
- Supplier Web
 - Supplier Web is used by Small Suppliers in which they can receive Orders, sending Order Confirmations and Invoices to Buyers which are offering this Portal to the Long tail Suppliers.
- Track & Trace Portal (Sirius-platform)
 - Track & Trace portal is a complementary service for OpusCapita's B2B Integration customer's, which provide the visibility to the partner connections, message tracking & service levels. The Customer portal is web-based service for Customer to monitoring the status of B2B Integration messages and SLA reporting. This product is used when customer solutions are implemented on Sirius Platform.
- Web Watch Dog (WWD) (XIB-platform)
 - WWD provides the Customer with access to the B2B Integration service's log data via a web interface. This enables the Customer to carry out checks itself and answer queries from both its internal organization and its business partners. WWD has been developed to offer the Customer greater control over monitoring opportunities. This product is used when customer solution is implemented on XIB Platform.

OpusCapita's B2B Integration Service is offered as Cloud based multitenant Service to our customers. The Service Platforms include all licenses, hardware, and software. OpusCapita is responsible for setting up the service, monitoring connections and maintaining it. OpusCapita has 2 different multitenant Platforms which are managing mapping, translation, routing, monitoring, and connectivity of the continuous Service. These platforms are:

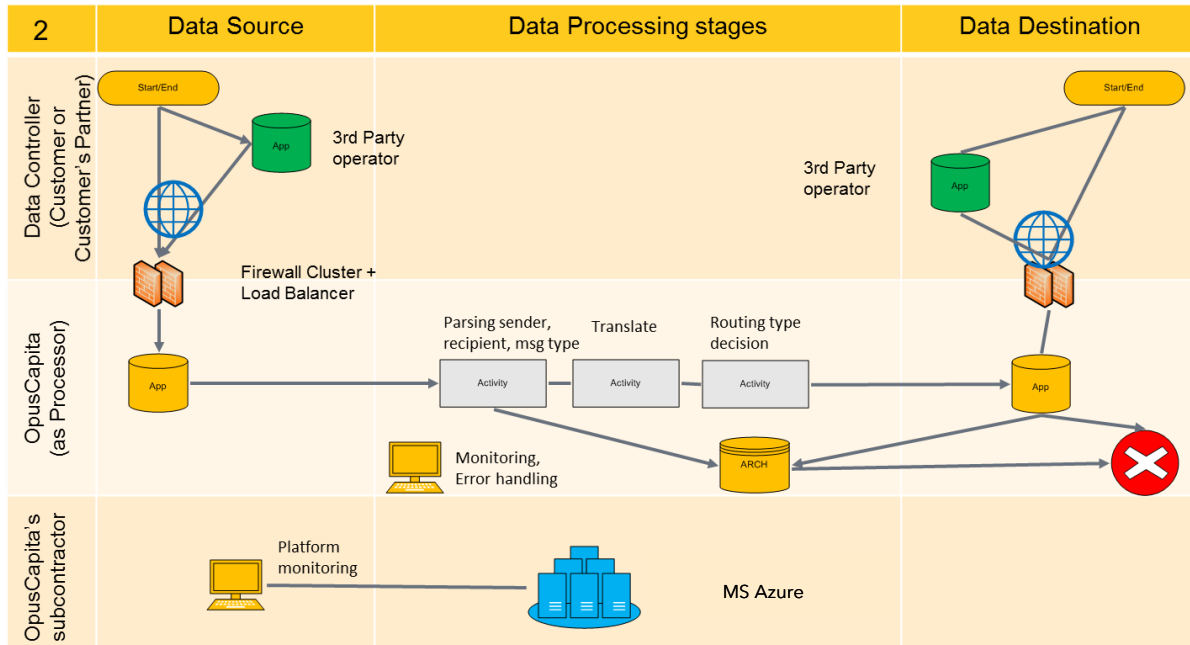
- XIB
- SIRIUS

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

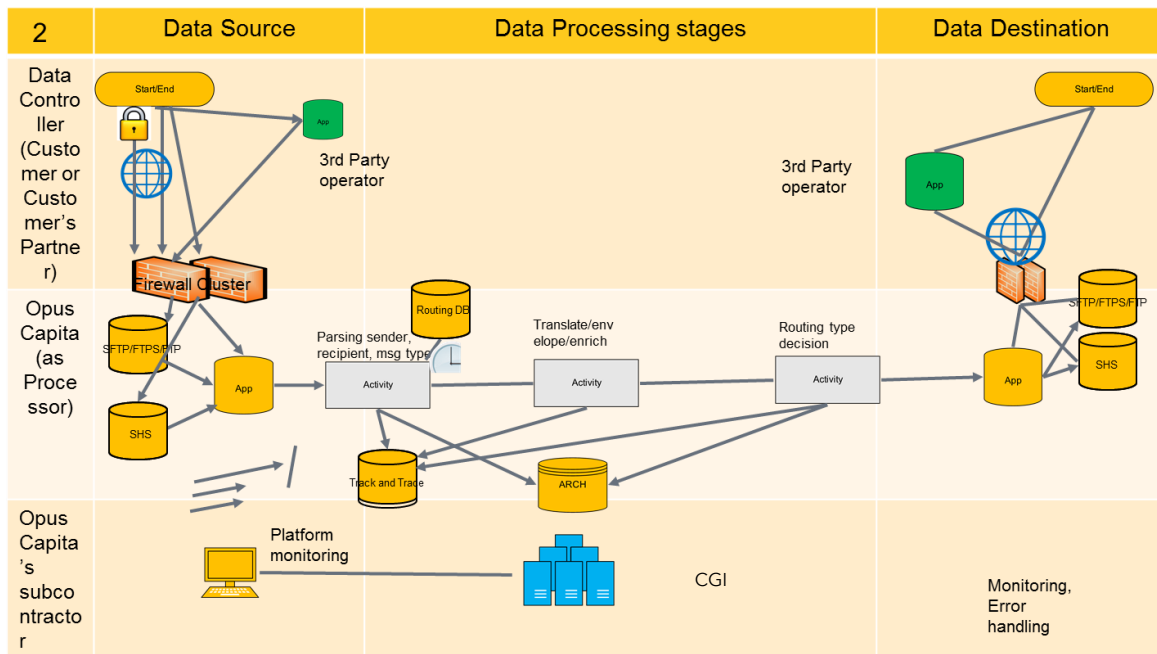
- Integrated 3rd party customer systems such as ERP, EAI or Databases.
- Other connected Gateways or Service Providers which are part of the Supply Chain Process.

Understanding the data flow and the processing stages

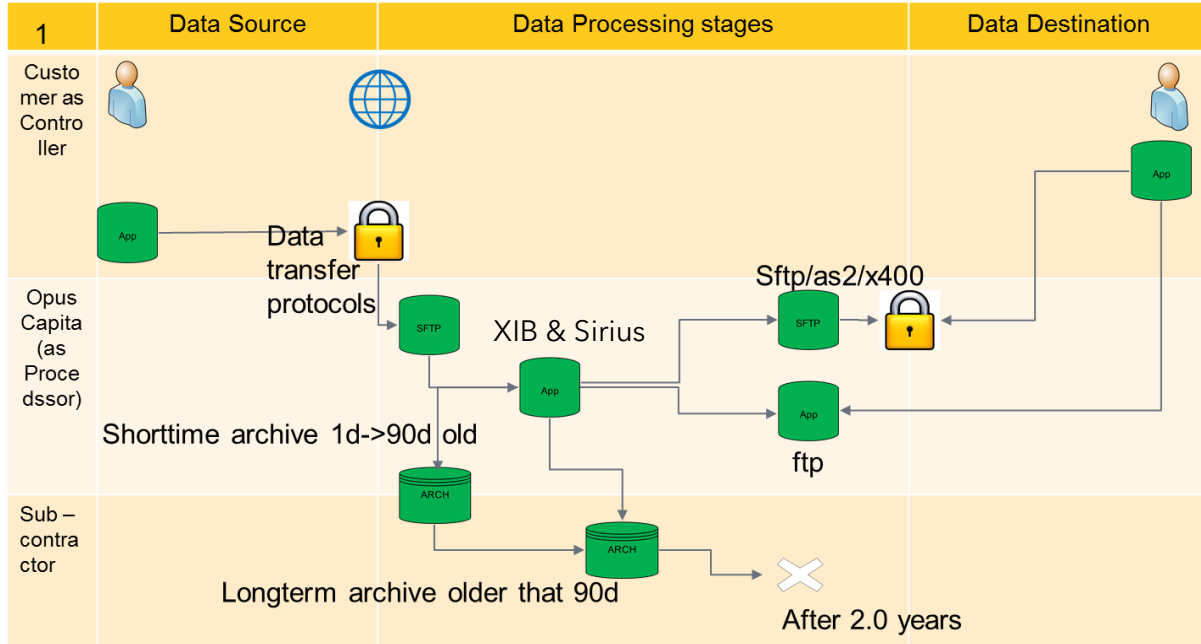
Sirius



XIB



Archiving process looks similar for both XIB and Sirius



Why does OpusCapita B2Bi process personal data?

The customer is the CONTROLLER and PROCESSOR of personal data processed on B2B Integration Service.

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 how 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 with agreement between OpusCapita and the Customer.
- Processing in accordance with 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 B2B Integration Service.

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 three (3) types of personal data handled in B2B Integration service:

- For (A) Business to Business Trade information: company name, username, name, e-mail, phone number, company address - BASIC type.
- For (B) user data in Portal applications part of the service (Supplier Web, Track&Trace Portal, WWD): Login-name, Name, Company, email, phone number - BASIC Type.
- For (C) third party data content used in Population Centre information: sensitive personal data of other persons (not end-users of the service) related to product process, include SENSITIVE type such as date of birth, death, medical condition - SENSITIVE Type.

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

- XIB-platform: GL-SM8-C15_DataTypes_XIB_V0.1.xlsx
- SIRIUS-platform: GL-SM8-C02_DataTypes_Sirius_V0.1.xlsx

Data content (A) is used by OpusCapita customers to handle their Supply Chain, Purchasing, Logistics and Sales processes as required by their business need.

Identification data (B) is needed by B2B Integration Portal solutions to identify, authenticate, and authorize a user in the system.

Data content (C) is used by OpusCapita customers (1 Customer) to handle their Population Centre Registration Data with Finnish Population Centre.

B2B Integration Service saves all personal data to databases. OpusCapita is responsible for storage, maintenance, and backups of the databases.

The customer is responsible of the deletion of the data. OpusCapita does not delete any personal data from the service automatically.

Who administers data processed and stored in the B2Bi product?

Depending on Service Platform B2B Integration Service is hosted on European hosting partner and all servers are physically located inside EU area. Web Portal Parts of the Solution (Supplier Web, Track&Trace, WWD) are accessible via secure internet connections (https:) from workstation's browsers.

OpusCapita is responsible for setting up the service, monitoring connections and maintaining it as managed Service for customers. The customer is responsible for the removal of all data stored on B2B Integration Service. Removal of business documents and related data from short term storage can be done at the Customer's request to OpusCapita ServiceDesk. Following storage rules will apply:

- All Customer business documents are stored before and after transformation.
- Data is stored in short term storage for 90 days.
- Data is stored in long term storage after 90 days period.

Where can the customer get additional information for GDPR safeguards and security for B2Bi?

The B2Bi 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 take place.

What efforts have been made for Privacy compliance training?

All OpusCapita employees are required to participate in training in 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 also included 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 considered when designing solutions.

Who are the key partners or vendors who assist OpusCapita to process data in B2Bi?

OpusCapita provides its customers with information about vendors who participate in data processing activities for the B2Bi 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 B2Bi are the following:

Microsoft	Azure cloud services for Messaging Platform (SIRIUS), backups, storage	Invoice image, meta data extracted; eInvoice; EDI messages; user identification data	EU	Hosting Subcontractor
CGI	Data Center Services for Messaging Platform (XIB), backups, storage	Invoice image, meta data extracted; eInvoice; EDI messages; user identification data	Sweden	Hosting Subcontractor

