

## **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' is 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.

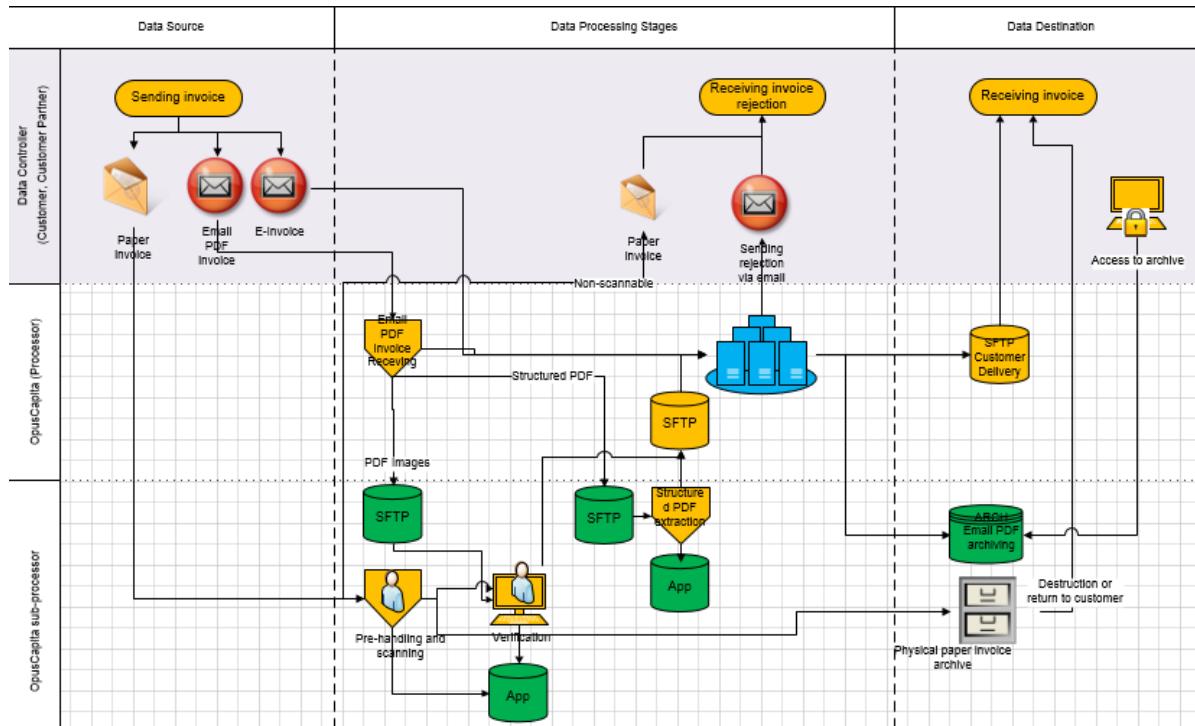
Paper invoice receiving is processed by subcontractors. Subcontractors can as well be outside EU/EEA and used when customers order paper invoice receiving services outside EU/EEA.

This assessment focuses on Invoice Receiving Service which process' 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 with agreement between OpusCapita and the Customer.
- Processing in accordance with 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 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**

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

## **Where can the customer get additional information for GDPR safeguards and security for 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 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 Invoice Receiving?**

OpusCapita provides its customers information about vendors who participate in data processing activities for the Invoice Receiving 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 Receiving are found here [List-of-OpusCapita-subprocessors-20220928.pdf](#)

TWI Kanunnik TRIEST vzw  Linthoutbosstraat, 37 B-1200 Brussel	Scanning partner	Invoices  Credit invoices	Belgium
---	------------------	---------------------------------	---------

# OpusCapita

Posti Messaging Oy Postintialval 7 FI-00230 Helsinki	Scanning and verification Partner	Invoices Credit invoices	Finland
Posti Messaging Oy Postintialval 7 FI-00230 Helsinki <i>Posti Messaging OÜ</i> <i>Tartu mnt. 43,</i> <i>10128 Tallinn</i>	Scanning and verification Partner	Invoices Credit invoices	Estonia
Tessi Documents Services  116 rue de Silly 92100 Boulogne Billancourt	Scanning and verification Partner	Invoices Credit invoices	France
Exela Technologies AB  Västberga Allé 36A Box 90 210 120 23 Stockholm	Scanning and verification partner	Invoices Credit invoices	Sweden
Exela Technologies AB  Västberga Allé 36A Box 90 210 120 23 Stockholm <i>BancTec GmbH</i> <i>Plauenerstrasse 163-165</i> <i>Gebäude H/Haus 8</i> <i>13053 Berlin</i>	Scanning and verification partner	Invoices Credit invoices	Berlin
Exela Technologies AB  Västberga Allé 36A Box 90 210 120 23 Stockholm <i>Exela Technologies AS</i> <i>Nedre Rommen 5c</i> <i>0988 Oslo</i>	Scanning and verification partner	Invoices Credit invoices	Norway
Exela Technologies AB  Västberga Allé 36A Box 90 210 120 23 Stockholm <i>Exela Technologies Sp. z.o.o.</i>	Scanning and verification partner	Invoices Credit invoices	Poland

# OpusCapita

ul.Grudziadzka 46-48 87-100 Toruń			
Database C.P.M. Lda  Abruñheira Business Center Edifício 5 2710-056 Sintra	Scanning Partner	Invoices  Credit invoices	Portugal
Database C.P.M. Lda  Abruñheira Business Center Edifício 5 2710-056 Sintra  Database C/ Mahón 8, 1º Parque Rozas 28230 Las Rozas (Madrid)	Scanning Partner	Invoices  Credit invoices	Spain
Quadient UK Limited  69 Buckingham Avenue Slough SL1 4PN	Scanning Partner	Invoices  Credit invoices	UK
Ash Conversions International (ACI)  6201 Hwy 7 #1, Woodbridge, ON L4H 0K7 (866) 340-9774	Scanning Partner	Invoices  Credit invoices	Canada
Imaging Office Systems Inc  4505 East Park 30 Drive Columbia City, IN 46725 USA	Scanning Partner	Invoices  Credit invoices	US
Advanced Data Automation Ltd  1 Redcliff St, Bristol, City of Bristol BS1 6NP	PDF Extraction application provider	Invoices  Credit invoices	UK

# OpusCapita

ECIT Digital AS Stadionveien 4, 7898 Limingen, Norway	Scanning and verification partner	Invoices Credit invoices	Norway
ECIT Digital AS RaceIT Digital SRL  Bulevardul Mihai Viteazu, nr. 18, sc. C, et. 2 ap. 77, Sibiu, Romania	Validation of data	Invoices Credit invoices	Romania
ECIT Digital AS Attest.nu I Sverige AB  Midgårdsgatan 2 831 45 Östersund	Scanning and storing of paper invoices	Invoices Credit invoices	Sweden