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GDPR Invoice Sending Product Statement

Understanding GDPR for the OpusCapita Invoice Sending offering

Invoice Sending is a managed service that enables efficient and secure distribution of outgoing sales invoices. It is provided as a service to the Customer and designed in alignment with GDPR and applicable data protection regulations. The service supports organizations in automating **accounts receivable processes** by extracting financial information from the invoice files during initial pre-processing and validation of data against agreed rules.

After processing, the validated data and invoice files are delivered to recipients through the predefined and contractually agreed methods and formats. Unless otherwise specified, the service supports invoices, credit notes and reminders via delivery channels such as eInvoices (B2B/B2G/B2C), PDF invoices by email, and paper invoices distributed through postal operators. Invoice Sending includes the following service components

- **eInvoice B2B**
  Structured data i.e. messages transmitted between organizations over an operator or electronic delivery network using pre-defined standard formats. The infrastructure, i.e. electronic delivery network is based on agreed formats, principles and procedures between all service providers (e.g. banks, Peppol and E-invoice operators like OpusCapita).

- **eInvoice B2C**
  Structured data i.e. messages transmitted between organizations over an operator network using pre-defined standard formats to be received in a netbank.

- **Portals**
  An online electronic mailbox for customers to receive and archive electronic messages from organizations and consumers registered within the service.

- **eMail PDF Invoice**
  Semi-structured data i.e. messages transmitted between organizations over the internet using pre-defined standard formats where the message appears in a portable document format.

- **Print and Postage**
  Printing of messages in paper and in monochrome or color including enveloping and distribution to recipients i e packaging and submission according to the rules of postal provider(s).

- **Track and Trace, Archive**
  Monitoring and 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 interface.
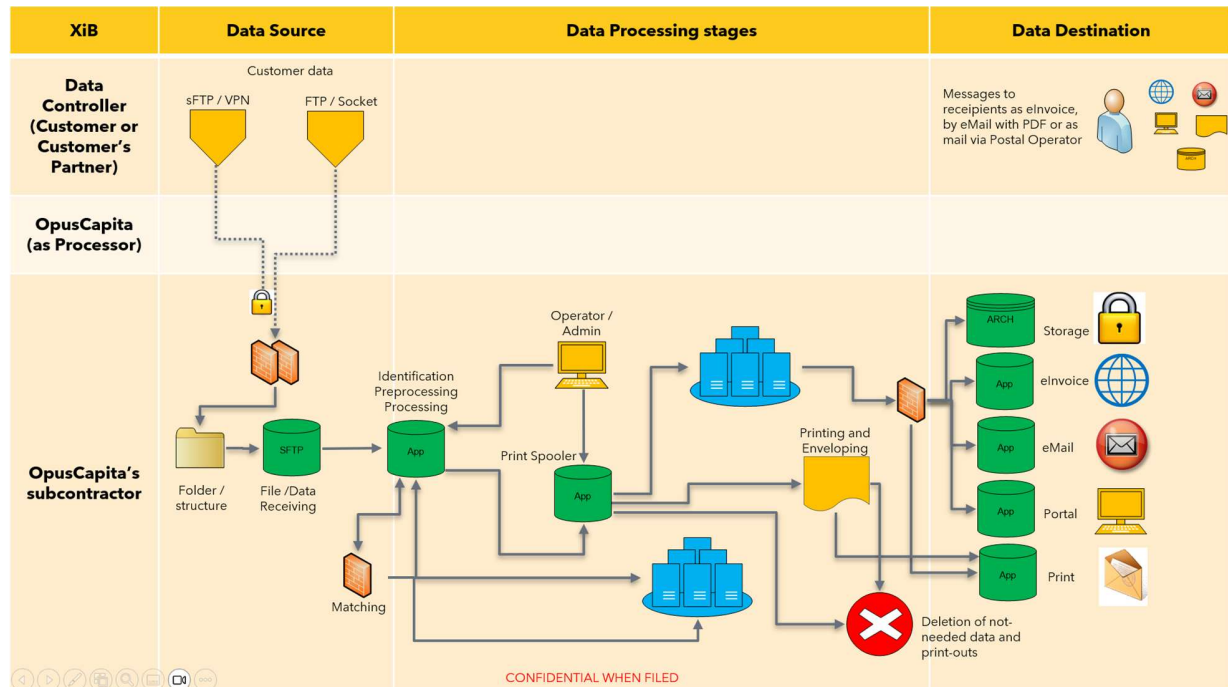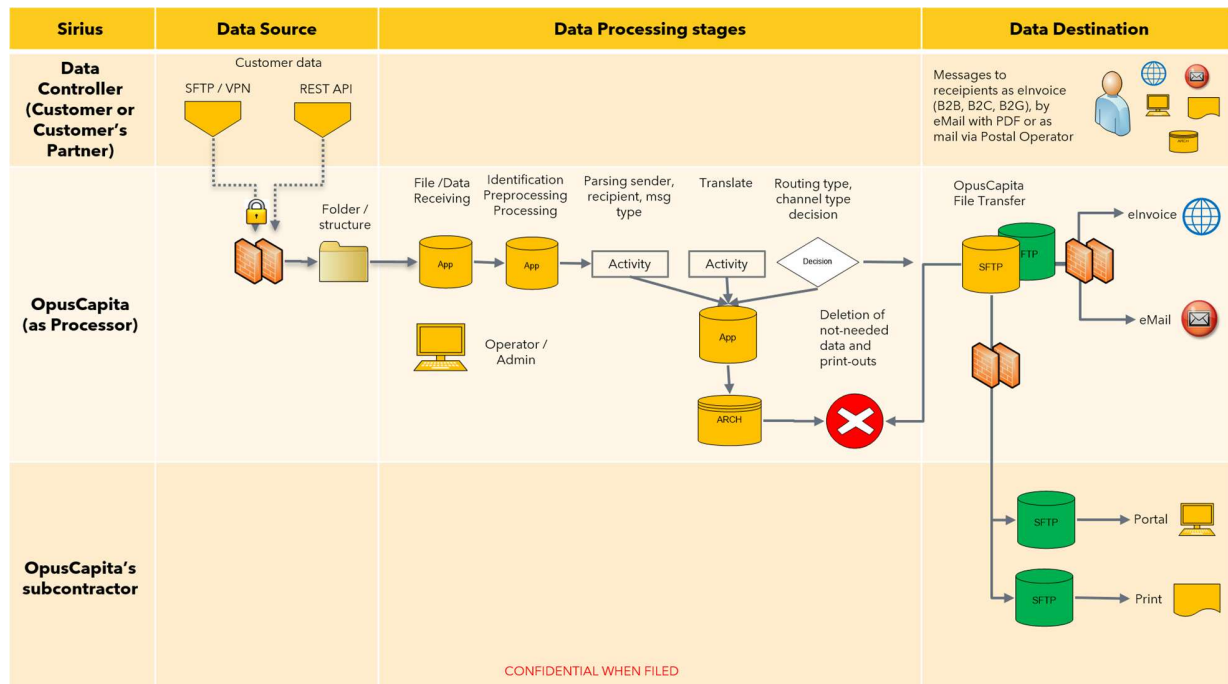
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- **Ecosystem**
  Is a set of different electronic data exchange capabilities for customers to exchange different types of business messages with customer's business partners. The Ecosystem consist of the following four exchange capabilities; OpusCapita 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

- 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 Invoice Sending process personal data?

OpusCapita is a PROCESSOR for personal data. The personal data processed in Invoice Sending is in sensitivity level Basic. OpusCapita recommend the data type needed for respective feature according to this sensitivity level. Customer has received information on data type needed. However, OpusCapita always treats personal data as confidential information and only processes 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, it's 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:

- Customer employees and representatives – e.g., individuals responsible for issuing, approving, or managing invoices.
- End customers (invoice recipients) – natural persons receiving invoices in B2C transactions or contact persons at customer organizations in B2B/B2G contexts.

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- Suppliers or third parties – where credit notes or related financial documents involve identifiable individuals.

Categories of Data to be processed under this DPA <u>may</u> include the following (no mandatory fields):

- Identification and contact information (e.g., name, role, business address, email, phone number).
- Financial information necessary for invoice processing (e.g., invoice number, bank details, tax identification numbers, payment references).
- Transaction-related data (e.g., purchase order references, contract numbers, delivery details).
- Communication metadata were applicable to invoice delivery channels (e.g., email headers, electronic delivery status, postal references).

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. 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.

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. Steps of operation may differ based on the service ordered by Customer.

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

OpusCapita is responsible for the maintenance of servers, databases, 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

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are stored. Interfaces to relevant OpusCapita applications and processes handle 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 nominate their own key users (administrators) who are responsible for creating user accounts and maintaining user roles & rights.

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

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 take place.

What efforts have been made to provide 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 in 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 ensure

GDPR requirements are considered when designing solutions.

Who are the key partners or vendors who assist OpusCapita to process data for Invoice Sending?

OpusCapita provides its customers with 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 found on Information security and data protection - OpusCapita

The sub-processors for Invoice Sending 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

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21 GRAMS	Subcontractor for printing and enveloping in Sweden, Norway and Finland	21 GRAMS receives data in a print-ready format for printing and distribution.	Sweden, Norway, Finland	Printing partner
Datev	Subcontractor for printing and enveloping in Germany	Datev receives data in a print-ready format for printing and distribution.	Germany	Printing partner
BrandSign	PDF invoice data generation (i.e. layouting) and e-mail pre-processing	BrandSign receives data to generate a print-ready format.	Sweden	Layouting partner
eFaktura-bolaget	eFakturabolaget upholds a service for the delivery of invoices to connected netbanks.	eFakturabolaget provides a infrastructure service where OpusCapita customers can access and send electronic invoices and credit notes to bank customers	Sweden	Portal provider
Kivra	Kivra delivers invoices to their portal on behalf of OpusCapita´s customers.	Kivra provides a digital mailbox service where recipients can receive electronic invoices and credit notes	Sweden	Portal provider
Mina Meddelanden	Mina Meddelanden delivers invoices to their portal on behalf of OpusCapita´s customers.	Mina Meddelanden provides a digital mailbox service where recipients can receive electronic invoices and credit notes	Sweden	Portal provider
Posti	OmaPosti delivers invoices to their portal on behalf of OpusCapita´s customers.	Posti (OmaPosti) provides a digital mailbox service where recipients can receive electronic invoices and credit notes	Finland	Portal provider