

GDPR PRODUCT FILE**Phineq****1. Type of Processing**

Platform for the management of (family) assets which, based on the possessions, the composition of the family and the concrete financial objectives, provides an overview of the family assets now and in the future and makes calculations to be able to give advice in the following areas:

- Succession planning
- Composition of assets (investment decisions)
- Portfolio optimisation based on investment horizons and risk tolerance
- Cash flow optimisation and budget management
- Risk management in the event of premature death or disability

The Personal Data Processors in this tool are Wolters Kluwer Belgium NV and Target Funding Solutions gcv.

2. Categories of Personal Data processed

The Processor will only process the following categories of Personal Data in the context of this Addendum:

- identity data (name, address, mobile phone number, e-mail address, date of birth, number plate, IP address, etc.)
- identity data issued by the government (identity card number)
- contact information (address, e-mail address, IP address, IMEI, etc.)
- social status (family situation)
- financial information (bank account number, salary, properties, loan, mortgage, investment, payment behaviour, etc.).

3. Categories of Data Subjects

- customers of the Controller
- own employees of the Controller

4. Purposes of the processing

- financial management and tax (asset) planning
- business analytics relating to the Controller's customer portfolio

5. Retention period

Personal Data will be processed and retained for the following periods:

Login data: for the duration of the Agreement.

Personal data entered: for the duration of the Agreement. After the end of the Agreement, the Personal Data are permanently deleted after three months.

Personal data via helpdesk support: are deleted immediately once the case has been resolved.

6. Security measures

Technical and organisational measures can be considered state of the art at the time of the conclusion of the Service Agreement. The Processor will assess technical and organisational measures after a period of time, taking account of costs of implementation, type, scope, context and objectives of the processing and the risk of differences in the degree of probability and gravity for the rights and freedoms of natural persons.

Detailed technical and organisational measures:	
Access control: buildings	<p>Access to Wolters Kluwer buildings is controlled by both technical and organisational measures: access control with personalised badges, electronic locking of doors, reception procedures for visitors.</p> <p>Access to Target Funding Solutions buildings is controlled by both technical and organisational measures: access control, electronic locking of doors, reception procedures for visitors.</p>
Access control: systems	Access to networks, operational systems, user administration and applications requires the necessary authorisations: advanced password procedures, automatic time-out and blocking for incorrect passwords, individual accounts with histories, encryption, hardware and software firewalls.
Access control: data	Access to the data themselves is controlled by organisational measures: user administration and user accounts with specific access, personnel trained in data processing and security, separation of operational systems and test environments, allocation of specific rights and recording of history of use, access and deletion.
Encryption of data:	In transit.
Ability to ensure continued confidentiality, integrity, availability and resilience of processing systems and services:	Separation of production and test environment and rights to these, advanced password procedures.
Ability to restore the availability of and access to the Personal Data on a timely basis in the event of a physical or technical incident:	Uninterrupted power supply, backup data centres at different locations, security systems in the event of fire or water damage (extinguishing systems, fire-resistant doors, fire detectors).
Process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures to ensure processing security:	Ad hoc penetration testing.

7. Subprocessors

The following Subprocessor(s) provide(s) services by order of Wolters Kluwer and Target Funding Solutions with regard to Personal Data:

Name	Address	Purpose of use
TRI-S	Molenstraat 53, 9690 Kluisbergen	Development
EntryPoint	Stationsstraat 234, 8540 Deerlijk	Cloud hosting

8. Transmission of Personal Data

The Personal Data are not transmitted outside Belgium.