

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

Integration with our accounting products Expert/M Plus, Vero, Top Account and Adsolut.

Automated processing and archiving of documents which are then sent to the accounting software and processed in the accounts.

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, email address)
- contact information (name of contact person)
- financial information (bank account numbers, loans, mortgages, investments, payment behaviour, ratings, etc.)

3. Categories of Data Subjects

- Controller's customers
- Controller's own employees

4. Purposes of the processing

- finances (processing and archiving of accounting documents)

As part of our ongoing efforts to improve the quality and functionality of our software/product, we collect and analyse data on the use of our products. The data collected is used exclusively for the following purposes:

- Identifying and resolving technical problems and bugs
- Optimising the user experience and interface
- Developing new features and improvements tailored to user needs and preferences
- Perform general product analysis to improve the efficiency and effectiveness of the software

5. Retention period

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

Personal Data entered: for an indefinite period after the end of the agreement if the user decides (pays) to continue consulting archive.

Personal Data via helpdesk support: unknown how long personal data are retained after the end of the agreement, but they can be erased upon request.

Other: an unlimited period - in accordance with the statutory period for accounting documents?

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	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.
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.
Pseudonymisation of data:	
Encryption of data:	(in transit and idle)
Ability to ensure continued confidentiality, integrity, availability and resilience of processing systems and services:	(separation of production and test environment, separation of specific sensitive data (irrelevant), automatic back-up, advanced password procedures, specific usage rights, recording of history).
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)).
Available certification:	ISO-27001

7. Subprocessors

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

Name	Address	Purpose of use
Support	WKBE	User support when operating Basecone
Billing department	WKBE	Charge or use

8. Transmission of Personal Data

All Personal Data as included in this product file are transmitted under the following conditions:
The Personal Data are transmitted to:

- transmission to a country in the European Economic Area (= EU + Iceland + Liechtenstein + Norway).