

**GDPR PRODUCT INFO SHEET****topACCOUNT****1. Nature of processing**

Comprehensive accounting package for accountants and SMEs.

**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, date of birth, vehicle registration number, IP address, etc.)
- identity data issued by the government (national registration number, passport number, etc.)
- contact information (address, email address, IP address, IMEI, etc.)
- social status (position at work, position within the community, family situation, etc.)
- financial information (bank account numbers, loans, mortgages, investments, payment behaviour, ratings, etc.)

**3. Categories of Data Subjects**

- Controller's customers
- Controller's own employees
- suppliers, consultants, service-providers, authors, etc.

**4. Purposes of processing**

- finance
- purchasing and supplier management

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**

The Processor does not have access to personal data, except when the Controller explicitly gives instructions to carry out a support task.

**6. Security measures**

As the product is not in a location hosted by the Processor, responsibility for security lies with the Controller.

**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,
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	electronic locking of doors, reception procedures for visitors.
Access control: systems	Access to networks, operational systems, user administration and applications require 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 on the part of Wolters Kluwer is controlled by organisational measures: user administration and user accounts with specific access, personnel trained in data processing and security.
Available certification	ISO/IEC 27001 certification

#### **7. Sub-processors**

There are no Sub-processors.

#### **8. Transfer of personal data**

No transfer of personal data takes place.