

GDPR PRODUCT INFO SHEET**Vero Online****1. Nature of processing**

- Administrative software for companies, focusing on repetitive and error-prone business processes.
- Accountancy software.

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 and business name
- identity data issued by the government (national registration number, passport number, etc.)
- financial information (bank account numbers, loans, mortgages, investments, payment behaviour, ratings, etc.)

3. Categories of Data Subjects

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

4. Purposes of processing

- finance
- purchasing
- delivery of goods or services / customer 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

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

Entered Personal Data: an unlimited period

Personal Data via helpdesk support: an unlimited period

Wolters Kluwer strives for the continuous improvement of its services and will therefore bring these retention periods in line with the applicable legislation.

6. Security measures

Technical and organisational measures can be regarded as state-of-the-art at the time of conclusion of the Service Provision Agreement. The Processor will evaluate technical and organisational measures over time,

taking account of implementation costs, nature, scope, context and objectives of processing, and differences in the likelihood and the severity of risks 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 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

The following Sub-processors carry out services relating to Personal Data on behalf of Wolters Kluwer:

Name	Address	Purpose of use
ConXion BV	Hoogstraat 134 8540 Deerlijk BE0458.974.603	Implementation of the user agreement, maintenance and development of the cloud platform.
Microsoft Corporation (Azure) - Microsoft NV	Da Vincilaan 3 1930 Zaventem	Implementation of the user agreement, maintenance and development of the platform.

8. Transfer of personal data

The Personal Data as listed in this product sheet may be transferred by Microsoft to the US under the EU-US Privacy Shield Framework, with protection by means of an EU Model Contract that has been entered into. <https://privacy.microsoft.com/en-us/PrivacyStatement>