

**GDPR PRODUCT INFO SHEET**

**E-INVOICING**

**1. Nature of processing**

Electronic invoicing 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, address, mobile phone number, email address, date of birth, vehicle registration number, IP address, etc.)
- contact information (address, email address, IP address, IMEI, etc.)

**3. Categories of Data Subjects**

- Controller's customers
- Controller's own employees

**4. Purposes of processing**

- finance

**5. Retention period**

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

Entered Personal Data: As long as the customer does not ask for his data to be removed, they will remain in the system.

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.

<b>Detailed technical and organisational measures:</b>	
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 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:	No pseudonymisation
Encryption of data:	Data are encrypted.
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, 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 are provided by Azure).
Process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures to ensure processing security:	We conduct security audits on a regular and systematic basis.

## 7. Sub-processors

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

Name	Address	Purpose of use
CODABOX NV	Romeinsestraat 10 3001 Leuven	Sending of invoices to Codabox for further processing
Intellifin	Genkersteenweg 388 3500 Hasselt	Financial dashboard
Microsoft Corporation (Azure) - Microsoft NV	Da Vincilaan 3 1930 Zaventem	Implementation of the user agreement, maintenance and development of the platform.
Sendgrid	41 Corsham St London N1 6DR	Email service provider

## 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>