

TECHNICAL AND ORGANIZATIONAL MEASURES

Below, the Service Provider will positively indicate, e.g. , or otherwise state, the applicable technical and organizational security measures within each section that have been applied to the Processing of Protected Data associated with this agreement.

1. Confidentiality (Article 32 (1)(a) and (b) GDPR)

Aim: To prevent unauthorized access or disclosure of protected data to individuals, entities or Processes.

• Physical Access Control - No unauthorised access to Data Processing Facilities, e.g.:

- Use of magnetic or chip cards
- Keys
- Electronic door openers
- Facility security services and/or entrance security staff
- Alarm systems
- Video/CCTV Systems
- Other (Specify below)

• Electronic Access Control - No unauthorised use of the Data Processing and Data Storage Systems, e.g.:

- Firewall,
- Use of (secure) passwords
- Automatic blocking/locking mechanisms
- Two-factor authentication
- Encryption of data carriers/storage media
- Other (Specify below)

• Internal Access Control (permissions for user rights of access to and amendment of data) - No unauthorised Reading, Copying, Changes or Deletions of Data within the system, e.g.:

- Rights authorisation concept
- Need-based rights of access / role based access control
- Logging of system access events
- Other (Specify below)

• Isolation Control - The isolated Processing of data e.g.:

- Multiple tenant/client support
- Sandboxing
- Other (Specify below)



- Pseudonymisation - The Processing of personal data in such a method/way, that the data cannot be associated with a specific Data Subject without the assistance of additional Information, provided that this additional information is stored separately, and is subject to appropriate technical and organisational measures.

- Pseudonymisation
- Anonymization
- Scrambling
- Masking
- Blurring
- Other (Specify below)

KxArchiver add-on

2. Integrity (Article 32 (1)(b) GDPR)

Aim: To provide assurance of consistency, accuracy and trustworthiness of protected data.

- Data Transfer Control - No unauthorised Reading, Copying, Changes or Deletions of Data with electronic transfer or transport, e.g.:

- Certificate based controls, (HTTPS, FTPS etc.)
- Use of encryption
- Virtual Private Networks (VPN)
- Electronic/digital signature
- Checksums
- Other (Specify below)

- Data Entry Control - Verification, whether and by whom personal data is entered into a Data Processing System, is changed or deleted, e.g.:

- Use of Logging,
- Document Management,
- Quality control,
- Change management
- Other (Specify below)

- Data Integrity Control - Awareness or control of changes to data.: e.g.:

- File integrity monitoring
- Rights management
- Value limit
- Completeness
- Validation
- Entity
- Other (Specify below)



3. Availability and Resilience (Article 32 (1)(b) GDPR)

Aim: To ensure that information is accessible to authorized individuals, entities, or Processes when needed.

- Availability Control, e.g.:
 - ✓ Backup Strategy (online/offline; on-site/off-site)
 - Capacity plans
 - ✓ Uninterruptible Power Supply (UPS)
 - ✓ Virus protection
 - ✓ Reporting procedures
 - ✓ Contingency planning
 - Other (Specify below)

- Ability for timely recovery (Article 32 (1)(c) GDPR); e.g.:
 - ✓ Use of backup strategy – recovery time objectives, recovery point objectives
 - ✓ Disaster recovery plans
 - Other (Specify below)

- Architectural Control; To reduce the possibility of loss of service through architectural/structural design e.g.:
 - ✓ High availability designs
 - ✓ Load balancing
 - Redundancy
 - ✓ Failover
 - Raid configurations
 - ✓ Software update/upgrade Processes
 - ✓ Patch management
 - Other (Specify below)

4. Effectiveness - Procedures for regular testing, assessment and evaluation (Article 32 (1)(d) GDPR)

- Data Protection Management, e.g.:
 - Use of data register
 - Data inventory
 - ✓ User awareness training
 - Other (Specify below)

- Data Privacy Impact Assessments, e.g.:
 - ✓ Continued use of Privacy Impact Assessments
 - ✓ General risk assessments
 - Other (Specify below)



- Incident Response Management; e.g.:
 - ✓ Use of the corporate Incident handling procedure
 - Use of industry standard security incident handling procedures
 - Other (Specify below)

- Data Protection by Design and Default (Article 25 Paragraph 2 GDPR); e.g.:
 - Pseudonymisation
 - Data minimization
 - Data segregation
 - Role base access controls
 - Encryption at rest
 - Other (Specify below)

- Order or Contract Control - No third party data Processing as per Article 28 GDPR without corresponding instructions from the Client, e.g.:
 - ✓ Clear and unambiguous contractual arrangements
 - Formalised Order Management
 - ✓ Due diligence in selection of the Sub-Processor,
 - Duty of pre-evaluation
 - Duty of protection assurance
 - Supervisory follow-up checks
 - Other (Specify below)

