

PERSONAL DATA PROCESSING NOTICE ON BASWARE SERVICES

The **Basware Group** consists of Basware Corporation (parent company, headquartered in Finland) and several subsidiary companies worldwide, owned by Basware Corporation. Each of our group companies is established, employs people and operates in accordance with the applicable legal requirements.

Whilst using our services, our customers transmit business documents to our systems. Business documents might contain **personal data**, basically business contact data. Our customers are responsible for the protection of these personal data. This Notice describes the data processing measures we take to assist our customers to comply with data protection laws which apply to them.

Companies buy and sell goods and services. Companies receive, send, book and archive the related orders and invoices. Companies validate and pay incoming invoices, possibly relying on financing solutions.

We at Basware offer standard **automation services for procurement and account payable and receivable processes** to our customers, such as Basware Purchase to Pay and e-Invoicing services. We also offer a variety of **financing services**.

Whilst using our services, our customers transmit orders, invoices and other business documents to our systems for further processing. These business documents might contain **personal data**, basically business contact data of individual contact persons, such as name, function, phone number and email address.

We recognize that our customers, in many countries, are responsible for the protection of these personal data mentioned on business documents, in accordance with **data protection laws**. Many of our customers' processing of personal data will particularly be subject to the European Union (EU) General Data Protection Regulation (**GDPR**). The GDPR will require our customers to select service providers who guarantee their ability to implement appropriate measures so that the processing meets the GDPR requirements.

The present Notice precisely aims to reassure our customers that the standardized way we design our services, and the measures we foresee, will assist them to comply with the applicable GDPR requirements and other data protection laws, when personal data, as part of business documents, are processed on our systems.

To further reassure our customers, we are making contractual commitments available that provide data protection assurances about our services and to assist our EU customers in particular in preparing for the date on which the GDPR becomes enforceable. These commitments are described in our **GDPR-ready Basware Personal Data Processing Appendix**.. It assists our customers in demonstrating their compliance with the GDPR. Customers who want to obtain a copy of it, should contact their Basware account manager to add it to the standard sales agreement they conclude with us, unless it's already added by default.

Below is a summary of the measures we take.

Concepts. In legal terms, we are data processors for the personal data mentioned on business documents we process on behalf of our customers, the data controllers.

Instructions. We process personal data only on behalf of our customers, if contained in business documents transmitted to Basware, to the extent necessary for us to perform our services and in accordance with our customers' commercially reasonable instructions, as set out in the standard sales agreement they conclude with us. Before expiry of our services, our customers may export their business documents from the services. After expiry of the services, we shall permanently delete these business documents from our systems, unless if otherwise required by applicable law. We trust that our customers inform the individuals regarding the processing of their personal data through our services, and obtain their consent if necessary. Where we use our customers' business documents to develop, analyze and market our services, we anonymize such data where necessary to comply with our confidentiality undertakings and do not touch upon any personal data.

Awareness. Our staff members processing personal data are bound to confidentiality and trained to comply with our data processing and security policies.

Subcontractors. Our services are cloud-based multi-tenanted standard services. This means that our services are based on software applications running on a cloud infrastructure, designed to serve all of our customers in many countries. We are therefore best placed to select and involve properly qualified subcontractors to support us in managing our cloud infrastructure and in delivering our services to all of our customers. We are responsible for our subcontractors and we have appropriate confidentiality and data processing arrangements in place with them. Such arrangements reflect data processing obligations similar to the ones we agree upon with our customers. Upon request, we inform our customers of our related subcontractors that process personal data. In case we change any such subcontractor, we notify the concerned customers of such change. We will listen to any of these customers who demonstrates, further to our notification, that the new subcontractor has breached any applicable data protection law, and will subsequently undertake all commercially reasonable efforts to remedy this situation.

International Transfer. We may have personal data, as part of business documents, processed by our subcontractors outside customers' country of domicile for the purpose of supporting us, as specified above. In case the processing is subject to EU data protection laws and our customers' personal data are transferred to our subcontractor for processing in any country outside the European Economic Area that does not ensure an adequate level of data protection, Basware provides for appropriate safeguards by EU Commission approved standard contractual clauses or by any other appropriate safeguard as foreseen under the GDPR.

Security. We maintain appropriate technical and organizational security measures designed to protect the security and integrity of personal data. Our security measures are described in a separate notice, which is available upon request. From time to time, we audit, evaluate and may adapt our security measures, without decreasing the overall security.

Security Incidents. We commit to notifying our related customers in the unlikely event of any unauthorized access to personal data on our systems, of which we become aware. Our notification

shall contain the legally required information. We will then use commercially reasonable efforts to identify and remediate the cause of such security incident, to the extent the incident results from our default.

Access. Customers who need to rectify, block or erase personal data mentioned on specified business documents which are on our systems, can carry this out through our services. Where this would not be possible, we will assist our customers.

Assistance. We will further assist our customers in ensuring compliance with their obligations to perform security and data protection assessments, security incident notifications and prior consultations of competent supervisory authorities, at a reasonable additional cost and taking into account the nature of the processing and the information available to us.

Records of Processing. At the latest as of when the GDPR becomes enforceable, we will maintain a record of all categories of personal data processing carried out on behalf of our customers.

Documentation and Audit. At the latest when the GDPR becomes enforceable, we will have documented our steps taken to ensure compliance with our obligations under applicable data protection laws and data processing agreements with our customers. Copies of such documentation are available for inspection by our customers on request. To the extent further required and subject to some practical arrangements, customers may audit our compliance as referred to above.

Governance. Our Data Protection Team consists of data protection and security experts and is responsible for the implementation of our data protection program, as well as identifying and documenting our related data processing activities and performing security and data protection impact assessments. We are also defining and following up on the execution of compliance improvement actions and pursuing relevant security certifications and accreditations.

Contact. Any question about this Notice or our data processing practices can be sent to the Basware Legal Team at privacy@basware.com or at the address mentioned in the footer of this Notice.

We trust that our data processing measures as set out above bring sufficient comfort to our customers on the appropriate processing through our services of personal data mentioned on their business documents. We recommend our customers to share this information with their relevant collaborators.

Kind regards

Basware

As this Notice is only given for information purposes and not as legal advice, we can modify it at any time without notice and we recommend that you verify with your legal advisers or competent authorities the compliance of your (intended) decisions and actions with your own legal obligations.