

## Basware GDPR Program White Paper

The General Data Protection Regulation (“GDPR”) is a new EU regulation to be applied in all EU Member States as from 25 May 2018 to protect individuals with regard to the processing of their personal data. The GDPR applies to the Basware Group (“Basware”), as well as to many of its customers, partners and suppliers.

Basware conducted an extensive GDPR compliance program. Basware has obtained external legal assistance in order to audit and verify the GDPR compliance program and the results thereof.

As GDPR compliance is an on-going responsibility, the purpose of this White Paper is to specify Basware’s identified GDPR actions. It describes the actions already carried out and the on-going measures in order to ensure Basware’s compliance with the GDPR.

The measures Basware has taken as part of the GDPR compliance program mainly include the following:

<b>accomplished measures</b>
appointment of data protection compliance team members
benchmarking for industry best practices
due diligence on existing process registers and data flows and review of system infrastructure relating to storing and processing of personal data
review and assessment of personal data collection and processing practices within the scope of different Basware services and operations (Network & P2P services, HR, Marketing, etc.)
assessing and validating security measures of systems that include personal data (cf. SOC certificates)
preparing personal data processing agreement templates complying with GDPR requirements
publishing standard personal data processing appendix (including data transfer and security annexes) on Basware’s general terms webpage to be part of new sales agreements
publishing personal data processing notice and GDPR white paper on Basware’s business data and GDPR webpages
updating on-line privacy notice
training of relevant key personnel
training of all employees on personal data protection basics
creating register of most important personal data processes
general accountability documentation

The measures Basware is performing on an on-going basis, mainly include the following:

<b>on-going measures</b>
further completing register of personal data processes
data protection impact assessment relating to processing of personal data within the scope of new or adapted Basware services and operations
improving documentation of Basware security measures (cf. SOC certificates)
building further accountability documentation
building further internal data protection policies
training of all relevant employees on internal policies
ensure GDPR compliant data processing agreements and audits with subcontractors



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Any questions about this GDPR Program White Paper or our data protection practices can be sent to the Basware Legal Team at [privacy@basware.com](mailto:privacy@basware.com).

The White Paper shall be for informational purposes only and shall not create or constitute any legal or other obligations for Basware. It shall be updated in accordance with the progress of Basware's GDPR compliance program and the information contained herein shall therefore only apply for a limited period of time.

We trust that this White Paper sufficiently informs our customers on how Basware plans to comply with the applicable GDPR requirements.

Kind regards

Basware

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