

# Desk-Net GDPR Documentation – Processor - Record of Processing Activities (Art. 30 (2) GDPR)

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## Processor in the sense of Art. 30 (2):

Desk-Net GmbH

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## Controller's Data Protection Officer:

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## Data Protection Measures

See document „Technical and Organisational Measures (TOMs)“.

## Data Deletion Procedures

See document „Data Deletion Policy“.

## Data Transfer to Third Countries

None

## Data Processing Activities

See annexes 1 – 6 to this document.

## Annex 1 – Processing Activity: Provision of the Desk-Net application

### Responsible:

CEO Matthias Kretschmer and sub-contractor Intetics GmbH Sp. z o.o

### Processing purpose

General provision of the Desk-Net application so that users can enter, edit and delete data. This includes the storage of such data.

### Legal basis of processing:

Desk-Net Agreement

### Categories of data subjects

- Employees
- Suppliers (freelancers)

### Categories of personal data

- Personal Master Data (Key Personal Data)
- Contact Data (Telephone, Email)
- Planning and Control Data
- Other: Shift assignments, absences

### Recipients of the data

- Technical operations and maintenance team  
Intetics GmbH Sp. z o.o.; Poland
- Hosting provider – exclusively on EU servers  
Amazon Web Services EMEA SARL (AWS Europe); Luxembourg

### Data transfer to third countries

None

## Annex 2 – Processing Activity: User profile creation, manipulation, removal in support cases

### Responsible:

Customer Success Management team and Technical Support team

### Processing purpose

Customer Success Management team creates, edits and removes user profiles in rare cases based on written requests from administrators on the customer side. In even fewer cases does the Customer Success Management team require technical support from its technical team in these cases.

### Legal basis of processing:

Desk-Net Agreement

### Categories of data subjects

- Employees
- Suppliers (freelancers)

### Categories of personal data

- Personal Master Data (Key Personal Data)
- Contact Data (Telephone, Email)
- Planning and Control Data
- Other: Shift assignments, absences

### Recipients of the data

- Customer Success Management team  
Desk-Net GmbH; Germany
- Technical Support team  
Intetics GmbH Sp. z o.o.; Poland

### Data transfer to third countries

None

## Annex 3 – Processing Activity: User profile list deletion

### Responsible:

Customer Success Management team and Technical Support team (Krakow, Poland)

### Processing purpose

Deletion of the entire user data in case of a contract cancellation.

### Legal basis of processing:

Desk-Net Agreement

### Categories of data subjects

- Employees
- Suppliers (freelancers)

### Categories of personal data

- Personal Master Data (Key Personal Data)
- Contact Data (Telephone, Email)
- Planning and Control Data
- Other: Shift assignments, absences

### Recipients of the data

- Customer Success Management team  
Desk-Net GmbH; Germany
- Technical Support team  
Intetics GmbH Sp. z o.o.; Poland

### Data transfer to third countries

None

## Annex 4 – Processing Activity: User data review in support cases

### Responsible:

Customer Success Management team and Technical Support team

### Processing purpose

Customer Success Management team may need to review user data such as assignments in support cases. In rare cases does the Customer Success Management team require technical support from the Technical Support team.

### Legal basis of processing:

Desk-Net Agreement

### Categories of data subjects

- Employees
- Suppliers (freelancers)

### Categories of personal data

- Personal Master Data (Key Personal Data)
- Contact Data (Telephone, Email)
- Planning and Control Data
- Other: Shift assignments, absences

### Recipients of the data

- Customer Success Management team  
Desk-Net GmbH; Germany
- Technical Support team  
Intetics GmbH Sp. z o.o.; Poland

### Data transfer to third countries

None

## Annex 5 – Processing Activity: User information

Responsible:

Customer Success Management team

Processing purpose

Information to users about upcoming changes to the software and related system downtime.

Legal basis of processing:

Desk-Net Agreement

Categories of data subjects

- Employees
- Suppliers (freelancers)

Categories of personal data

- Personal Master Data (Key Personal Data)
- Contact Data (Telephone, Email)
- Planning and Control Data
- Other: Shift assignments, absences

Recipients of the data

- Customer Success Management team  
Desk-Net GmbH; Germany

Data transfer to third countries

None

## Annex 6 – Processing Activity: Database Anonymization

### Responsible:

CEO Matthias Kretschmer and Customer Success Management team

### Processing purpose

Anonymization of personal data so database copies may be used for software development and testing purposes in a GDPR-compliant way.

### Legal basis of processing:

Desk-Net Agreement

### Categories of data subjects

- Employees
- Suppliers (freelancers)

### Categories of personal data

- Personal Master Data (Key Personal Data)
- Contact Data (Telephone, Email)
- Planning and Control Data
- Other: Shift assignments, absences

### Recipients of the data

- CEO Matthias Kretschmer and Customer Success Management team  
Desk-Net GmbH; Germany

### Data transfer to third countries

None