

Desk-Net GDPR Documentation – Controller - Record of Processing Activities (Art. 30 (1) GDPR)

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Controller in the sense of Art. 30 (1):

Desk-Net GmbH

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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

See document „Data Processing Agreement“.

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

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 team
- Hosting provider

Data transfer to third countries

Belarus (Intetics GmbH; until end of 2018)

Technical support of the Desk-Net Support team.

Based on EU Standard Contractual Clauses (Art. 46 (2) GDPR).

Amazon Web Services EMEA SARL

Hosting of the Desk-Net application, exclusively on servers inside the EU.

EU Standard Contractual Clauses (Art. 46 (2) GDPR) apply to any data that could be transferred via onward transfer outside the EEA.

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

Responsible:

Customer Success Management team and Technical Support team

Processing purpose

The Desk-Net Support 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 Desk-Net Support 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 and Technical Support team

Data transfer to third countries

Belarus (Intetics GmbH; until end of 2018)

Technical support of the Desk-Net Support team.

Based on EU Standard Contractual Clauses (Art. 46 (2) GDPR).

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 and Technical Support team (Krakow, 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 and Technical Support team

Data transfer to third countries

Belarus (Intetics GmbH; until end of 2018)

Technical support of the Desk-Net Support team.

Based on EU Standard Contractual Clauses (Art. 46 (2) GDPR).

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

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

Data transfer to third countries

None