

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

December 12th, 2020

## Processor:

Desk-Net GmbH

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## Data Protection Measures

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

## Data Deletion Procedures

See document „Data Deletion Procedures“.

## 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

None

## 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

The Desk-Net Support may need to review user data such as assignments in support cases. In some cases does the Desk-Net Support require technical support from its technical 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 of 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 that copies of the database can 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