

Data Processing Description: Finago Apex

This appendix describes the processing of Personal Data in accordance with applicable data protection legislation.

PERSONAL DATA PROCESSOR

Apix Messaging Oy, Keilaniementie 1, 02150 Espoo, Finland. 2332748-7

In Sweden, the Service Provider is Finago AB, Sveavägen 9, 111 57 Stockholm, Sweden. 556942-4467. In this case, Apix Messaging Oy is a subprocessor.

You can find the Service Provider's contact information for privacy on our website.

PROCESSING ACTIVITY

Delivery of and maintenance for Software Service and related supporting measures. Customer uses the Service as a Controller for sending and/or receiving of electronic business messages.

PURPOSE OF PROCESSING

To deliver the Software Service as per Agreement and to fulfill the Service Provider's other obligations under Agreement.

DURATION OF PROCESSING

Service Provider processes Customer's Personal Data according to terms and conditions for the duration of the Agreement. The Supplier retains Customer materials transmitted through the Service from the time of transmission as follows:

- Invoice data for a minimum of three (3) months
- Payslips for a minimum of eighteen (18) months
- Invoice processing data for a minimum of six (6) months

The Customer acknowledges that they are independently responsible for complying with accounting obligations and for retaining and archiving their own materials in accordance with legal obligations.

The Supplier reserves the right to delete the Customer's materials once the Contract has terminated by either party, or in cases where the Customer has not used the Service for the past eighteen (18) months (e.g. no messages have been sent or received during that period).

CATEGORIES OF DATA SUBJECTS

As the Controller, Customer decides whose Personal data it processes in the Service. Typically, the data of business partners, customers, employees, and other stakeholders is processed in the Software Service.

CATEGORIES OF PERSONAL DATA

As the Controller, Customer decides which Personal Data it processes in the Software Service.

DATA PROCESSING DESCRIPTION

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The following Customer materials typically include personal data: business partner registers, sales and purchase invoices, sales and purchase orders, messages related to the supply chain, payslips, printing service transactions, scanning service transactions, electronic invoices, and electronic payslips.

Typically, the following types of data are processed in the Software Service:

- Basic information, such as name, contact details, identification data (e.g. social security number)
- Bank account number
- Payroll and tax information in payslips
- Company (sole trader) related information (e.g. business ID, VAT registration number)
- E-invoicing address details (sole trader)
- Personal data contained in invoices
- Data contained in other transmitted messages
- In needed extent, IT information related to offering the Service such as user account, access rights, metadata, and technical data related to Service usage
- Other data stored by the Controller.

In principle, the Software Service is not intended for processing sensitive Personal Data.

The data may be in such a format that it cannot be directly and electronically identified as personal data. Such personal data may be found within the content of processed messages (e.g. invoice, invoice image, or invoice attachments) and they may include sensitive personal data, depending on what the sender of the message has included.

INFORMATION SECURITY MEASURES

For their part, Service Provider has taken in use appropriate technical and organizational measures to protect the confidentiality, integrity, and availability of Customer's Personal Data. To protect Personal Data, Service Provider implements, for example, the following measures:

- Practices and work instructions for the Software Service have been approved and taken in use.
- Data resources are managed and listed.
- Access rights for Service Provider's employees are restricted to the extent required by their job duties, and they are updated in connection with changes or removed when the employment ends.
- Changes to Service Provider's information systems and offered services are controlled, and appropriate fallback procedures are verified.
- Service Provider's information systems and offered services have secure basic configurations, which ensure data protection and information security by default.
- Vulnerabilities are monitored and actions taken when needed. Issues are controlled, reported, and responded to appropriately.
- Backups are monitored to ensure coverage, and recovery plan is prepared.
- All Service Provider's control measures are monitored, and their operation is verified. As necessary, control measures and related practices are regularly improved.

GEOGRAPHICAL AREA

The location of Personal Data is in the EU/EEA. In principle, personal data is not transferred outside the EU/EEA.

International data transfer can only come into question if our subprocessors need to access the data, for example, to perform maintenance and support tasks, or if mandatory legislation outside the EU regarding subprocessors requires it. Any international transfer of data will be based on an adequacy decision by the EU Commission or, alternatively, standard contractual clauses and appropriate safeguards will be implemented.

finago

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APPROVED SUBPROCESSORS

In Sweden, the Service Provider is Finago AB, Sveavägen 9, 111 57 Stockholm, Sweden. 556942-4467. In this case, Apix Messaging Oy is a subprocessor.

The following subprocessors are used in the processing of Customer's Personal Data:

Service	Company	Role in the Service	Data location
Software Service	Amazon Web Services EMEA SARL	Cloud services, data storage and scalable virtual environments	EU (Ireland, Sweden)
Software Service	Microsoft Ireland Operations Ltd	Cloud services, data storage and scalable virtual environments	EU (Ireland)
Software Service	Telia Cygate Oy	Cloud services, data communication connections and data center services	EU (Finland)
Software Service	Posti Messaging Oy	Printing, mailing and scanning services (FI)	EU (Finland)
Software Service	Postnord Strålfors Oy	Printing services (FI)	EU (Finland)
Software Service	21 Grams AB	Printing and mailing services (FI, SE, NO, DK)	EU (Sweden)
Software Service	Iron Mountain Sweden AB	Scanning services (SE, DK, NO)	EU (Sweden)
Software Service	Fitek AS (former Unifiedpost AS)	Connectivity to the national e-invoicing infrastructure (EE, LT, LV, PL)	EU (Estonia)
Software Service	Omniva OÜ (Eesti Post)	Message transmission (EE)	EU (Estonia)
Software Service	mySupply APS	Connectivity to the national e-invoicing infrastructure (DK)	EU (Denmark)
Additional Service	Qvalia AB	Peppol procurement messaging services	EU (Sweden)

Part of the subprocessors process data only if the Customer uses the services in question or when operating in specific countries. Additionally, other subprocessors which are separately defined in the agreement between Customer and Service Provider may be used for personal data processing.

And up-to-date listing of subprocessors is available at <https://apixmessaging.com/subcontractors/>.