Data Pro Statement

Date: 2023-09

Public

Visma Idella is certified for the Data Pro Code. The Data Pro Code is a code of conduct approved by the Dutch privacy regulator, the Dutch Data Protection Authority. According to the Data Pro Code, a processor informs its customer about the security measures it has taken with regard to its service or product in such a way that a customer is able to make an assessment itself whether these measures are sufficient, given the intended use of the data by the customer. The aforementioned in respect to the intended use of the service or product and thus possible processing of personal data. To do this in an unambiguous way for all Data Pro certified organizations, the Data Pro Code contains the Data Pro Statement. Below you will first read more about the Data Pro Code and also the Data Pro Statement of Visma Idella.

Data Pro Code
The Data Pro Code is an approved code of conduct as referred to in Article 40 of the General Data Protection Regulation (GDPR) in the Netherlands. This code of conduct was established at the initiative of the IT sector organization NLdigital with the aim of guaranteeing GDPR compliance (particularly with the requirements of Article 28 of the GDPR) of IT organizations that process personal data as processors for their customers in the Netherlands. All organizations that have obtained the Data Pro certificate are registered in the Data Pro Register (Data Pro Number 717532620 .

Data Pro Statement (NLdigital version July 2022)

This Data Pro Statement is part of the standard processing agreement of Visma Idella BV in its capacity as " *Data processor* " / ' *(data) Processor* ').

General information

1. This Data Pro Statement has been drawn up by Visma Idella BV, with its registered office and principal place of business at Amersfoort at Plotterweg 24 (postal code: 3821 BB)

    For questions about this Data Pro Statement or data protection, please contact:
    mr. CR Angel (Corinna), corporate lawyer / Data Protection Manager
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    FG-number: FG013912

2. This Data Pro Statement is applicable as of 22 June 2022. Visma Idella reserves the right to adjust the security measures described in this statement to ensure the measures remain up-to-date and in full compliance with law and regulations. Updated versions will be distributed through our normal channels.

3. This Data Pro Statement applies to the following Visma Idella products and services:

    VIPS Suite, consisting of:
    - ❖ VIPS Pensions
    - ❖ VIPS Disbursements
    - ❖ VIPS Retail Investments
    - ❖ VIPS Benefits (Appa / ZW ERD / BWW)
    - ❖ VIPS Unit Administrations

> ❖ VIPS Futurama
> ❖ eBenefits

and

BPO (Business **Process Outsourcing** (administration)), consists of

> ❖ BPO Pension and rights administration (*BPO Pensioen & Rechtenadministratie*)
> ❖ BPO Investment administration (*BPO Beleggingsadministratie*)
> ❖ BPO Payment administration (*BPO Excasso*)
> ❖ (S)PAWW

With the BPO, Visma Idella offers pension funds and administrators a scalable and efficient solution for operational transaction processing in addition to the SaaS service.

4. The **V**isma **I**della **P**roduct **S**uite (**VIPS**) is a **S**oftware **a**s **a S**ervice (**SaaS**) application, developed for the pension sector, financial institutions and insurance companies, for the implementation of related financial administrations.

VIPS Pensions + BPO Pension and Rights Administration (BPO Pensioen & Rechtenadministratie):
This SaaS solution enables pension funds, administrators and Insurance companies to conduct efficient pension administration, embedded in an extensive control framework.

The service can use portals (*eBenefits*). eBenefits is an online platform for pension communication and data exchange that pension funds and insurers use to contact employers and participants. Visma Idella connects the software to current applications. Thus, pension providers benefit from an integrated solution for pension administration and communication with employers and participants

The BPO offers all the benefits of our SaaS service, supplemented with mutation and transaction processing on an instruction only basis, such as executing divorces and value transfers.

VIPS Disbursement + BPO Payment Administration (BPO Excasso):
VIPS Disbursements is a disbursement solution, allowing the customer to correctly, timely and completely execute one of their primary processes: disbursement. The solution is based on best practices and is built to easily integrate into the customer's ecosystem. Part of the solution entailed the implementation of an employer portal, which is built to provide information to the employer and other stakeholders.

The service can use portals (*eBenefits*). eBenefits is an online platform for pension communication and data exchange that pension funds and insurers use to contact employers and participants. Visma Idella connects the software to current applications. Thus, pension providers benefit from an integrated solution for pension administration and communication with employers and participants

The BPO offers all the benefits of our SaaS service, supplemented with operational mutation and transaction processing.

VIPS Retail Investments + BPO Investment Administration (BPO Beleggingsadministratie) :
This SaaS solution enables pension funds, administrators, asset managers and banks to conduct efficient administration, embedded in an extensive control framework. This service combines rich functionality with workflows to make customer processes faster and more efficient. User-friendly

portals provide access to the administration for investors and the back office. With the help of Business Intelligence, the customer can then report and analyze data without any problems.

With its BPO, Visma Idella offers banks, investment institutions, pension funds and administrators a scalable and efficient solution for operational transaction processing. From onboarding, executing switches and profile changes to supporting the implementation of the duty of care.

VIPS Unit Administration

This SaaS solution enables pension funds, administrators and Insurance companies to conduct efficient unit administration, embedded in an extensive control framework. Ease of use, more efficient implementation and where applicable clear portals result in high customer satisfaction.

VIPS Futurama

Futurama is a user-friendly low-code platform to model calculations and applications yourself. Without the involvement of system developers. Futurama consists of various building blocks with which tools can be created that:

1. Retrieving data and information from databases;
2. Perform complex calculations;
3. Present the results of these calculations to your customers.

eBenefits

eBenefits is an online platform for pension communication and data exchange that pension funds and insurers use to contact employers and participants.

eBenefits connects to Visma Idella systems but is also available as a separate pension communications platform.

VIPS Benefits + SPAWW

In addition to the aforementioned services, Visma Idella also provides services in the field of:

a   fulfilling all legal obligations regarding the General Pension Act for Political Office Holders (APPA). For further information about this service, reference is made to the Visma Idella Infosheet APPA which can be downloaded from our [website](#).

b   carrying out the administration of supplementary and subsequent benefits in the event of unemployment and incapacity for work. For further information about this service, reference is made to the Visma Idella Infosheet Extra-legal WW, which can be downloaded from our [website](#).

c   carrying out the administration with regard to the Sickness Benefits Act ('ZW ERD'). For further information about this service, reference is made to the Visma Idella Infosheet Sickness Benefits Act, which can be downloaded from our [website](#).

d   taking care of the RVU administration. For further information about this service, reference is made to our [website](#).

e   of the Private Supplement for WW and WGA (PAWW). This means that Visma Idella develops, among others, the following activities:

4. Registration and verification of participating employers
5. Declaration and payment of the contribution
6. Communication with employers and participants
7. Assessing benefit applications
8. Provision of the benefit to the participants

5.   The services mentioned under '4' are designed and arranged to process the following types of data:

a   Name and address details such as name, telephone, address, e-mail;
b   Identification data such as login name, password and IP address;
c   Health information such as sick leave and benefits data;
d   Financial information such as salary, benefit or IBAN;
e   Citizen Service Number (BSN).

For a product/service-specific description of the data to be processed, a reference is made to the applicable processing agreement as part of the agreement.

6.   When designing our products/services, the processing of special personal data or personal numbers issued by the government, such as health information (sickness benefit) and the citizen service number (BSN) is taken into account.

Processing the hereinabove referred data with the product or service described above by the customer is at the customer's own discretion.

7.   Visma Idella has applied *privacy by design in* the design of the product/service in the following way:
a   During the entire software development process, Visma Idella takes privacy and protection of personal data into account. As part of the Visma group we also follow the guidelines detailed in the Data Protection Program and work actively with Governance, Risk and Compliance (GRC), ensuring that Information Security is at a balanced level.

To assure privacy by design is applied throughout our organization this subject has been made one of the key objectives of the VASP: a custom-made application security program based on leading industry standards and best practices and embedded directly into our production systems. It is a tiered and scalable programme, where the requirements that a product has to comply with are tailored to the product in question; its technology, delivery model, market and other factors.

Measures
- A proactive approach to protect privacy and personal data, in a preventive way.
- (Personally identifiable) Data in a system or service is classified to determine whether additional action is required.
- Privacy controls are built directly into the system, process, or business practice. Privacy is embedded in the design.
- Personal data is encrypted as Data at Rest and/or Data in Transit, across all layers of the software architecture and throughout the information lifecycle.
- Visma Idella has implemented - unless otherwise agreed/coordinated with the customer - the most privacy-friendly settings by default in accordance with the instructions of its customer.

b   VIPS has been designed in such a way that only data that is necessary for the proper execution of the relevant service can be entered into the various standard applications. In addition, the respective customer determines, where appropriate, which data must be entered or which fields are made available and it is the customer himself who uploads and enters, deletes and changes data. Visma Idella cannot view the data independently except when permission is granted, for example, if the service desk receives a request for help.

c   VIPS uses a DTAP (Development Testing Acceptance Production) approach. Therefore in all the environments (except Prod) no real data is being processed by Visma Idella.

8. Visma Idella does not use the standard processing clauses as drawn up by NLdigital but instead uses its own standard processing agreement (NEW.VIS.2x.001.0x - Appendix xx - Processing agreement (general)).

9. Visma Idella processes customer-controlled personal customer data only within the EU/EEA.

10. Visma Idella uses Cloud Outsourcing as detailed below.
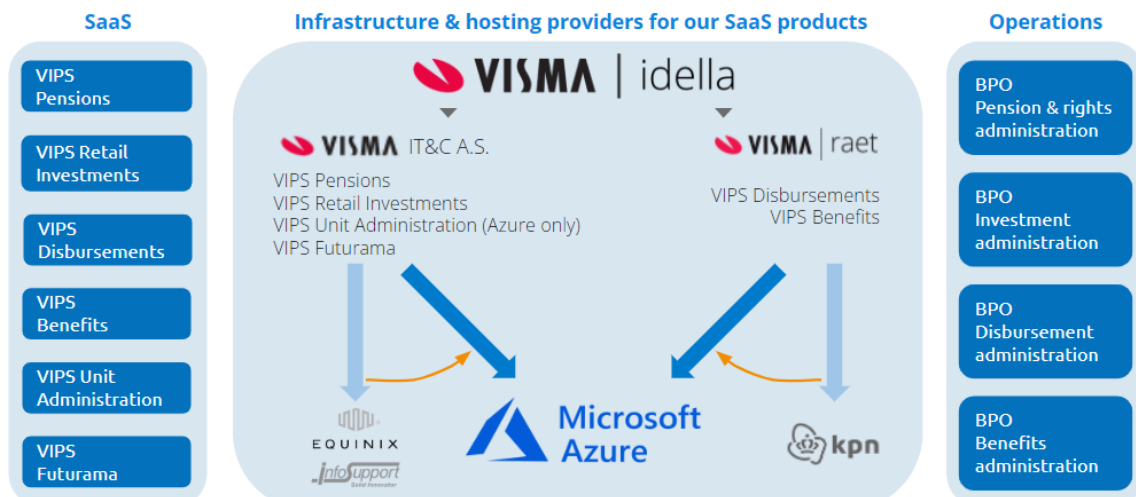
source: Visma In control, version 5 - April 2022. As of 01.01.2023 eBenefits is included as SaaS solution.

11. Visma Idella uses standard sub-processors, which can be found on Visma Idella's Trust Center. Specific deviations are included separately in the customer-specific appendix to the standard processing agreement.

    In addition, Visma Idella will make a ' *Notification form Outsourcing DNB* ' available on request, in which the general chain of processing is specified in more detail.

    Visma Idella periodically assesses suppliers and informs you as a result of changes to the list with due observance of the provisions of the processing agreement

12. After termination of the agreement with a customer, Visma Idella deletes the personal data that Visma Idella processes for the customer in accordance with the exit plan, unless other mandatory periods have to be taken into consideration. In the absence of an exit plan and/or other contractual agreements, personal data will be deleted in accordance with the applicable 'data deletion policy' at the latest within 6 months after the end of the service. Deletion of personal data will take place in such a way that they can no longer be used and are no longer accessible (rendered inaccessible).

13. After termination of the agreement with the customer, Visma Idella will return all personal data that it processes for the customer as further agreed between the parties in the exit agreement/exit plan/agreement applicable to the parties.

14. If the customer receives a request from the data subject(s) for which the assistance of Visma Idella is desired, as referred to in the processing agreement, the customer can send an email to the contact person designated in the processing agreement.

Security Policy

15. Visma Idella has taken security measures to protect its product or service and handles your data with the greatest possible care. We only process your data in accordance with the requirements of the applicable privacy legislation. This means that:
    - ❖ We secure your personal data at an adequate and appropriate level;
    - ❖ We do not share your personal data with third parties in any way unless:
        - ➢ We obtained prior approval from you as further detailed in the data processing agreement and have established a processing agreement with the third party with whom we work, or
        - ➢ We are legally obliged to provide your data, for example for investigations by government authorities such as the judiciary or regulators.
    - ❖ We do not store your personal data longer than necessary to achieve the purposes for which your data was provided or collected;
    - ❖ We never make your personal data available to third parties for commercial purposes or resell;
    - ❖ We do not transfer customer-controlled personal customer data to countries outside the European Economic Area.

    In addition, the following general measures apply:
    - ❖ Access to VIPS takes place via a secure (SSL) connection with standard two-level authentication or customer certification + password.
    - ❖ Access rights are regulated at user level. The Visma Idella password policy is always applicable unless otherwise agreed.
    - ❖ There is a strict (with, as a minimum, logical) separation of data per customer.
    - ❖ A Backup Protocol is applicable which details that:
        - ➢ daily backups are to be stored in secure storage in a different data center than where the data is located.
        - ➢ backups are kept for a minimum of 28 days. A different term may have been agreed upon per system.

16. Visma Idella has set up an Information Security Management System (ISMS) in accordance with ISO27001 and also conforms to the following guidelines/programs :
    - a   OWASP
    - b   NCSC Web Guidelines
    - c   Other, namely: Visma Application Security Program

17. Visma Idella has the following certifications:
    - ❖ Data Pro Code
    - ❖ ISO27001

If you would like to view a copy of the aforementioned certificates, please request this from your regular contact person at Visma Idella or via IDE.legal@visma.com. More information about 'Assurance' can be found on our website.

Data breaches

18. Visma Idella has a procedure in place on how to handle privacy incidents which can be downloaded here. This process and its specialized team that addresses privacy incidents are a vital part of the Visma Application Security Program.

19. If Visma Idella discovers a potential data breach, Visma Idella will - with due respect to the Incident handling procedure - inform you as our customer without undue delay, in accordance with the obligations detailed in the processing agreement.

Visma Idella provides as much relevant information as possible with every report, including in any case: description of the incident, date and time at which the incident took place, the cause, estimate of the number of persons involved, to whom / which party the leak was made, which measures have been and/or are being taken and which categories of personal data have been leaked.

Visma Idella itself does not report to the Data Protection Authority or the data subject(s). Whether or not to report remains the responsibility of the customer as the controller (Article 33 GDPR). If requested, Visma Idella will support the customer in the reporting process.

Finally, all our products are subject to a security and compliance regime that monitors, measures and identifies risks. Monitoring is automatic, 24/7 via an index developed by Visma where anyone within Visma can view the status of our products at any time from a privacy/security perspective. When a risk is identified, a risk owner is responsible for outlining the risk and monitoring mitigation.

For more information, please read our Data Protection Program as published on our website.

Visma Idella B.V.

L.P. Frens
Managing Director

Colophon

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Version history

Version	Date	Author(s)	Remarks
1.0	2022-06	DPM	First official Statement; part of Data Pro Audit
1.1	2022-07	DPM	Retention period after termination changed from 12 to 6 months + change of layout + adding certificatenumber
2.1	2023-07	DPM	Updating Links
2.2	2023-09	DPM	Updating namingconvention