Specifications for data processing

1 Purpose of Processing

Personal data belonging to the Controller shall be processed by the Processor within the meaning of Art. 4 No. 2 of the GDPR, in particular collected, stored, modified, read, queried, used, disclosed, compared, linked or deleted as required, in order to fulfill the Processor's obligations under the Main Contract. The purpose of the processing thus depends on the data processing described in the Main Contract.

2 Categories of Personal Data

The categories of personal data affected by the processing depend on how the Controller uses the Processor's services. Categories of data that may be processed include:

- Master data (e.g. names, addresses, dates of birth)
- Contact details (e.g. e-mail addresses, telephone numbers, messenger services)
- Content data (e.g. text entries, photographs, videos, contents of documents/files)
- Contract data (e.g. subject of the agreement, terms, customer category)
- Payment data (e.g. bank details, payment history, use of other payment service providers)
- Usage data (e.g. usage history on our web services, information about specific content used, times of access)
- Connection data (e.g. device information, IP addresses, URL referrer)
- Location data (e.g. GPS data, IP geolocation, access points)

The Controller is responsible for conducting a risk assessment as to whether the provider's services are suitable for processing special categories of personal data pursuant to Art. 9 Para. 1 of the GDPR.

3 Categories of Data Subjects

The categories of data subject affected by the processing depend on how the Controller uses the Processor's services. Possible data subject categories include (former) employees, trainees and interns, applicants, freelancers, shareholders, corporate bodies, family members of employees, customers, interested parties, suppliers, service providers, tenants, business partners, external consultants, visitors and members of the press.

4 Subprocessors

The Processor shall commission the following subprocessors for the data processing, depending on the subject matter of the contract:

Product	Subprocessors	Purpose
d.velop postbox and d.velop documents light	Inxmail GmbH, Wentzingerstraße 17, 79106 Freiburg, Germany	• email notifications
	Telekom Deutschland GmbH Landgrabenweg 151 53227 Bonn, Germany	• data center services
	STACKIT GmbH & Co. KG, Stiftsbergstraße 1, 74172 Neckarsulm, Germany	• data center services
	Businessform – automatisierte Formulardatenverarbeitung GmbH ("businessforms") Kaiser-Friedrich-Ring 23	• Receipt of data (print stream, data, documents, etc.)

	66740 Saarlouis Germany	• Separation of print stream data and merged documents into individual documents and objects • Digital dispatch in d.velop post / d.velop documents light via the provider created specifically for the customer. • If necessary, transfer of the data to a third party for printing and dispatch of the documents to the corresponding recipients
	FP Document Services GmbH ("FP") Barbara-McClintock-Str. 11, 12489 Berlin-Adlershof, Germany	• Receipt of data (print stream, data, documents, etc.) • Separation of print stream data and merged documents into individual documents and objects • Printing and dispatch of the documents to the corresponding recipients.
	d.velop mobile services GmbH Eggeroder Straße 6 48624 Schöppingen, Germany	• platform and software services, PaaS/SaaS
d.velop documents Cloud and all products based on it	Amazon Web Services EMEA SARL ("AWS EUROPE") 38 Avenue John F. Kennedy L-1855, Luxemburg	• Infrastructure, platform and software services, IaaS/PaaS/SaaS.
	Telekom Deutschland GmbH Landgrabenweg 151 53227 Bonn, Germany	• Infrastructure, platform and software services, IaaS/PaaS/SaaS.
	Microsoft Ireland Operations Limited One Microsoft Place South County Business Park Leopardstown Dublin 18, D18 P521 Ireland	• Function "Edit document from d.velop documents in Office Online".
	adeon AG, Brügglistraße 2, 8852 Altendorf, Schweiz	• Manual editing of properties and categories of multiple documents in batch mode • Manual deletion of multiple documents in batch mode
	Inxmail GmbH Wentzingerstr. 17 D-79106 Freiburg/Germany	• Email delivery
	Tiptap GmbH, Kurfürstenstraße 56, 10785 Berlin/Germany	• Content Editor
d.velop contracts for Microsoft 365	Microsoft Ireland Operations Limited One Microsoft Place South County Business Park Leopardstown Dublin 18, D18 P521 Ireland	• Platform services, PaaS • AI-powered content analysis of documents • Processing of document content using large language models (LLMs)
	Telekom Deutschland GmbH Landgrabenweg 151	• data center services

	53227 Bonn, Germany	
d.velop documents for Microsoft 365	Microsoft Ireland Operations Limited One Microsoft Place South County Business Park Leopardstown Dublin 18, D18 P521 Ireland	• Platform services, PaaS
	Telekom Deutschland GmbH Landgrabenweg 151 53227 Bonn, Germany	• data center services
d.velop process studio	Amazon Web Services EMEA SARL ("AWS EUROPE") 38 Avenue John F. Kennedy L-1855, Luxemburg	• Infrastructure, platform and software services, IaaS/PaaS/SaaS.
	Telekom Deutschland GmbH Landgrabenweg 151 53227 Bonn, Germany	• data center services
d.velop sign	Amazon Web Services EMEA SARL ("AWS EUROPE") 38 Avenue John F. Kennedy L-1855, Luxemburg	• Infrastructure, platform and software services, IaaS/PaaS/SaaS.
	Telekom Deutschland GmbH Landgrabenweg 151 53227 Bonn, Germany	• data center services
	D-Trust GmbH, Kommandantenstraße 15, 10969 Berlin, Germany	• Provision of services in the field of electronic signatures and authentication
	Swisscom Trust Services AG, Hardturmstraße 3, 8005 Zürich, Schweiz	• Provision of services in the field of electronic seals
	A-Trust Vertrauensdienste GmbH, Am Nordpark 3, 41069 Mönchengladbach/Germany	• Provision of services in the field of electronic signatures
	DGN Deutsches Gesundheitsnetz Service GmbH, Hüngert 15, 41564 Kaarst, Germany	• Creation of qualified time stamps for electronic signatures
	Inxmail GmbH Wentzingerstr. 17 D-79106 Freiburg/Germany	• Email delivery
d.velop pilot	Microsoft Ireland Operations Limited One Microsoft Place South County Business Park Leopardstown Dublin 18, D18 P521 Ireland	• Content analysis of documents using AI • Processing of document content using large language models (LLM)
	Telekom Deutschland GmbH Landgrabenweg 151 53227 Bonn, Germany	
d.velop cloud migration	Telekom Deutschland GmbH Landgrabenweg 151 53227 Bonn, Germany	• data center services
d.velop connect for Microsoft Dynamics 365	Amazon Web Services EMEA SARL ("AWS EUROPE") 38 Avenue John F. Kennedy L-1855, Luxemburg	• Infrastructure, platform and software services, IaaS/PaaS/SaaS
	Telekom Deutschland GmbH	• data center services

	Landgrabenweg 151, 53227 Bonn/Germany	
d.velop connect for Microsoft Dynamics 365 Business Central	Amazon Web Services EMEA SARL ("AWS EUROPE") 38 Avenue John F. Kennedy L-1855, Luxemburg	• Infrastructure, platform and software services, IaaS/PaaS/SaaS.
	Telekom Deutschland GmbH Landgrabenweg 151, 53227 Bonn/Germany	• data center services
	Konica Minolta Business Solutions Deutschland GmbH Mittlerer Pfad 1 70499 Stuttgart/Germany	• Software services

5 Secure Data Transfer to Recipients in Unsafe Third Countries

For the infrastructure and platform services, the subprocessors use only data centers within the EU, usually within Germany. The subprocessors for the infrastructure and platform services are each certified according to various standards (for example, DIN ISO/IEC 27001).

As a rule, data is processed within the EU, usually within Germany. If this is not possible in exceptional cases because the applicable instructions require the data to be disclosed to recipients in third countries, e.g. to maintain the availability of cloud services during a support incident, this shall only be done if the EU Commission has decided that the third country has an adequate level of protection in accordance with Article 45 of the GDPR, or if the recipient of the data in the third country is subject to appropriate safeguards in accordance with Article 46 of the GDPR in the form of standard contractual clauses (SCC) or binding corporate rules (BCR).

Amazon Web Services EMEA SARL ("AWS EUROPE") in Luxembourg and Microsoft Ireland Operations Limited in Ireland provide subcontracted hosting services to the Processor. Data is therefore explicitly processed in Europe even in these cases. Data is not transferred to unsafe third countries. However, these subcontractors have parent companies in the United States. The United States is subject to laws that are not fully aligned with the current GDPR (Patriot Act and Cloud Act). In light of this fact and in order to assure compliance for the Controller, the Processor shall conclude corresponding data processing agreements that contain the standard data protection clauses adopted as of 06/04/2021 and that include additional measures such as (256-bit) encryption of the personal data. This procedure can be deemed an appropriate safeguard pursuant to Art. 46 GDPR to ensure an adequate level of protection within the meaning of Art. 32 GDPR.

6 Data Processing with Generative AI (d.velop pilot)

d.velop pilot employs generative AI systems that use pre-trained large language models (LLM) to automate document import and analysis and enable the Controller to enter interactive text when working with the documents. The Controller shall assure the data subjects that it meets the legal bases necessary for processing the data with generative AI systems and that it complies with its obligations to notify the data subjects, where applicable.