

GDPR PRODUCT INFO SHEET**BRILJANT ACCOUNT****1. Nature of processing**

Comprehensive accounting software for accountants and SMEs.

2. Categories of Personal Data processed

The Processor will only process the following categories of Personal Data in the context of this Addendum:

- identity data (name, address, mobile phone number, email address, date of birth, etc.)
- identity data issued by the government (national registration number, passport number, etc.)
- contact information (address, email address, IP address, IMEI, etc.)
- social status (position at work, position within the community, family situation, etc.)
- financial information (bank account numbers, loans, mortgages, investments, payment behaviour, ratings, etc.)

3. Categories of Data Subjects

- Controller's customers
- Processor's own customers
- Processor's own employees
- suppliers, consultants, service-providers, authors, etc.

4. Purposes of processing

- finance
- purchasing
- delivery of goods or services
- direct marketing
- other advertising or marketing purposes
- business analytics

5. Retention period

The Processor does not have access to personal data, except when the Controller explicitly gives instructions to carry out a support task.

6. Security measures

As the product is not in a location hosted by the Processor, responsibility for security lies with the Controller.

Detailed technical and organisational measures:	
Access control: buildings	Access to Wolters Kluwer buildings is controlled by both technical and organisational measures: access control with personalised badges, electronic locking of doors, reception procedures for visitors.
Access control: systems	Access to networks, operational systems, user administration and applications require the necessary authorisations: advanced password

	procedures, automatic time-out and blocking for incorrect passwords, individual accounts with histories, encryption, hardware and software firewalls.
Access control: data	Access to the data themselves on the part of Wolters Kluwer is controlled by organisational measures: user administration and user accounts with specific access, personnel trained in data processing and security.

7. Sub-processors

There are no Sub-processors.

8. Transfer of personal data

No transfer of personal data takes place.