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Sub-App 3:1 Exhibit to Processing of Personal Data	2020-03-31	1.1

Approved by	Classification
Anders Wendel, Head of Navelink	Consortium Unclassified Released Public

1.   INSTRUCTIONS

1.1   Brief description of the Services
State all purposes for which Navelink shall process personal data:

For provision of an infrastructure as a service comprising of an identity registry and a service registry intended to use for authentication and identification for authorized users.

1.2   Categories of personal data
State the categories of personal data, which shall be processed by Navelink:

Identity Registry: User-id, name, corporate e-mail address

Service Registry: Corporate e-mail address

1.3   Categories of data subjects
State the categories of data subjects that Navelink's processing of data will concern:

Employees and contractors of the Customer.

1.4   Processing operations
State the processing activities to be performed by Navelink:

Storage, copying, deletion and transfer.

1.5   Location for processing
State the location where processing of personal data will be performed by Navelink:

Germany

2.   SECURITY MEASURES

State all organizational and technical security measures that shall be implemented by Navelink:

2.1   Physical access control
Measures to prevent unauthorized physical access to the infrastructure where personal data is processed:

The datacenters used for the Services have layers of physical security, security personnel on a 24/7 basis and access control system.

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2.2 Access control regarding systems

Measures to prevent unauthorized access to use the infrastructure:

Encryption, user authorization management system within the infrastructure, logging and traceability with Microsoft Authenticator.

2.3 Access control regarding personal data

Measures to ensure that persons with a right to use the infrastructure only can access such personal data, which they are authorized to access:

Multi-factor authentication, such as Microsoft Authenticator, may be added to a user account within the infrastructure, such as e-mail confirmation or e-identification (sv. BankID).

2.4 Access control in connection with transfers

Measures to ensure that personal data may not be read, copied, modified or deleted in connection with electronic transfers or transfers or storage on storage units and that recipients can be identified and verified:

Identity Registry: All data is encrypted upon transfer (TLS) and authorization required.

Service Registry: All data is encrypted upon transfer (TLS), no authorization is required.

2.5 Input control of personal data:

Measures to ensure that it is possible to verify if personal data have been put in, modified or deleted in the infrastructure and by whom:

Logging and traceability.

2.6 Measures to prevent destruction or loss of data:

Measures to prevent accidental or unintended loss or destruction of personal data:

User authorization management system and backup.

2.7 Measures to ensure that personal data collected for different purposes can be processed separately

Measures to ensure that personal data collected for different purposes may be processed separately:

The infrastructure has a system design that separates different types of data posts.

2.8 Duration of processing

Measures to ensure that personal data is deleted during and after the term of the TPD when processing no longer is necessary for the relevant purpose.

Processes describing responsible role(s) for monitoring of the term of the TPD and deletion.

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2.9   Security instructions

Navelink's internal security instructions applicable on the data processing.

3.   PRE APPROVED SUBCONTRACTORS

3.1   Navelink may use the following subcontractors for processing of personal data under the TPD:

Name	Location for processing (Country)
Microsoft Cloud	Germany