

# Appendix 1 – Processing of personal data

## Handling of personal data

These instructions apply for handling of personal data in accordance with the Data Processing Agreement (DPA). In addition to what already is stated in the DPA, the Provider should also follow these instructions.

<b>Purpose</b>	<p>The processing of personal data is done as the personal information controller, and in some cases where the Provider is a personal information assistant for the purpose of to deliver, develop, manage, debug, maintain and administer the Provider's services to the Customers and Partners.</p>
<b>Categories of personal data</b>	<p>As a personal data controller, the Provider process data such as name, e-mail, social security number, address, telephone number and similar contact information to the customer. The Provider also processes usernames and IP addresses.</p> <p>As a personal data processor, additional categories may occur (this is then regulated by personal data controller).</p>
<b>Categories of registrants</b>	<p>As a personal data controller, information about customers, suppliers and partners is processed by the Provider. As a personal data processor, additional categories may occur (this is then regulated by personal data administrators).</p>
<b>Retention</b>	<p>Personal data stored directly in our systems is blocked or anonymized within a reasonable time after the customer has completely terminated his service and our contractual commitment has ceased. Exceptions are data that has legal requirements to be saved longer (eg. financial information for the tax office) and these are saved as long as we have legal requirements to save the information.</p> <p>Information stored indirectly on our services, such as backups of customer data, logs or similar, are specified on our webpage and / or in agreement / terms and are in general stored between 7 days and 12 months depending on service type.</p>
<b>Practical handling</b>	<p>Collection of data as a personally information controller takes place when the customer is registering via the web page, and then also accept our terms and conditions. Customer information is used to identify customers (both manually and automatically) when for example mailing of invoices and communication with support. When ordering third party services such as Domains or SSL Certificates, the required information is sent to third parties. This is also clarified in separate contract terms for domain names.</p> <p>IP addresses and usernames are also processed in the form of logging, monitoring and backup.</p> <p>Processing performed by the Provider in the personal data processor role usually consist of, for example, logging, troubleshooting, monitoring, backup and customer support.</p>

## Technical and organizational security measures

Below some of the actions taken from the Provider as a personal data controller and personal information representative taken to ensure that personal data is processed safely is listed.

<b>Privacy-by-design</b>	Internal development processes and software from our providers are developed using routines and processes based on a built-in data protection.
<b>Physical protection</b>	Storage space for personal data, such as server halls and offices, should be protected by appropriate access controls to ensure that only authorized personnel are accessed.
<b>Protection against malicious code</b>	Relevant systems should be protected from viruses, trojans and other forms of digital intrusion.
<b>Restriction of access</b>	Login and access are role-based and individual-based, and staff and systems do not have more access than is necessary to perform the task.
<b>Backup</b>	The supplier has backups both on systems where it processes personal data as a controller, and where our customers process their customers personal data.
<b>Logging</b>	The Provider has a logs about access and change of personal data.
<b>Encryption</b>	All communication over the internet between systems that handle personal data is encrypted.
<b>Risk assessment</b>	The Provider conducts ongoing risk analyzes of our systems and services.
<b>Processes och routines</b>	The Provider has clear processes and procedures for the different types of treatments performed.
<b>System register</b>	The Provider has the best tools to get a good control of the systems, entities and organizations that process personal data.