

PACTIUS Privacy

Simple data protection compliance

PACTIUS Privacy is a compliance tool, which may help your organisation live up to the strengthened requirements for processing of personal data in the data protection legislation. With PACTIUS Privacy you get an easy-to-use and effective tool for documenting and managing your organisation's processing of personal data in order for you to ensure compliance with the General Data Protection Regulation.

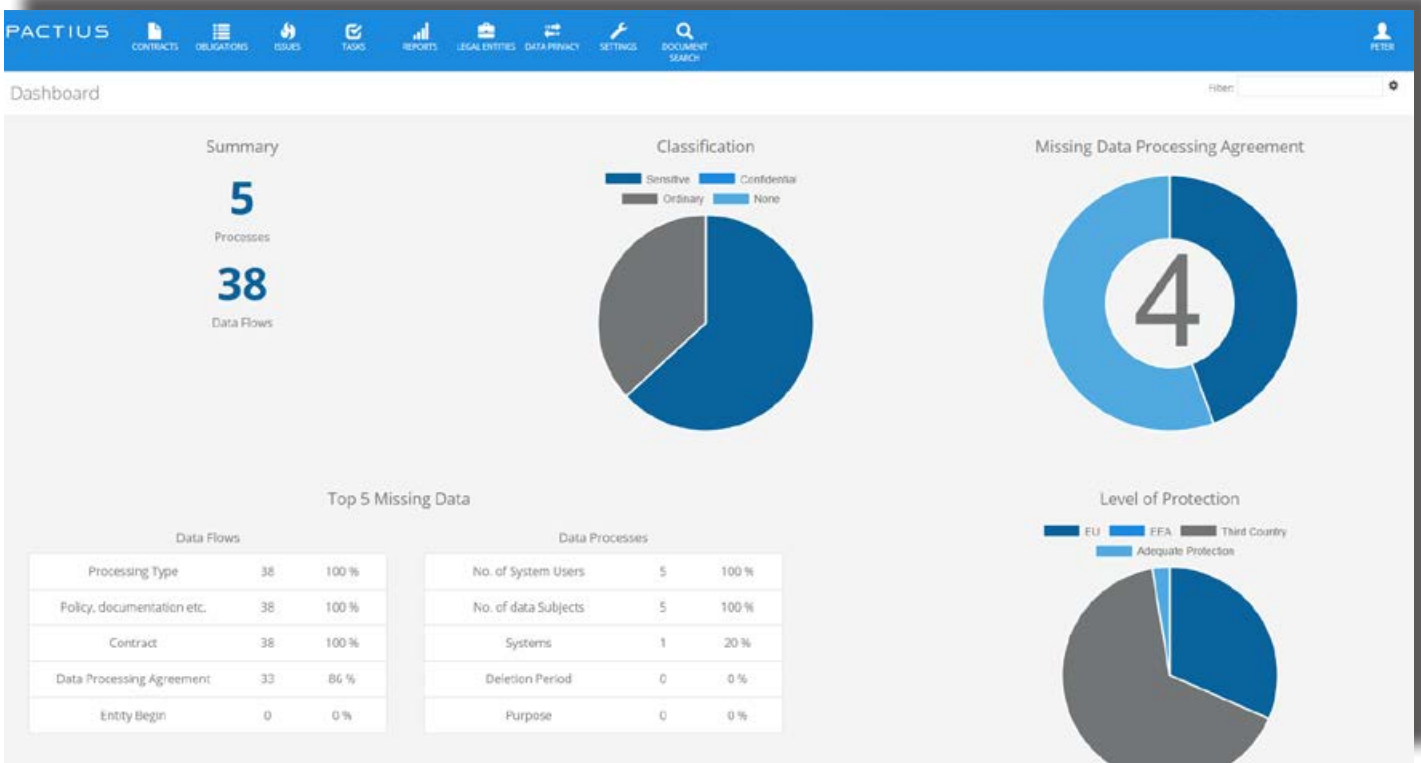
Over the past years, focus has intensified on the processing of personal data by undertakings, authorities and organisations – and in particular on their compliance with the data protection rules. This is not least due to the General Data Protection Regulation, which must be applied as from 25 May 2018. With the General Data Protection Regulation, requirements regarding processing of personal data will be intensified for undertakings, authorities and organisations.

A practical tool

PACTIUS Privacy is a module added to the contract management system, PACTIUS. As a compliance tool, PACTIUS Privacy may support your practical compliance work in the organisation. The system features may be adjusted to the specific processing of the personal data in the individual organisation with a view to complying with the requirements of the General Data Protection Regulation.

With PACTIUS Privacy, you may, among other things,

- Build the organisation's platform for its work with data protection compliance.
- Prepare lists of processing activities.
- Generate key figures for management and other relevant reports regarding processing as well as risk assessments.
- Manage the organisation's ongoing work with data protection compliance.
- Strengthen the work with privacy policies, process descriptions and data processor agreements via features from the PACTIUS contract management tool.
- Make searches across all registrations regarding processing in the system, including in the text of uploaded data processor agreements and export information to Excel.



PACTIUS Privacy

Simple data protection compliance

Compliance with the Regulation

PACTIUS Privacy has been developed in a unique cooperation between highly specialised and market-oriented lawyers and IT experts and accordingly the system at all levels takes into account the practical and legal work involved in data protection compliance, including the requirements in the new data protection legislation.

List of processing activities

PACTIUS Privacy, among other things, makes it possible for you to prepare lists of your organisation's processing activities and ensure that you may easily be able to document these activities to the Danish Data Protection Agency in accordance with the requirement in article 30 of the General Data Protection Regulation to keep lists of processing activities. When your processing activities involving personal data are registered in the system you may generate lists with just a few clicks of the mouse.

With PACTIUS Privacy, you may:

- Compile information about all your processes and data streams
- Easily register the information in the right information categories
- Prepare a wide range of relevant reports
- Prepare lists for data inspection
- Intuitively establish and change processes.

Accountability requirement

Accountability is one of the new requirements in the General Data Protection Regulation of decisive importance. When you process personal data, you must be able to prove that you comply with the Regulation, among other things, by registering reasons for processing data and documenting that, in your capacity as data controller or data processor, you have implemented suitable security measures. This means that as data controller you must be able to document that you focus on security in your processing of personal data in the organisation and e.g. conduct internal control with compliance with the rules, control with the security at data processors, etc.

With PACTIUS Privacy, you may:

- Document accountability
- Systematically follow up on processing, policies and controls
- Maintain the broader perspective, even though the volume of personal data in the organisation is growing
- Delegate tasks to the persons responsible for the processing
- Connect data protection law documents and other contract documents

Handling the duty of disclosure

PACTIUS Privacy will also help you ensure that the duty of disclosure is handled correctly. Due to the duty of disclosure, the data controlling authority, undertaking, etc., has a duty to provide information to the data subject that information about the data subject is processed. This is typically ensured in various privacy policies and brief texts and PACTIUS Privacy may ensure the correct basis for this information.

With PACTIUS Privacy, you may:

- Get an overview of the information you have about the data subjects
- Get an overview of where information is disclosed
- Create both pre-defined and individual reports on personal data
- Make easy searches in data categories in the database.

PACTIUS Privacy

Simple data protection compliance

Overview of data processors

If an undertaking or an authority uses a data processor who gains access to the organisation's personal data, it is already today a statutory requirement that a written agreement must be concluded with the data processors. If the data processor is established outside the EU, additional requirements must be met. The agreement extends, among other things, to which information the data processors obtain access to, requirements as to security, what they are entitled to use the information for, how many people may gain access, use of sub-suppliers, etc.

With PACTIUS Privacy, you may:

- Get an overview of the organisation's data processors
- Get an overview of whether the data processors are established outside the EU
- Get an overview of which agreements have been entered into and which are e.g. outstanding
- Manage data processor agreements.

The direct access to the contract management system PACTIUS makes it easy to collect all data processing agreements in one place and ensure that you have an overview of relevant documents, obligations, tasks and rights.

High level of data security

In PACTIUS Privacy, data security is a matter of top priority. The system runs on the ISO-certified Microsoft Azure platform, and all data is stored in a secure manner within the borders of the EU at Microsoft's data centres in Dublin and Amsterdam.

PACTIUS Privacy may be used by anyone, be it one person, a single department, a company or an entire group. You may also grant segmented access such that the access is limited to individual units in the organisation.

The screenshot displays the PACTIUS Privacy web application interface. At the top, a navigation bar includes icons for Contracts, Obligations, Issues, Tags, Reports, Legal Entities, Data Privacy, Settings, and Document Search. The main content area is titled 'Data Process: CRM' and features a summary card with the following details:

- Data Process:** CRM
- Purpose:** IT - systems and processes
- Data Subjects:** Customers@B2B, Customers@consumers@2CL, Employees
- Data Process Owner:** Thomas Larsen
- No. of System Users:** 0
- No. of data Subjects:** 0
- PIA:** 5 Years
- Systems:** CRM
- Security Measures:** Global group security policy
- Probability Score:** 0
- Consequence Score:** 0

Below the summary card, there is a 'Data Flows' section with a table listing individual data processing flows. The table has columns for Sequence, Dataflow Id, Entity Begin, Controller Processor Begin, Entity End, Controller Processor End, Data Process, and Data Process Owner. The first five rows show flows from 'BB Company' to 'Data Processor' for 'CRM', while the sixth row shows a flow from 'BB Company' to 'Subprocessor' for 'CRM Cloud Solutions'. Each row includes edit and delete icons.

Sequence	Dataflow Id	Entity Begin	Controller Processor Begin	Entity End	Controller Processor End	Data Process	Data Process Owner
1	BB1	Data Controller	BB Company	Data Processor	CRM	Thomas Larsen	
1	BB2	Data Controller	BB Company	Data Processor	CRM	Thomas Larsen	
1	BB3	Data Controller	BB Company	Data Processor	CRM	Thomas Larsen	
1	BB4	Data Controller	BB Company	Data Processor	CRM	Thomas Larsen	
2	BB Company	Data Processor	CRM Cloud Solutions	Subprocessor	CRM	Thomas Larsen	

PACTIUS Privacy

Simple data protection compliance

Functionality	The General Data Protection Regulation	PACTIUS Privacy
Dashboard <ul style="list-style-type: none"> • Visual infographic for e.g. overview, reporting, etc. 		✓
Reports <ul style="list-style-type: none"> • List of processing activities • Other reports of relevance to the work with data protection compliance • Management specific reports, including risk assessments 	✓	✓ ✓ ✓
Risk assessments <ul style="list-style-type: none"> • Overview of the organisation's risk level • Calculation of the organisation's risk level • Risk management of the organisation's processing of personal data 	✓	✓ ✓ ✓
Documentation requirement (Accountability) <ul style="list-style-type: none"> • Documentation of compliance with the Regulation • Documentation of compliance with the basic principles • Overview of data controllers to whom information is disclosed 	✓ ✓ ✓	✓ ✓ ✓
Duty of disclosure <ul style="list-style-type: none"> • Statutory basis • Transfer of information to third countries 	✓ ✓	✓ ✓
Right of access <ul style="list-style-type: none"> • Basic information, e.g. object and period of storage • Categories of personal data 	✓ ✓	✓ ✓
Data processor agreements <ul style="list-style-type: none"> • Overview of data processors • Storage of data processor agreements 	✓	✓ ✓
Transfer of information to country outside the EU <ul style="list-style-type: none"> • Overview of transfers to countries outside the EU • Registration of specific basis of transfer • Storage of any standard agreements 	✓ ✓	✓ ✓ ✓

Contact

PACTIUS Privacy is owned by the company Pactius A/S, in which Bech-Bruun Law Firm is a major shareholder. PACTIUS has been developed by Bech-Bruun in collaboration with Gestion. Should you have any questions, feel free to contact:

Charlotte Bagger Tranberg
 Personal data specialist
 Bech-Bruun
 T. +45 25 26 34 76
 E. cbt@bechbruun.com

Thomas Munk Rasmussen
 Partner
 Bech-Bruun
 T. +45 25 26 33 55
 E. tmr@bechbruun.com

Mikkel Friis Rossa
 Partner
 Bech-Bruun
 T. +45 25 26 33 59
 E. mif@bechbruun.com

Peter M. Bundgaard
 Manager
 Pactius A/S
 T. +45 20 20 79 99
 E. pmb@pactius.com



BECH-BRUUN **GESTION**