



DATA PROCESSING AGREEMENT

LUCRASOFT SOLUTIONS B.V.

Comprised of:

Part 1. Data Pro Statement

Part 2. Standard Clauses for Data Processing

Version: 2024-01

PART 1: DATA PRO STATEMENT

Along with the Standard Clauses for Data Processing, this Data Pro Statement constitutes the data processing agreement for the product or service provided by the company that has drawn up this Data Pro Statement.

GENERAL INFORMATION

1. This Data Pro Statement was drawn up by

Lucrasoft Solutions B.V. - De Zelling 8, 3342GS Hendrik-Ido-Ambacht, The Netherlands

If you have any queries about this Data Pro Statement or data protection in general, please contact: solutions@lucrasoft.nl, +31 78 68 11 502

In the event of any discrepancies between the English version and the Dutch version of this Data Processing Agreement, the Dutch version shall prevail, provided that the intended content of the documents is the same.

2. This Data Pro Statement will enter into force on 12-03-2024

We regularly revise the security measures outlined in this Data Pro Statement to ensure that we are always fully prepared and up to date with regard to data protection. If this document is updated, we will notify you of the revised versions through our regular channels.

3. This Data Pro Statement applies to the following products and services provided by the data processor

Lucrasoft Solutions B.V. develops software applications and integrated app and web solutions for the management of operational business processes.

4. Description of product/service

Lucrasoft Solutions B.V. offers the following applications and integrated solutions:

- A. DEPOT Software – Server Edition (SE)
- B. DEPOT Software – Cloud Edition (CE)
- C. DEPOT Customer Portal (DCP)
- D. DEPOT for Mobile (DFM)
- E. DEPOT Stacker Terminal (DST)
- F. DEPOT Driver Kiosk (DDK)
- G. DEPOT Software Hub
- H. SYNDA

5. Intended use

A. DEPOT Software Server Edition (SE)

This solution was designed and configured for processing the following types of data:
Data for management of operational business processes.

Data is stored in a Microsoft SQL Server database. The solution is kept and maintained within the server park of the client and no communications are exchanged externally. The DEPOT Software API is hosted on a Lucrasoft Azure Server and communicates order data with various external clients, described later in this document.

In the case of this product, the processing of special personal data or data in relation to criminal convictions and offences was not taken into account. The client can process this data with the aforesaid product or service at its own discretion.

For support purposes, database copies are sometimes temporarily stored on the server of Lucrasoft Solutions B.V. For the storage and management of a copy database, Lucrasoft Solutions B.V. may use the services of the sub-processor Lucrasoft Systems B.V. (see article 9 for privacy statement)

B. DEPOT Software – Cloud Edition (CE)

This solution was designed and configured for processing the following types of data:
Data for management of operational business processes.

Data is stored in a Microsoft Azure SQL Server database and BLOB Storage in the Azure Cloud. Data is exchanged between clients over the internet. The DEPOT Software API communicates order data with various external clients, described later in this document.

In the case of this product, the processing of special personal data or data in relation to criminal convictions and offences was not taken into account. The client can process this data with the aforesaid product or service at its own discretion.

For this product, Lucrasoft Solutions B.V. uses the services of sub-processor Microsoft Azure (see article 9 for privacy statement)

C. DEPOT Customer Portal (DCP)

This solution was designed and configured for processing the following types of data: This solution is an online web portal. It is linked to DEPOT Software (A, B) through the DEPOT Software API. Order data is exchanged.

In the case of this product, the processing of special personal data or data in relation to criminal convictions and offences was not taken into account. The client can process this data with the aforesaid product or service at its own discretion.

For this product, Lucrasoft Solutions B.V. uses the services of the sub-processor, Lucrasoft Digital B.V. (see article 9 for the privacy statement).

D. DEPOT for Mobile (DFM)

This solution was designed and configured for processing the following types of data: The solution is an Android app. It is linked to DEPOT Software (A, B) through the DEPOT Software API. Order data, time registration data and pictures are exchanged.

This product sometimes saves a snapshot of order and time registration data of an order for recovery purposes, until an order was successfully uploaded.

In the case of this product, the processing of special personal data or data in relation to criminal convictions and offences was not taken into account. The client can process this data with the aforesaid product or service at its own discretion.

E. DEPOT Stacker Terminal (DST)

This solution was designed and configured for processing the following types of data: A WPF means of communication that is linked to DEPOT Software (A, B) using a direct connection with the local network of the customer. Order data is exchanged.

This product sometimes saves a snapshot of data of an order for recovery purposes, until an order was successfully uploaded.

In the case of this product, the processing of special personal data or data in relation to criminal convictions and offences was not taken into account. The client can process this data with the aforesaid product or service at its own discretion.

F. DEPOT Driver Kiosk (DDK)

This solution was designed and configured for processing the following types of data: The solution is an Android app. It is linked to DEPOT Software (A, B) through the DEPOT Software API. Order data is exchanged.

No data is stored locally.

In the case of this product, the processing of special personal data or data in relation to criminal convictions and offences was not taken into account. The client can process this data with the aforesaid product or service at its own discretion.

G. DEPOT Software Hub

The DEPOT Software Hub is an online connection broker that runs in the Lucrasoft Solutions B.V. Azure Cloud for the DEPOT Software API. It does securely expose API functions from a DEPOT Software instance (A, B) to client applications. No data is stored.

In the case of this product, the processing of special personal data or data in relation to criminal convictions and offences was not taken into account. The client can process this data with the aforesaid product or service at its own discretion.

For this product, Lucrasoft Solutions B.V. uses the services of sub-processor Microsoft Azure (see article 9 for privacy statement)

H. SYNDA

SYNDA processes point-to-point EDI files. Order data is stored for a maximum of 7 days for audit purposes.

In the case of this product/service, the processing of special personal data or data in relation to criminal convictions and offences was not taken into account. The client can process this data with the aforesaid product or service at its own discretion.

For this product, Lucrasoft Solutions B.V. uses the services of sub-processor Microsoft Azure (see article 9 for privacy statement)

For this product, Lucrasoft Solutions B.V. uses the services of the sub-processor, Lucrasoft Digital B.V. (see article 9 for the privacy statement).

6. When the data processor designed the product or service, it applied the *privacy-by-design* approach in the following manner:

- General
 - o The login details of individuals are stored by means of encryption.
- Windows Applications
 - o The Windows applications have a solid authentication structure with roles and rights in order to guarantee the privacy of data.
- Web Applications
 - o All our web solutions come with an SSL certificate as a standard.
 - o We do not use the collected data and the visitor tracking and we will only view the data at the client's request, for instance, when this is necessary in order to resolve a support query or a breakdown.
- SYNDA specific
 - o We do not collect information that can be used to identify individuals. After successful transfer the data is removed after 7 days. On failed transfer, the data is removed after 30 days. Furthermore, Synda does not retain any data that contains personal details.

7. The data processor adheres to the Data Processing Standard Clauses for Data Processing /its own data processing agreement, which can be found in this document.

8. The data processor processes the personal data of its clients within the EU/EEA and, in connection with a fall-back scenario, also in the US.

9. The data processor uses the following sub-processors:

Sub-processor	Within the EU/EEA	Privacy statement
Microsoft Azure	Yes	https://privacy.microsoft.com/nl-nl/privacystatement
Lucrasoft Digital B.V.	Yes	https://www.dutchgrit.nl/nl/privacy-statement/
Lucrasoft Systems B.V.	Yes	https://www.lucrasoftitbeheer.nl/nl/privacy-statement/

10. The data processor will support its clients in the following way when they receive requests from data subjects:

Requests to inspect, correct or remove data will be carried out after the identity of the data subject has been verified on the basis of valid proof of ID. Requests can be submitted to info@depotsoftware.com. After receiving the request, we will process and confirm/deliver within five (5) working days.

11. Termination of the agreement:

After termination of the agreement with a client, the data processor, in principle, removes the personal data that it processes for the client within three (3) months (or earlier, if explicitly requested) in such a way that it can no longer be used and is no longer accessible (it is rendered inaccessible).

Backup retention means that the data is, indeed, removed after three (3) months. As this concerns an automated process, manual or earlier removal is not possible.

SECURITY POLICY

12. The data processor has implemented the following security measures to protect its product or service:

- A. The data centres (Databarn Rivium & Databarn Amsterdam), where Lucrasoft ICT Groep has servers, are equipped with camera surveillance and visitor registration systems and are ISO:27001:2013-certified.
- B. The (database) servers can be accessed only via Lucrasoft's trusted network locations.
- C. Procedures are in place, which means only authorised personnel have access to the personal data. A non-disclosure agreement ensures this still applies when a member of staff leaves the company.
- D. Our web servers and database servers are firewall-protected in accordance with the least privileged principle. Applications have their own database for every application. Every application has access to its own database only.
- E. All data within Lucrasoft Solution B.V. services will be stored as securely as possible. Encryption will be used where possible.
- F. All data will be transmitted with the highest possible form of encryption that is supported.
- G. Our web servers are patched in accordance with the latest Window updates every month.
- H. All mobile carriers (such as laptops, USB sticks and portable HDs) of Lucrasoft Solutions B.V. are encrypted.

DATA LEAK PROTOCOL

- 13. In the unfortunate event that something does go wrong, the data processor will follow the following data breach protocol to ensure that clients are notified of incidents:**

The Data Protection Officer (or DPO) will be notified of the possible data breach. A relevant internal data breach procedure is in place. He will set up a team in order to analyse the cause, the impact and the affected customers. Depending on the outcome of this analysis, customers will be notified by means of an e-mail that is sent to the technical contact person within 24 hours.

Lucrasoft Solutions B.V. will provide highly detailed information about:

- A. The nature of the breach, including a description of the incident, the nature of the personal data or categories of affected data subjects, an estimate of the number of affected data subjects and databases that may be affected, as well as an indication of when the incident occurred;
- B. Any measures already taken by Lucrasoft Solutions B.V. in order to stop the breach;
- C. Any measures to be taken by the controller or the affected data subjects (what can the affected data subjects themselves do, such as “keep an eye on your e-mails, change your passwords”);
- D. Any measures to be taken by Lucrasoft Solutions B.V. in order to prevent a future breach.

Clients are notified within 24 hours, if possible. Lucrasoft Solutions B.V. does not own the data and cannot notify AP or data subjects. The data processor will support the client or the controller during the notification process, if so required.

PART 2: STANDARD CLAUSES FOR DATA PROCESSING

Version: April 2021

Along with the Data Pro Statement, chapter 2 of the NLdigital Terms 2020 constitutes the data processing agreement. The Data Pro Statement and the NLdigital Terms 2020 are always attached to every agreement.