

Effective as of May 22<sup>nd</sup>, 2018

# **Effectmakers GDPR policy**

The purpose Effectmakers services are solely to facilitate our clients to do Business-to-Business sales planning with our software solution called BMS, Business Management System. Our services do not in any way relate to Business-to-Consumer relations for our clients. Nor do Effectmakers interact directly with consumers. The risk level when it comes to handling personal data is low. The only personal data Effectmakers come in contact with are:

- The name, email, business phone number and role of the persons who are working for our clients and in their job function has been given the right to use the Effectmakers BMS software solution.
- The change logs of the users who are changing business planning data in the software (audit trails).
- The name, email and business phone number of the end users who raise tickets in our support helpdesk system.
- Anyone who has signed up for our public newsletters.

#### **On-premise software**

In the case that the client has chosen to run the software on-premise in their own or 3<sup>rd</sup> party hosting center, then Effectmakers is not considered as being the data-processor.

However, all employees of Effectmakers who is granted the right to access the BMS Software in the client's hosting environment have been made aware of guidelines set by the client and general guidelines to ensure proper treatment of the client's data. All Effectmakers employees have committed confidential agreements.

## **Hosted by Effectmakers**

If the client is using the Effectmakers BMS software through Effectmakers cloud hosting solutions, then Effectmakers is acting as data-processor on behalf of the client who is the data-controller. Effectmakers software is hosted in Microsoft Azure EU datacenter. Effectmakers use our own Virtual Environment and do not rely on any shared services from Microsoft. This means that Microsoft has no legal access to any data processed by Effectmakers.

All the client's data are kept in separate databases and folders per client.

You can read more about Azure compliance here: https://www.microsoft.com/en-us/servicesagreement/

### Managing user logins

For clients using Effectmakers BMS cloud hosted by Effectmakers, user logins are created and deleted on client's requests.

Clients running Effectmakers BMS on-premise have own responsibility for all aspects of user login management.

For new users signing up online for the 2 months free license for an evaluation of Effectmakers BMS without purchasing a license or engaging in a project with Effectmakers, their data will be deleted after the 2 months off evaluation period.

#### Audit trails

All actions carried out by the users are logged into an audit trail containing the date and time, user login and activity. The audit trail is kept in the software for 18 months for clients to be able to track back changes in their own data. When a user is deleted, all entries in the audit trail log is anonymized after 30 days.

#### Support tickets

All emails send from and to Effectmakers support and support phone calls are restricted to our help desk management software. This is a 3rd party solution provided by Teamwork Desk.

All tickers are kept for 18 months for the clients to be able to track back for a full planning cycle for any similar issues, after this, they are deleted automatically.

Read the policies for Teamwork Desk here: https://www.teamwork.com/security



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#### **Newsletters**

Persons who subscribe for our newsletter will occasionally receive news about Effectmakers software and services. The subscribers can unsubscribe anytime and automatically their email will be deleted from Effectmakers subscribers' list.

Our newsletters are handled through a 3<sup>rd</sup> party software provided by MailChimp.

You can read their policies here: <a href="https://kb.mailchimp.com/accounts/management/about-the-general-data-protection-regulation">https://kb.mailchimp.com/accounts/management/about-the-general-data-protection-regulation</a>

#### **General terms and contracts**

For most of our clients, we have business-2-business contracts covering all aspects of the cooperation including confidentiality and compliance in general.

For clients without a specific contract agreement, we offer the following conditions: <a href="http://effectmakers.com/media/1881/terms-of-use.pdf">http://effectmakers.com/media/1881/terms-of-use.pdf</a>