



Short Public Report

Recertification No. EP-S-QZ6TVW

1. Name and version of the IT product and IT-based service:

IT product: ProCampaign, version 8.0

IT-based service: ProCampaign, functional status: June 2018

2. Manufacturer / vendor of the IT product and Provider of the IT-based service:

Company Name: Consultix GmbH

Company Address: Wachtstrasse 17-24, 28195 Bremen, Germany

Web: <https://www.consultix.net>

Contact Person: Andres Dickehut, CEO Consultix GmbH

3. Time frame of evaluation:

2017/10/31 – 2019-01-07

4. EuroPriSe Experts who evaluated the IT product and IT-based service:

Name of the Legal Expert: Dr. Irene Karper

Address of the Legal Expert: datenschutz cert GmbH
Konsul-Smidt-Str. 88a
28217 Bremen, Germany

ikarper@datenschutz-cert.de

Name of the Technical Expert: Alexey Testsov

Address of the Technical Expert: datenschutz cert GmbH
Konsul-Smidt-Str. 88a
28217 Bremen, Germany

atestsov@datenschutz-cert.de

and since 2018-06-28: Dr. Irene Karper

datenschutz cert GmbH
Konsul-Smidt-Str. 88a
28217 Bremen, Deutschland

5. Certification Authority:

Name: EuroPriSe Certification Authority
Address: Joseph-Schumpeter-Allee 25
53227 Bonn
Germany
eMail: contact@european-privacy-seal.eu

6. Specification of Target of Evaluation (ToE):

ProCampaign is a multi-functional web based application to support the Customer Relationship Management (CRM) used by public authorities (e.g. in the field of tourism or city marketing) or companies, especially internationally oriented business.

Vendor is the Consultix GmbH. (limited) with its headquarter in Bremen, Germany, which continuously develops the application and which hosts the systems (on behalf of the contracting party) in a self-owned data center. Therefore, the evaluated target is an IT product as well as an IT-based service, however the application is consistently called "ProCampaign".

7. General description of the IT product and IT-based service:

The focus of ProCampaign is the collection and processing of personal data to support the CRM. Users are companies or bodies using ProCampaign for their own purposes. The Consultix GmbH. also operates as the data processor of the IT-based service "ProCampaign".

7.1 Purpose and area of application

The user collects and processes data of consumers or end users by means of ProCampaign. It typically relates to natural persons. To avoid misunderstandings,

data subjects are referred to as consumers. The customers of the Consultix GmbH. are subsequently referred to as users. To support the CRM, personal data of consumers are fed into the database of ProCampaign and can be evaluated or conditioned for market analysis, consumer retention measures or to optimize marketing campaigns. ProCampaign is designed as a data warehouse and allows the user to manage data that he receives through various marketing campaigns. The user can either transfer existing own customer data in ProCampaign, or in the context of a participation of consumers for an online-marketing campaign (e.g. via an electronic newsletter, online sweepstakes, online registrations for closed user groups on websites or new: per mobile phone numbers) the user generates new data, which are directly transferred by data fields on the website (so called transaction).

The definition of the data fields and the processing by ProCampaign lies within the legal responsibility of the user. ProCampaign supports compliance with the relevant data protection provisions by providing the user with an informative leaflet on data protection which supports the user in the legally compliant establishment and use of ProCampaign. Also, the origin of data generated and stored in the system ProCampaign can be traced at any time according to the basis of the respective transaction.

The focus of ProCampaign however is mainly the so-called permission marketing, i.e., it supports the obtaining and (traceable and provable) management of consent statements in the respective data collection and data processing. Need for and requirements of consent of the consumer in data collection and data usage vary depending on the means of communication of direct advertising and the respective legal provision. For submitting information through different channels, e.g. mail, offline (postal advertisement), mobile phone etc., there are different attributes, like being a participant of lottery XY or being a consumer of the product XY.

If a consumer gives his consent, this is understood as opt-in. Else if this consumer revokes his consent, this will be referred to as opt-out. Depending on the communication channel (for example e-mail, SMS, mailing) an opt-in, opt-out and an explanation of the right of objection is required, depending on the relevant legal provision. ProCampaign assigns these features to the relevant list and manages these requirements comprehensibly. In the context of the registration to receive an email newsletter the so-called "double-opt-in" procedure is applied, i.e. the consumer signs up for the email newsletter and will receive an e-mail to the specified address with a request to confirm the order by clicking on a link; the consumer receives the newsletter only after confirmation. The double-opt-in process assures in greatest extent that the recipient has actually consented to receiving advertising emails so that this marketing does not represent undue harassment. On the basis of filed transactions, it is also traceable at any time, whether relevant changes to the marketing campaign were made, such as the change of the privacy information for the consumer. New to this re-certification is that the text of the consent statements with the respective version numbers are saved as a history.

Here too, the user remains legally responsible for the data collection and use of information for advertising purposes. He is made aware of the requirements in the course of the use of ProCampaign in form of the aforementioned leaflet with explanatory remarks about privacy. This information sheet is available both in German and in English language. Furthermore, it was adapted to the requirements of the General Data Protection Regulation (GDPR).

The system is separated according to user clients. ProCampaign offers an exemplary differentiated role and authorization concept for access of the user to his data. This allows the user to grant to different roles only the access that is needed for each role.

ProCampaign has a separate input mask for complaint management, called ProComplaint, for users who also manage their complaint management with ProCampaign via their own call center.

7.2 Audited range of functions in the standard version

ProCampaign in the audited version includes the following functions:

- Deduplication of records

A built-in duplicate detection based on specific criteria, prevents that several database profiles are created in ProCampaign. The following criteria are considered:

- Name, Surname and e-mail address
- E-mail address and date of birth
- Name, surname, postcode and street

The user is able to declare more criteria to adjust the duplicate detection.

- Obtaining and management of the consent of the consumer

Creating and depositing declarations of consent (opt-in), as well as of objections (opt-out) for identifiable means of communication. Therefore, a consumer is able to have multiple opt-ins, e.g. for receiving e-mail, mail or SMS/MMS. Furthermore, the consumer is able to declare specific opt-outs.

- Optional at the customer's request: Postal address check and correction

If a new profile is created with a postal address in the database, a post-address check is performed with subsequent correction of a wrong postal address (if this post-address check is desired by the user). This procedure will be repeated once the postal address is changed. There is also a spelling verification and an automatic correction if necessary. The described

correction is done by the system itself, there is no need for an export. The Consultix GmbH acquires on behalf of the user a license for an anonymous address database, against which is checked locally. This comparison does not use any data except the address. A manual selection of verifiable data is not concerned. Since this postal address check is not contained in the standards of ProCampaign, it is therefore not in the scope of this audit.

- Assignment of registration numbers

Assigning unique registration number facilitates the identification of persons and actions. These registration numbers are generated in the database and checked afterwards.

- Exclusion of certain users

If the consumer has in the past given his consent to the sending of information (e.g. by e-mail or mailing) and now contradicts this consent, he will receive an opt-out. This ensures that this consumer is no longer contacted via this channel.

- Cleanup Process

The following data cleaning concept is relevant:

- Newsletter cannot be delivered (hardbounce)
- Profiles stay inactive for a longer time
- Profiles of consumers, that are younger than 16 years old
- Withdrawing of a consent of a consumer
- There is no response to the second opt-in inquiry

If a newsletter cannot be delivered (hardbounce), this fact is sent back to ProCampaign by e-mail. This unencrypted e-mail contains the e-mail address of the consumer as personal data. Profiles in which newsletters do not arrive repeatedly should be automatically deleted after a certain period of time (3 bounces). Also, profiles that are inactive (profiles for which no transactions –

e.g. participation, newsletter response - have been reported for 18 months) are deleted. Profiles of consumers who are younger than 16 years old, are also deleted in all lists. Since these profiles are found in statistics, a multi-level deletion of the data takes place. For the adaptation to the DSGVO, the concept was significantly narrowed and designed for data minimization. In the first step, the profiles' opt-ins are removed. In the second step, those profiles that have no more permissions for 6 months are marked as deleted. A month later the personal attributes are removed (a personal reference can no longer be created), 24 months later all transactions are deleted. Log files for those deletions are stored for one month. Offline returners (i.e., a mailing by mail has not arrived at the recipient) arrive at a separate list.

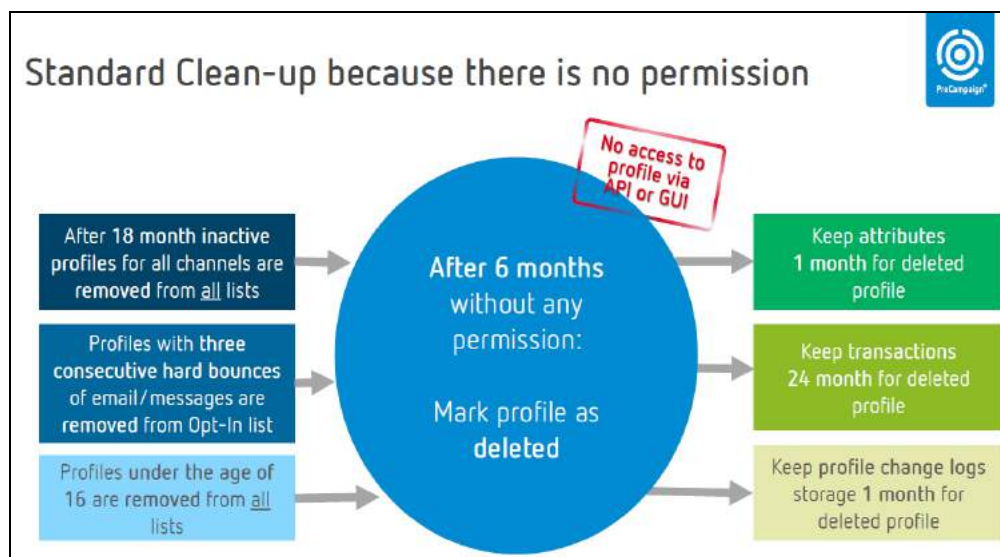


Figure 1: Cleanup-Process of ProCampaign

After a revocation, the corresponding profile is marked as deleted. This means that the user cannot access the profile anymore. Only the technical administrator can restore the profile at the consumer's request. After four weeks, all attributes of the profile are deleted during regular data cleaning. Furthermore, the transactions stored in the profile are made anonymous. After another 24 months these anonymous transactions will be finally deleted. If the opt-in is not confirmed, the basic distribution of ProCampaign is designed to wait a total of four weeks for the confirmation of the opt-in.

After two weeks, a reminder is automatically sent to the specified e-mail address. If there is no opt-in within another 2 weeks, the profile will be deleted in the same way as described above for a revocation, via the cleanup process after 6 months. The customer can deviate from the basic version and choose other deadlines at its own desire and responsibility.

The secondary data are also automatically deleted after certain time periods. The storage time depends on the content and the purpose of the log data. In the IPS, only conspicuous IP addresses identified as attacks are stored. IP addresses identified as an attacker are moved to quarantine. The IP addresses in the Netflow_Log are anonymised after 24 hours at the latest by deleting the two last octets. The log files are deleted after 12 months. Log files of the XML server's Web server are deleted after 7 days. They are evaluated exclusively on complaints. The log files only record the actions of consumers who have given their consent to the storage of their data and whose data are stored in the database. Clearing after 7 days is considered appropriate. Logfiles of the https web server (GUI server) are deleted after 12 months since Consultix GmbH. is contractually obligated to the user in the ASP contract to ensure that it can be subsequently verified and ascertained whether and by whom personal data in data processing systems entered, changed or removed (input control and logging of changes). In the case of a shorter storage period, Consultix would have to be released from the requirement. The audit log records only the IP addresses of the Consultix systems that generate an event, in the case of consumer activities, the IP address of the XML API. The storage of the consumer IP only takes place in the data area of the log, in which the personal data of the consumer, for which there is corresponding consent and which have been recorded in the corresponding transaction, are stored. The audit log is deleted after 6 months. The log data for the administrative access to the database is also

deleted after one year. Here too, the contractual obligation to provide proof vis-à-vis the customer is pertinent.

- Optional at the customer's request: Mover Check

For those returns, an additional mover check can be used, for spotting new addresses if necessary. For this purpose, data is forwarded on behalf of the customer to another service provider through media disruption (i.e. not automated via ProCampaign). The current data can then be entered back into ProCampaign via the DataEntryCenter. The Mover-Check must be ordered separately and is not included in the standard scope of ProCampaign, and therefore does not form part of the audit subject.

- Optional at the customer's request: Investigation and clarification of violations of the customer's respective conditions of participation in the context of unauthorised multiple registrations or voucher/coupon fraud

This data processing depends on the respective conditions of participation of a marketing campaign of the company towards the participating consumers. If a consumer takes part in a marketing campaign, its legality is checked. This procedure includes an individual age check (e.g. lottery at 18, newsletter at 16 years old), legal multiple registrations review and postal code check, if necessary. This is not included in the standard scope of ProCampaign and therefore does not form part of the audit subject.

- Evaluation and analysis of resource

With ProCampaign, individual evaluations can be created for individual mailings and other marketing campaigns (for example, total number of participants, evaluation of surveys). These analyses may also relate to personal data, e.g. "How many of the participants are from the city X?", "How many of the participants are X years old?".

- Optional at the customer's request: Determination of the "Most Valuable Consumers":

ProCampaign provides the technical possibility to store algorithms for the calculation of states. Those algorithms are transferred by the client to Consultix for implementation purpose. This procedure is initiated individually by the customer, does not belong to the standard scope of ProCampaign and therefore does not form part of the audit subject.

- Optional at the customer's request: Name check and correction

When a new profile is created in the database, an automatic name check is performed, if necessary. As soon as the name is changed, this automatic name check is performed again. This name check is done against a database consisting of first names. Then a gender and salutation check is carried out based on the result. In addition, the spelling is also corrected. This is done without an export of data. The comparison database was generated by Consultix itself. The data will only be corrected if there is a guarantee of more than 90 % that there is an error.

- Data selection

This function allows the user to address offline or online mailings targeted to specific target groups. These target groups are selected from the database, based on specific criteria.

- ProComplaint

ProComplaint allows limited database access to consumer data through a call center. In the case of consumer enquiries, the call centre agents can provide information on the basis of the transactions listed (e.g. requests for campaign participations.) Furthermore, ProComplaint is able to edit stored data of ProCampaign, since the same database is used. It is also possible, at

the request of a consumer, to provide his personal data. If a consumer insists on information about all data stored about him, the request will be forwarded to Consultix GmbH and processed there by sending a complete profile excerpt of ProCampaign. A deletion of consumer data is possible, too. For that purpose, the call center employee is able to use the "delete Profile"-button, which starts the previously described deletion process. The process of the identification/verification of a consumer by the agent is defined by the respective customer and cannot be supported by ProComplaint.

- Surveys.

ProCampaign offers the possibility to define dynamic forms for consumer surveys on websites. For this purpose, there is a form generation function, where the customer is able to define optional and obligatory templates, like first name, surname, e-mail address, gender and so on. The data submitted by the consumer is stored in the function attributes. The term "estimated acceptance" used for this is related to the dynamic nature of the questions. Forms can be constructed in a way that some fields do not appear or only appear later. The "Estimated Acceptance" is used to prioritize data fields in the survey form. The customer defines the priorities for each question and specifies the priorities based on a percentage or a self-defined evaluation scale. Based on that priority scheme there will be a decision, whether a question should appear or not and, furthermore, the order is subsequently determined. Consequently, the function of "Estimated Acceptance" is not a person-related data, but merely a value for determining the order of fields.

- Messaging

Messaging (formerly „E-Mailings“) now means sending e-mails and SMS/MMS to consumers; sending by SMS works just like sending an e-mail. The only difference is that the provider must provide the desired SMS/MMS provider via which the SMS/MMS is sent. Consultix GmbH. transmits the

sender number (alphanumeric, usually the customer's name), the recipient's destination number and the SMS text via an interface via https to the provider / provider specified by the user / customer. ProCampaign supplies only the data for SMS messaging to the provider. The actual telecommunication takes place via the provider specified by the user / customer and is not subject to the evaluation.

- Messenger Services

Via a new interface, messenger services can now also be integrated into the user's communication with the consumer. The consumer initially contacts the user in a request. ProCampaign then responds with messages to the consumer. Communication always comes from the consumer. If the Messenger used in each case offers an interface for mass communication, the known double opt-in methodology is used.

- Multivariate Testing

ProCampaign makes it possible to carry out a multivariate test before sending an e-mail newsletter to a consumer. Different versions of the newsletter can be created and sent to small recipient circles. Afterwards, it is checked which variant had the best results at Clicks and Opens or at a particular transaction (e.g., taking part in a contest). "Clicks" means clicking a link in the newsletter, "Opens" means downloading pixels in pictures in newsletters. The tracking is independent of the IP address of the consumer. No cookies are set directly via ProCampaign. As a result of that study, the remaining consumers on the recipient list receive the best variant. The best variant can be selected manually (by customer) or automatically (by ProCampaign). For the purpose of forming the sample, a subset of data with uniform distribution is taken from the entire database. The profiles are not selected based on personal data, but on mathematical calculations (method: "cluster sampling"). The cluster sampling is a mathematical procedure for

random selection. It does not depend on the individual consumer, but on all consumer profiles, which are combined in a "cluster". The results of this test do not allow any inferences that can be related to individuals, but only statistical values that serve to illustrate the selection of the best newsletter variant.

- Best Send Time Optimization

This feature allows you to send e-mails for each consumer at a specific, optimal time. The best time is calculated from the timepoints of the consumers' clicks and opens in previous messages.

- Link Tagging

The function allows categorizing links by tags. This categorization allows an aggregated view of the data. The tags can be viewed for evaluation purposes in the course of time and can be used subsequently for targeted advertising of the consumers.

- Statistics

In the statistics section, the user has access to aggregated consumer data. Here it is possible to look at statistics over time (e.g., registrations for a newsletter in a given month, participation in a contest). This feature allows certain general and non-personally identifiable indicators to be used to create the statistics. A graphical overview of the number of all applicable profiles and e-mails over time is then made. The evaluations in this section of statistics are therefore not directly attributable to a natural person. However, it is possible to use statistics, e.g. to look at a specific contest and then select the data of the participants from ProCampaign via the edit mask for this particular contest. In this respect, there is no anonymized evaluation.

- Direct Query

This functionality enables customers of Consultix GmbH. to perform limited database queries. These SQL queries are restricted to e-mailings for the Open and Clicks, for coupon campaigns for the redemption of the coupons and for transactions (for example, winnings) for the participation. In addition, only SQL queries can be queried about age, number of children in the household, gender and household size. As a result of the query, in which a maximum of 1,000 profiles can be included, a number is displayed, but not the profile of a consumer. This number is a so-called "count" and represents the number of results of a direct query with the executed parameters. In Direct Query, there is therefore no access to the personal data of an individual consumer. It is also not possible to draw conclusions using the "Entity_ID" issued for the consumer profile. The "Entity_ID" is an internal ID and can not be used in the profile search. Theoretically, it is possible that an authorized user delimits the search using specified parameters in such a way that only one or a few counts are displayed. Provided that this user has a system wide authorization to access individual profiles, the user now uses a transaction number to search for the relevant profiles in the database. Since only data is evaluated for which the user has obtained the consent of the consumer, for which the searcher has been assigned an authorization and the user must check and maintain the authorization concept, this is not critical. The user is sensitized by organizational measures (for example by an operating instruction) to counteract the misuse of the Direct Query function and to regularly monitor the query logs.

- Couponing

ProCampaign allows to define couponing activities for consumers. For example, Certain coupons may be assigned to a particular consumer profile group (e.g., coupons for T-shirts for men and women). The criteria for a

consumer segment as well as the discount applicable for this segment are defined by the user. All customer-defined attributes and behaviour related data are available for this purpose. Via an API interface, couponing can also be used to communicate with the user's system account (for example, a cashier system, shop system). In this case, the underlying system must manage the user permissions and log all transactions in such a way that the user is kept with a time stamp, since this is then financially relevant for the billing (of the cash register or shop system). The connected system, however, is no longer the subject of certification.

- API interface:

An API interface can be used to communicate with the user's system account (e.g. POS system, shop system) during couponing. In this case, the underlying system must manage the user authorisations and log all activities in such a way that the user is recorded with a time stamp, as this is relevant for the financial accounting purposes (of the POS or shop system). As a result of a new feature, product and order data can now be integrated. However, the connected logging-system is not part of the ToE. The user is adequately sensitized to the logging via this interface. The ProCampaign Consumer API was extended to store the consent texts so that all texts with the respective versions can be stored as a history. ProCampaign also has a new function that data can be made available via customized API, e.g. product information, sent messages (feed), etc. However, no personal data is extracted and made available, but only object-related data (feeds, product information).

- Geolocalisation

ProCampaign offers the possibility to create a regional selection based on the zip code, which is called "geolocation". The following sub-functions are possible:

- The postcode shows all consumer profiles that are eligible and approved for a marketing campaign. Postal codes can also be used to determine most frequently postal codes - based on existing and released profiles in ProCampaign.
- Based on the postal code and a radius selected by the user of a maximum of 20km, existing and released consumer profiles can be displayed.
- ProCampaign can display existing consumer profiles that have been approved for this purpose using the postal code, a user-selected radius of a maximum of 20km and a location (e.g. a business).

It should be emphasized that ProCampaign does not use the term "geolocation" as a geolocation in the data protection sense. It is not recorded where the consumer is located or whether he has visited a shop or bought something there. Instead, postal code, radius and shop coordinates are used to enable a selection of consumer data from the user in order to provide targeted information (advertising) to these selected consumers.

- Ratings & Reviews

This function is used to administer and moderate the process of product evaluations by consumers. Users can evaluate or comment on consumer products online and submit assessment reports. The ratings and reviews can also be answered, evaluated or graded. A moderator controls which ratings and reviews are published. For this purpose, content can also be set to "Inappropriate" by means of a flag. Usernames as well as certain words of the contribution can be blocked on a Blacklist. The Ratings & Reviews module consists of a front-end (JavaScript plugin snippets) for the visualization of the functions and results, a REST API as interface, process logic, configuration possibilities and the database with export / import function. ProCampaign's

well-known role and authorization model allows authors, moderators, and administrators to be assigned detailed permissions and roles.

Furthermore, a notification function can be set up via e-mail, which informs about new ratings or reviews or changes. The reviews and ratings are collected by the consumer via the respective web form of the user with his informed and at any time revocable consent in ProCampaign and published after verification by the user on the web portal. It is also possible that the consumer, who has already submitted a review or rating, will be informed later by e-mail about other products (e.g., requesting them to be tested and evaluated). The double opt-in method known in ProCampaign is used here.

The consumer must be informed about the concrete use of the data and his / her right of objection. It should also be noted that publication of the evaluations by the consumer is anonymous or at least possible under a pseudonym. In addition, the publication of the assessment should be made subject to the recognition of conditions of use, in which binding rules are made to ensure compliance with the applicable laws and regulations. The publication of content which is harmful to children is to be excluded. When using the Ratings & Reviews function, contributions made in free text must therefore be checked for legal conformity before publication, which is done by the moderator.

- OAuth2-Interface

ProCampaign offers an authentication interface based on OAuth2 as an alternative to the previous procedure via user name and password, with the aid of which customers of ProCampaign can implement an alternative authentication. The previous method is the default setting for the logon. When using this interface, consumers can log on to the system they want to authenticate using another authentication system. For example, In ProCampaign a consumer account is stored on a company portal, the

consumer can now also register with the authentication at a corresponding online shop. If this function is to be used, the consumer must be informed about the transfer of his data to third parties as well as his / her right of objection and his / her rights as a concerned person and consent to the processing of the data must be obtained. In addition, the consumer must be informed about the controller of the data processing and the related IT security risks. The information on which data are to be exchanged and which information the other body receives through the login, as well as the declaration of consent must be integrated accordingly before a login. An indication is also required in the data protection declaration on the websites. According to German Telemedia law, it is also necessary to make use of an anonymous or pseudonym.

The range of the standard version also includes the IT-based service of Consultix GmbH. on behalf of the user, in particular hosting ProCampaign.

- Optional at the customer's request: Own Definition of the Double-Opt-In Workflow

As already described, ProCampaign has a Double-Opt-In schedule for the subscription to a newsletter. The customer is able to define a workflow that differs from the standard one. At the same time, the legal requirements for the double opt-in must be complied with. In addition, ProCampaign supports the planning and implementation of CRM projects, the direct integration of websites, e-newsletters or SMS, the integration of certain promotions (coupons, lotteries), the integration of call centers via ProComplaint or quality control, whereby no personal data is collected.

However, data proceedings by the user of ProCampaign, all services of Consultix GmbH beyond the IT service ProCampaign, the deployment environment at the user's site, consumers and fulfillment partners as well as the billing processes between Consultix GmbH and the user do not belong to

the functional scope of ProCampaign. The media that can be integrated via ProCampaign (especially websites, call centers) of the user are also not subject of the evaluation.

7.3 Functions outside the standard

ProCampaign can be extended on request with optional features that are outside of the evaluation. Optional features of ProCampaign that do not belong to the standard scope are:

- Postal address- and name-check and correction;
- Postal address check after moving;
- determination of the "most valuable consumer";
- the integration of the provider with the new SMS dispatch and its IT environment;
- Likewise, the functions of a workflow management for Double-Opt-In e-mailing, newly introduced with version 7.0 of ProCampaign, are not part of the standard scope provided that the user configures them differently for his purposes;
- The enrichment of ProCampaign with external data, i.e. data collected outside ProCampaign, is not part of the evaluation. In particular, the external mosaic data which can be used for couponing are not subject to evaluation;
- Consultix offers its customers Java Script Snippets to address the API within Ratings & Reviews. These represent only an offer to the customer and are neither obligatory to use nor belong to the certified scope of the ToE;
- investigation and clarification of violations of the relevant terms and conditions of the customer in the context of illicit multiple registrations or by voucher / coupon fraud;

- Data processing at the user of ProCampaign, provision of services other than ProCampaign by Consultix GmbH., the environment for the user, consumer, and fulfilment partner, as well as the accounting processes between Consultix GmbH. and the users are not part of the scope of the audited version of ProCampaign.
- Also, the user's media interfaced via ProCampaign are not subject of the basic product and therefore not target of evaluation (in particular websites, call centre of the user).

8. Transnational issues:

Since ProCampaign is a web based application it can be used worldwide. The majority of companies deploying ProCampaign at present are domiciled in Germany. Some, though, deploy ProCampaign at their branches within the European Union, the EEA or worldwide. ProCampaign Systems and Server are located in the data centre of Consultix GmbH. within the Federal Republic of Germany.

9. Tools used by the manufacturer of the IT product / provider of the IT-based service:

Concerning ProCampaign, all IT systems are controlled by monitoring tools which inform the administration about irregularities. All actions on IT systems are logged revision-proof. "WhatsUp Gold" allows for controlling of hardware (CPU-load, hard disk capacity, capacity of random access memory) and server services. The bandwidth on routes is monitored by Cacti. Therefore, two additional monitors have been installed in the administration rooms. "Tipping Point" controls the incoming network packages for purposes of network attack identification. "Netflow" is carried out for billing purposes, based on socket layer access recorded on the firewall. Additionally, "Syslog" has been installed on all

router and Unix systems. By means of these packages of monitoring tools, security of all data is assured on a very high level.

10. Edition of EuroPriSe Criteria used for the evaluation:

The experts used EuroPriSe Criteria Catalogue, version January 2017.

11. Modifications / Amendments of the IT product or IT-based service since the last (re)certification

- Messenger Service
- Function of registration via mobile phone number
- Communication through MMS

12. Changes in the legal and/or technical situation

- New function for the data display (e.g., Product, Messages) via a customized API
- ProCampaign was further developed in conformity with the GDPR.

13. Evaluation results:

The following notable results could be found within the framework of the audit:

Implementation of legal requirements

The technical solutions used by ProCampaign innovatively enable the implementation of the legislative requirements. The collection of data by means of ProCampaign is determined only by the respective user. The data collected in ProCampaign is used in particular for directly addressing the consumer for advertising purposes and the assessment of statistical evaluation. ProCampaign is thus designed to promote the permission marketing, i.e. the consumer data is basically saved and as a result of the submission of a declaration of consent in ProCampaign processed. The implementation of data protection requirements is

regularly checked and evaluated in particular by the data protection concept developed for ProCampaign with regard to practical use by the user. The user is sensitized to the observance of the legal requirements for data collection and data use via the information sheet described.

Data avoidance

In addition, ProCampaign provides functions to avoid or minimise processing of personal information, such as:

- the use of pseudonyms in consumer registration,
- anonymous analysis,
- a detailed concept for deletion, blocking or cleaning of consumer data and
- a differentiated authorization concept; access to personal data within the system of ProCampaign can thus be limited to need-to-know-basis.

The user is explicitly pointed towards the principles of data avoidance and data minimization by the information sheet and is asked to comply with them for the individual establishment and use of the system.

Data security

It should be emphasized that Consultix GmbH has an information security management system for the scope "Data Center Services, Software & Website Development, Customer Relationship Management & Marketing Services", which has been certified according to ISO/IEC 27001:2015. The scope, which is audited by independent and expert auditors, is identical to the ToE of ProCampaign 8.0 examined here. The servers are operated in a data center with strong access and access controls. All data transfers with ProCampaign are encrypted. In addition, the data is adequately secured via a backup concept. The legal storage periods of certain tax and commercial law relevant data can be

guaranteed through the backup concept. The Consultix GmbH is committed to review this concept within the validity of the certification in terms of the principles of necessity, data avoidance / economy and adapt if necessary.

Implementation of consumers' rights

ProComplaint enables consumers to exercise their right of access via the integrated call centre. In addition, consumers may also ask for correction and deletion. Also, adherence of consumers' rights is promoted by pointing out the implementation in the leaflet to the user.

14. Data flow:

The following graphic describes the data flow of ProCampaign:

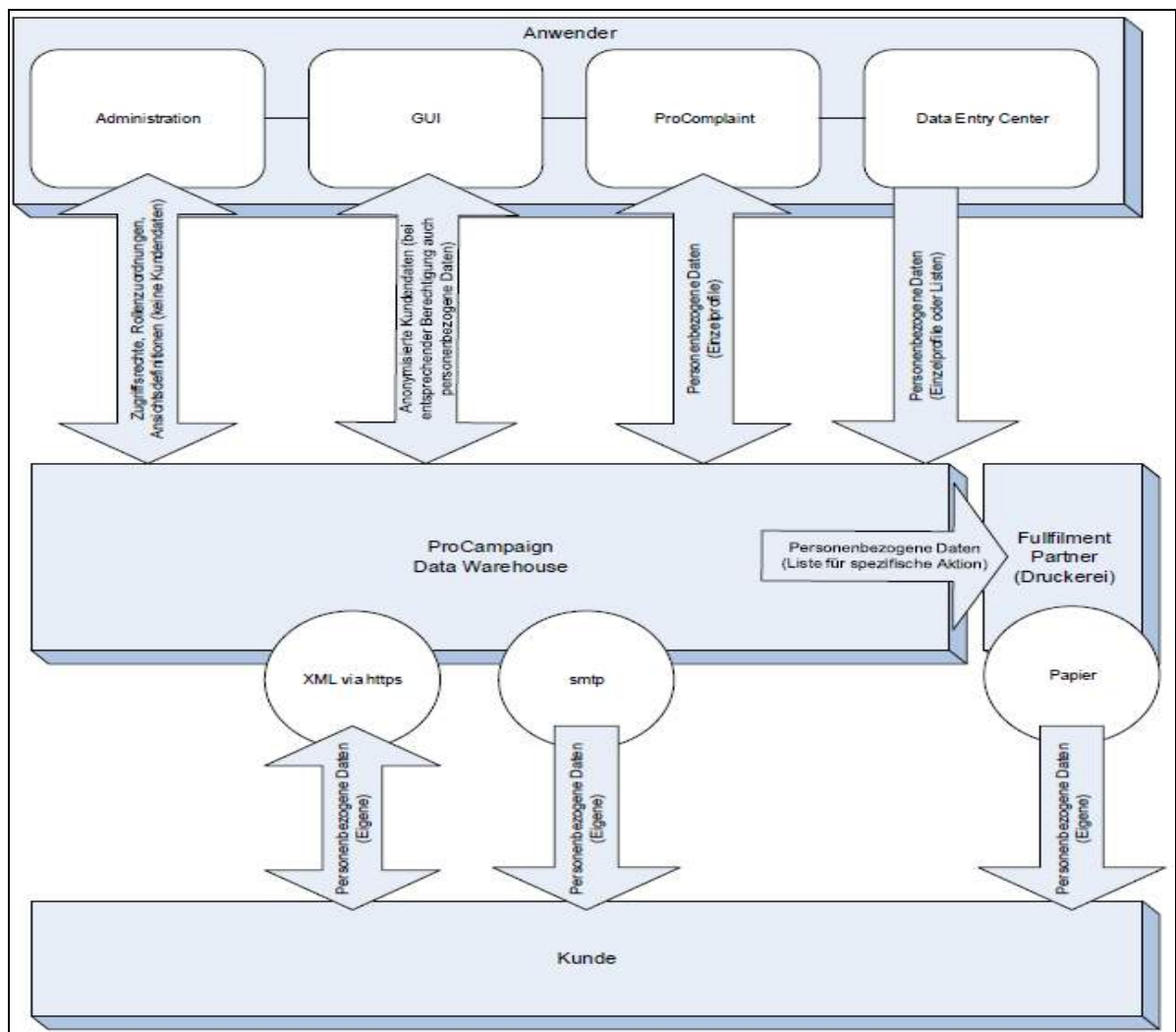


Figure 2: data flow

15. Privacy enhancing functionalities:

ProCampaign contains the following privacy enhancing functionalities:

- Data confidentiality is assured by the authorization concept which allows differentiated access rights;
- The description of the product and information of data processing are transparent and reasonably completed by individual training;
- ProCampaign has a blacklist to store anonymous dissents in data processing by filing hash codes;
- High level of physical security through exemplary data center equipment;
- Organizational and technical measures for granting data security and privacy are above legal standard;
- Consultix raises the user's awareness for privacy compliance in an exemplary way;
- A high availability of data is made possible by a multilevel backup concept and redundancy of infrastructure.

16. Issues demanding special user attention:

The evaluation did not rate any of the issues as "additional safeguards needed". Nevertheless, the privacy compliant use of ProCampaign lies within the responsibility of the user. He must adopt the given information by the developer about privacy standards and privacy enhancing configuration of ProCampaign.

17. Compensation of weaknesses:

Since ProCampaign does not pass any requirement with the grade "barely passing", there is no need to compensate a shortcoming.

18. Decision table on relevant requirements:

<i>EuroPriSe Requirement</i>	<i>Decision</i>	<i>Remarks</i>
Data Avoidance and Minimisation	adequate	ProCampaign allows collecting different data of consumers; data avoidance and data minimisation lies in the responsibility of the user; nevertheless, ProCampaign allows anonymisation of transactions concerning consumer data. It also allows the user to delete consumer data and secondary data such as log files within a short, sufficient time.
Transparency	excellent	Documentation and fact sheets on behalf of compliance and privacy are informative, up-to date and understandable; the processor also provides information for risk assessment, security policies and a privacy concept.
Technical-Organisational Measures	excellent	Organizational and technical measures on data security and privacy are above legal standard. The self-owned data center of the processor is located in Bremen, Germany and complies with all standards in regard to physical access control, recovery mechanism, network and transport security on a high level. The IT infrastructure is well-documented; a security policy is in place. Employees are well trained on privacy and data security matters.
Data Subjects' Rights	adequate	ProComplaint provides a feature that allows users to react on consumer questions or objections to data processing; data Subjects can easily declare an opt-in or an opt-out dependent on their choice; also, the data processor is sensitizing the user to implement data subject's rights.

Experts' Statement

We affirm that the above-named IT product / IT-based service has been evaluated according to the EuroPriSe Criteria, Rules and Principles and that the findings as described above are the result of this evaluation.

Bremen, 2019-01-07 Dr. Irene Karper LL.M.Eur.



Place, date

Name of Legal Expert

Signature of Legal Expert

Bremen, 2018-06-26 Alexey Testsov



Place, date

Name of Technical Expert

Signature of Technical Expert

Recertification Result

The above-named IT product / IT-based service passed the EuroPriSe evaluation.

It is certified that the above-named IT product / IT-based service facilitates the use of that product or service in a way compliant with European regulations on privacy and data protection.

Bonn, 14.02.2019

EuroPriSe GmbH

Place, Date

Name of Certification Body

Signature