



## Iberemec CRM Short Public Report

Application No. ULD080014p

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

Iberemec Customer Relationship Management System: “**Iberemec CRM**”

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

Company Name: Iberemec, S.A.

Address: Ed. Iberemec, Polígono Lanbarren, 20180 Oiartzun, Gipuzkoa (Spain)

Contact Person: D. Igor Mansoa Hijarrubia (Deputy Director & Information Systems Manager)

**3. Time frame of evaluation:**

From 2008 April to 2009 July

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

Technical Expert: Luis Alfaro (Sigacus Gestión, S.L.)

Address: Plaza Azkoitia, 5, 2D - 20011 Donostia-San Sebastián (Spain)

Legal Expert: Santiago Alfaro (Sigacus Gestión, S.L.)

Address: Plaza Azkoitia, 5, 2D - 20011 Donostia-San Sebastián (Spain)

## 5. Certification Body:

Unabhaengiges Landeszentrum fuer Datenschutz Schleswig-Holstein  
Holstenstraße 98  
24103 Kiel

Tel +49-431-988-1283, Fax -1223  
<http://www.datenschutzzentrum.de>  
[www.european-privacy-seal.eu](http://www.european-privacy-seal.eu)

## 6. Specification of Target of Evaluation (ToE):

The Target of Evaluation is called “**Iberemec CRM**”.

The Target of Evaluation is the online service, provided by Iberemec to previously registered customers. It involves:

- >> accessing the online service
- >> purchasing products
- >> consulting and checking information about
  - address and payment conditions data
  - pending offers
  - pending orders
  - delivery notes
  - invoices
  - fares and prices
- >> system administration and hosting by Iberemec

The online service interfaces accessed by users while using Iberemec CRM online services is the main object of the target of evaluation. The online private area for customers is limited to purchasing products and checking data. Accessing Iberemec CRM (log in) is also part of the ToE.

The Target of Evaluation does **not include**:

- Iberemec CRM background and ERP background by CTI Soft, S.L. (this company's role is evaluated as a contracted processor)

- iberemec web site's public areas
- Transmission via third-party networks like internet
- Users' hardware and software

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

Iberemec is an **air conditioning** and **heating systems** company that retails and wholesales markets its products and its consumer goods.

The Iberemec web site has a public area, which offers general information about the company and its products, which is not included in the target of evaluation. The target of evaluation is the web site's **private area** to facilitate communication with clients (Clients Module). Iberemec offers a wide service to its customers requiring the minimum of necessary personal data. After registration, the private area gives the Iberemec customer access to the following **sections** and offers the following options:

1. Identification data (customer enters username and password, customer can check address data)
2. Special offers
3. Orders (customer can check purchases and can order new products)
4. Delivery Notes (customer can check pending offers, pending orders, delivery notes)
5. Invoices (customer can check pending invoices and previous invoices)
6. Rates (customer can check fares and prices)

## 8. Transnational issues:

All data processing takes place in a Spanish data centre. Iberemec focuses on Spanish clients and the service is only offered in Spain.

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

Microsoft Windows Server 2003 R2

ERP-Spyro version 7i Rev.56/01/043  
Oracle DataBase 10g Release 10.2.0.1.0  
Real VNC 4  
Acronis True Image Echo Server (Build 8.018)

## 10. Version of EuroPriSe Criteria for Experts used for the evaluation:

Europrise Criteria Catalogue for Experts -Version 0.3

## 11. Evaluation results:

**Iberemec CRM** online service is offered to customers through the Iberemec web site private area. This service intends to be a meeting place for the company and its final customers. It tries to offer maximum available technical and administrative information to final customers.

Access to the online platform is **voluntary** and is offered as an **additional** service for already established customers, an additional commercial channel for registered customers. Service is offered for free, there is no connection fee, neither charge for requesting access codes.

Platform usage is **restricted**. Only customers with a previous commercial relationship with Iberemec can request access to the online services. Therefore, users of the online service are customers of the company already. It is not possible to register as an online service user without previously contacting the company.

Iberemec's customers can only become online services users, including respective access and usage authorizations by accepting and signing the "**Customer Acceptance**" document.

The company sends this document by registered post to the customer. It establishes the conditions of usage of the online service, provides information on how to use it, provides information on personal data protection and contains user's username and password. A copy of "Customer Acceptance" must be signed by users and sent back to Iberemec.

Furthermore, Iberemec's employees are informed about data processing security regulations. All employees receive a "**Staff Information Document**" that informs about personal data processing security regulation and operators' obligations as well as about security levels, files containing personal data, measures, rules and procedures necessary to ensure different security levels,

staff general duties and obligations, security incidents notification and management procedure, test with real data, consequences of breaking security regulation, authorizations, internet using policy, responsibilities and e-mail using policy.

Iberemec CRM online service offers intuitive and user-friendly options. The system is easily understandable without previous knowledge. When users log in, they see an easily understandable menu.

To access Iberemec CRM customers need **identification** and **authentication** codes they receive when signing the Customer Acceptance Document.

Accessing and using Iberemec CRM involves processing of personal data. Iberemec requires the minimum of personal data necessary to carry out the service. Some of the operations that involve personal data processing are the following:

- Customers enter username and password
- Customers check addresses data
- Customers check payment conditions data
- Customers check pending offers, pending orders, delivery notes, pending invoices, previous invoices, fares and prices
- Customers purchase products

Personal data processed by Iberemec are both primary and secondary data.

Data the service processes (data of the data subject-customer, content data):

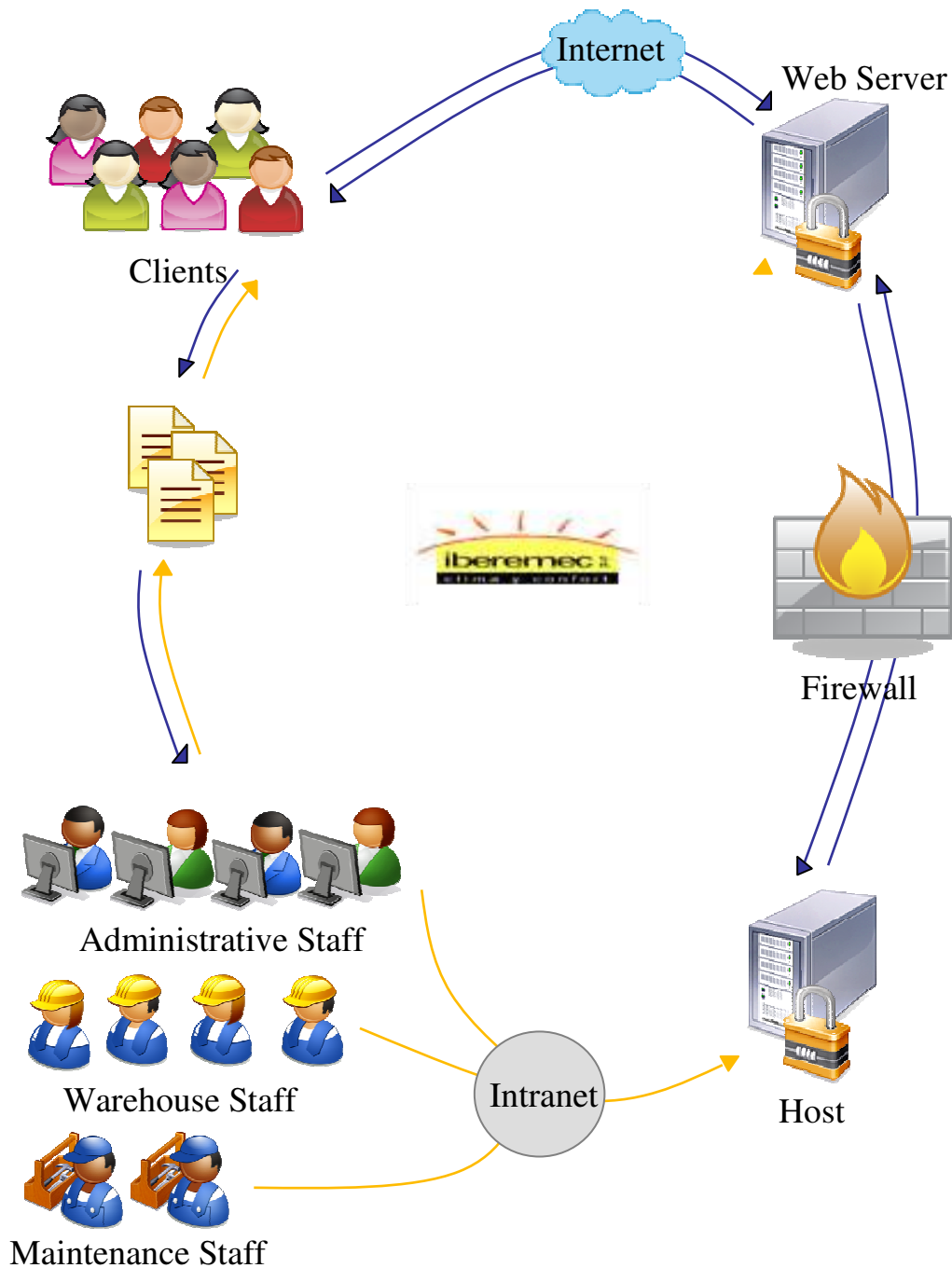
- identification data
- username & password
- purchasing products
- payment conditions
- other commerce-oriented data (offers, orders, delivery notes, invoices, fares, prices)
- Customers data: users' correct login (user and date)
- Customers or other people's data: system registers IP address when failed attempts of access

Iberemec CRM does not require or process high security level personal data. Collected data are just the necessary data to carry out the service.

Iberemec online CRM registers IP addresses in case of failed attempts of access. This tool can be useful to **prevent online fraud**. When users access correctly, their IP address is not registered. Iberemec does not use cookies.

## 12. Data flow:

### Data Flow Image



### 13. Privacy-enhancing functionalities:

The service enhances privacy by focusing on data avoidance and minimisation. The company is able to offer a wide commercial service processing only the strictly necessary personal data.

### 14. Issues demanding special user attention:

None.

### 15. Compensation of weaknesses:

- does not apply -

### 16. Decision table on relevant requirements:

<i><b>EuroPriSe Requirement</b></i>	<i><b>Decision</b></i>	<i><b>Remarks</b></i>
Data Avoidance and Minimisation	Excellent	The service takes care that personal identifiable information is collected, stored and used only to the extend necessary. Data for statistic purposes are anonymized. Cookies are not used.
Transparency	Adequate	The service offers comprehensive information within a Customer Acceptance Document as well as in a Legal Advice document and in the Privacy Policy. Customers using the ToE receive excellent support/information material in order to inform the user about the details of the service and the processing of personal data.
Technical-Organisational Measures	Adequate	Iberemec provides strong physical access control and a common security policy. It is assured that the state-of-the-art measures are in place to protect access to data.
Data Subjects' Rights	Adequate	Iberemec has established procedures and forms to manage the requests on this matter. Privacy Policy informs users about these rights. Cookies are not used.

## 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.

SAN SEBASTIAN  
2009-09-15

SANTIAGO ALFARO



Place, date

Name of Legal Expert

Signature of Legal Expert

SAN SEBASTIAN  
2009-09-15

LUIS ALFARO



Place, date

Name of Technical Expert

Signature of Technical Expert

## Certification 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 security.

Place, date

Name of Certification Body

Signature