

Short Public Report

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

The target of evaluation is a processor service called “Datenmigration hochsensibler Daten” (“Data Migration of highly sensitive data”) provided by HAVI Solutions GmbH & Co. KG (HAVI).

2. Provider of the IT-based service:

Company Name:

HAVI Solutions GmbH & Co. KG

Address:

Am Stadtrand 52

22047 Hamburg

Germany

Contact Person:

Jürgen Schröder

3. Time frame of evaluation

06.04.2017 - 06.04.2020

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

Name of the Legal Expert: Stephan Hansen-Oest

Address of the Legal Expert: Im Tal 10a
24939 Flensburg
Germany

Name of the Technical Expert: Andreas Bethke

Address of the Technical Expert: Papenbergallee 34
25548 Kellinghusen
Germany

5. Certification Body:

Name: EuroPriSe Certification Authority

Address: Joseph-Schumpeter-Allee 25
53227 Bonn
Germany

eMail: contact@european-privacy-seal.eu

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

The ToE contains

- the secure transmission of export data, for which HAVI provides an SFTP server;
- the migration environment (with the migration database, the objects, the actual mapping), which HAVI sets up in its infrastructure and for whose operation it is responsible;
- and the transmission of the import data for the target system via transfer medium or via the SFTP server managed and operated by HAVI.

Furthermore, the ToE contains automatic correction procedures (format adjustments etc.) and manual correction procedures (on the content level) to be performed by the customer, which are carried out before the import data is made available. For this purpose, HAVI provides tools and know-how if necessary.

The actual migration takes place exclusively at the customer's site, so that no personal data need to be transferred / disclosed to the service provider. Hereby, the customer makes use of scripts that HAVI develops or adapts during the project.

The ToE does not include manual corrections on the content level by HAVI employees (such corrections are only made if this is explicitly requested by the customer).

Furthermore, the customer's source and target systems **are not included in the ToE** and the same holds true for any data exchange via commercial data exchange platforms such as DropBox or similar (if requested by the customer). Finally, tools (scripts) that are created by HAVI during a project (customer specific) are not included in the ToE as such.

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

Data migration is the transfer of a dataset stored in a source system to a target system. The structure in which the data exists in the source system must be translated into the structure of the target system. The "data" consists of database contents and object data. The latter include "documents", "e-mails", "annotations" (document-related notes stored by users), "electronic signatures" and "encrypted data".

The database contents could be database entries, metadata (of the above-mentioned objects), master data, reference data from other systems, etc.

Data migration involves the transfer of the data stock from the source system to the target system by means of rules and specifications (so-called mapping).

Mapping is done manually so that the conversion process can be run automatically by the migration software later on.

The customer exports the data from the source system. He specifies the source and target structure. The service provider has no influence on the data that is made available to him. If the data is confidential or sensitive data in the form of documents, only a reference may be transferred to the service provider; if the sensitive data is contained in database fields, pseudonymised data (or encrypted data) or anonymised data can be transferred to the service provider instead, or simply the data structure. If necessary, the service provider provides support here with appropriate tools that are applied to the exported data stock before it leaves the customer's domain and is sent to the service provider. It is also possible that data fields containing personal data are modified after export

in such a way that it is not possible to assign them to an identifiable person. The contents of the data fields are not relevant for the service provider, since the contents are not (may not be) changed. The service provider therefore treats all data as strictly confidential and highly sensitive.

For the transfer of migrated data to the target system, a suitable interface of the system is set up or a program is used that is based on any existing and suitable API functions of the system.

The import into the target system does not take place within the migration environment, but directly in the target environment. The migrated and provided data must therefore be transferred to the target environment. This is done either by using a suitable transfer data carrier or a network connection. The system supplier or operator of the target system itself is usually responsible for the complete transfer of the data to the target system.

From a data protection point of view, the benefit of the target of evaluation is that HAVI, as a processor, does not need to know the contents of the data to be migrated if the customer does not want this. This will usually be the case if the data stock contains sensitive data, e.g. special categories of personal data or data that are subject to professional secrecy. In such a case, HAVI would only be informed of the data structure and, if necessary, be provided with sample data that is not real data or with anonymized or pseudonymized data. Customers of HAVI can choose between these options (as appropriate).

8. Transnational issues:

A processing of personal data outside Germany or the EU/EEA by the service provider is not intended.

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

- PCs with Linux – OS
- PCs with Windows - OS
- HAVI Media Control (Barcode capture for media management)
- HAVI-BackCheck (Checksum-Tool – Integrity-Check of migrated data)
- VeraCrypt (for creation of encrypted file-containers)
- Linux Text-Editors (for creation of scripts and logfile-view)
- SFTP-Server under Linux

10. Edition of EuroPriSe Criteria used for the evaluation:

EuroPriSe Criteria January 2017

EuroPriSe Commentary May 2017

11. Evaluation results:

Set 1: Overview on fundamental issues

The technology of the ToE is designed in a way that makes it possible to migrate (highly sensitive) personal data without transferring / disclosing the actual data to HAVI. For this purpose, users of the ToE may choose to transfer only data structures and test data that do not contain personal data to the service provider (rather than real data). HAVI presents the available options very transparently in the service description.

Set 2: Legitimacy of Data Processing

The target of evaluation facilitates the data protection-compliant migration of (highly sensitive) personal data.

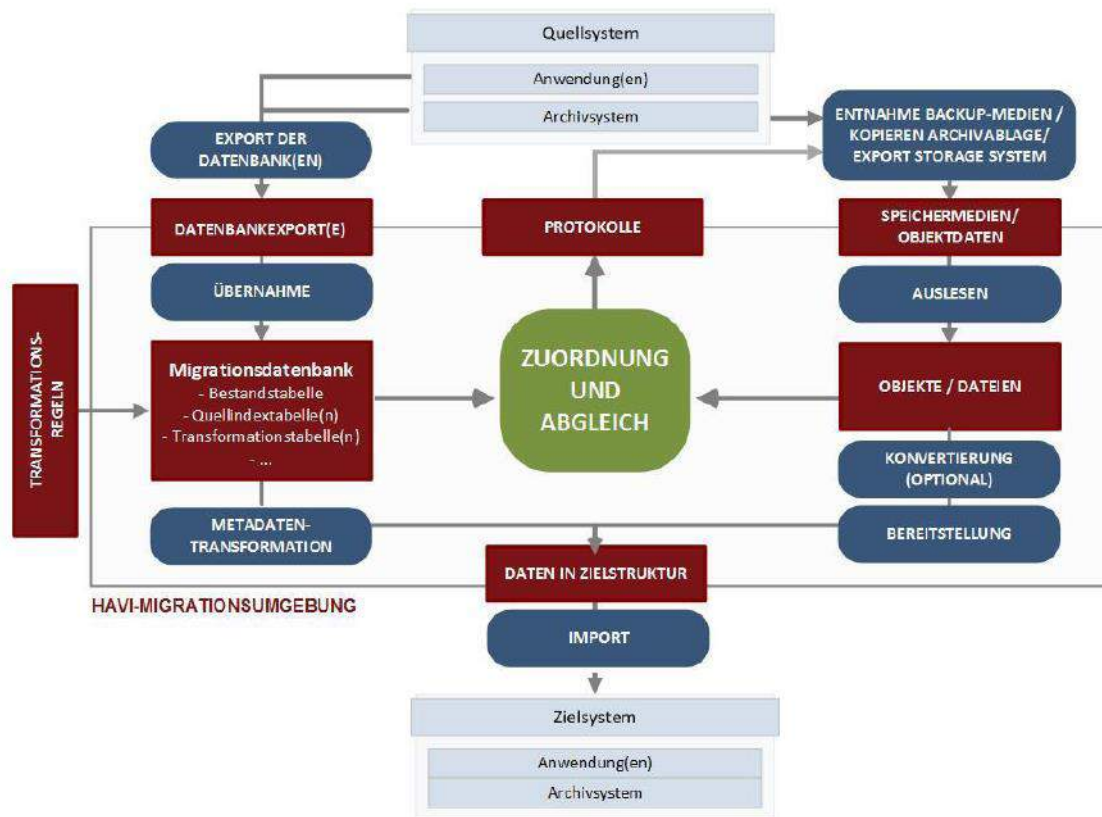
Set 3: Technical-Organisational Measures: Accompanying Measures for Protection of the Data Subject

HAVI has implemented extensive technical and organizational measures, which ensure an appropriate level of data security. This is supported by a successful certification according to ISO 27001.

Set 4: Data Subjects Rights

If personal data should be disclosed to HAVI, it acts as a processor, which is why it only has the obligation to assist the controller (customer) with responding to data subjects requests. HAVI has specified adequate procedures and instructed competent personnel accordingly to comply with this legal obligation.

12. Data flow:



13. Privacy-enhancing functionalities:

The use of the ToE is possible without the disclosure of any personal data to the service provider.

14. Issues demanding special user attention:

The ToE facilitates its data protection-compliant use. However, customers as controllers are responsible for the legitimacy of the processing of personal data during a migration project.

15. Compensation of weaknesses:

-not applicable-

16. Decision table on relevant requirements:

<i>EuroPriSe Requirement</i>	<i>Decision</i>	<i>Remarks</i>
Data Protection by Design and by Default	<i>excellent</i>	The technology of the ToE is designed in such a way that it is possible to migrate (highly sensitive) personal data without disclosing them to the service provider.
Transparency	<i>adequate</i>	HAVI describes clearly that two versions of the process/service are offered. One is the data migration for "highly sensitive data", where HAVI does not need to have access to this type of data, but instead may only create the migration scripts and work with pseudonyms, references, encrypted data, sample data or anonymized data.
Technical-Organisational Measures	<i>adequate</i>	The technical-organisational measures taken by the service provider are adequate.
Data Subjects' Rights	<i>adequate</i>	Since HAVI acts as a processor, HAVI only has the obligation to assist the controller. It ensures compliance with this legal obligation by respective procedures and instructions issued to competent personnel.

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.

Flensburg, 29.05.2020

Stephan Hansen-Oest



Place, Date

Name of Legal Expert

Signature of Legal Expert

Kellinghusen, 29.05.2020

Andreas Bethke



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 protection.

Place, Date

Name of Certification Authority

Signature