EuroPriSe European Privacy Seal

Short Public Report

Recertification No. 1

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

IT product: ProCampaign, version 7.0

IT-based service: ProCampaign, functional status: January 2017

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

Company Name: Consultix Ldt.

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

                  Web: https://www.consultix.net

Contact Person: Andres Dickehut, CEO Consultix Ldt.

3. **Time frame of evaluation:**

2014/01/02 – 2017/02/03

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

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5. **Certification Authority:**

Name: EuroPriSe Certification Authority

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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 Ldt. (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 Ldt. 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 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 or online registrations for closed user groups) 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.

In the European Union, provisions can be found in Directive 95/46/EC and its various forms in national law. The legal basis for data processing is stated in article 7 of the Directive 95/46/EC. As stated in article 7 lit. a) of the Directive, the basis for data processing can be a data subject´s consent, as defined in article 2 lit. h) of the Directive. It states, that the data subject's consent is any expression of will, which is carried out without coercion, specific and informed and with which the person concerned accepted processing of personal data that concern him.

In accordance with article 14 lit. b) of the Directive 95/46/EC, the data subject has the right to object to the processing of personal data for the purposes of direct marketing (Opt-Out). Characteristics of this regulation can be found in German law in articles 4, 4a and 28 of the Federal Data Protection Act (FDPA).

However, for the processing of personal data by email, telefax or automatic call systems, Article 13 of the Directive 2002/58/EC states an Opt-In as a restrictive regulation, which found entrance in the German law in article 7 of the Act Against Unfair Practices (AAUP).

According to German law, direct marketing by email, phone or short message service (SMS) always requires (in accordance with article 7 of the AAUP) an

explicit consent (opt-in), while advertising via mail according to the so called "list privilege" of article 28 FDPA therefore follows the opt-out principle for the possibility of objection.

For advertising or statistical analysis using electronic communication, special specifications are also pursuant to Directive 2002/58/EC. For example, the analysis of consumers' click behavior on web portals or through links to websites in newsletters as well as the forwarding of newsletters themselves are generally subject to consent (cf. article 13 of Directive 2002/58/EC and section 7 of the German AAUP). The stipulations of article 5 (3) of Directive 2002/58/EC must also be observed, if cookies are used, respectively if information is stored or retrieved on the end user's device.

These provisions have been inter alia substantiated by the declaration of the Article 29 Data Protection working Party (cf. Working Paper No. 148, p. 14 and Working Paper Nr. 159, p. 5, n. 7).

By means of ProCampaign, an opt-in or opt-out can be stored in the system depending on the communication channel and transaction and it can be taken into account for future marketing campaigns. 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 email to the specified address with a request to confirm the order by clicking on a link; he 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.

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.

It is to highlight that a data protection concept based on German law was developed for ProCampaign. In this concept, the admissibility of data processing under different legal aspects (e.g. FDPA, German Act Against Unfair Practices, German Telemedia Act) relating to practical use by the user was assessed and evaluated.

The data base of ProCampaign can also be separated for different user clients so that for each client a separate data collection and data usage can be established, e.g. in international companies. ProCampaign offers an exemplary differentiated roles and authorization concept for the access of the user to its data. This allows the user to grant always only the access needed for the respective roles.

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

- 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.

- 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

    With this function, consumer data can be excluded from actions, e.g. in case of a dissent in data processing for marketing purposes.

- Cleaning up data

If a newsletter cannot be delivered, 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. This period was reduced from 24 to 18 month with version 7.0) Since these profiles are found in statistics, a multi-level deletion of the data takes place. 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), 48 months later all transactions are deleted.

Offline returners (i.e., a mailing by mail has not arrived at the recipient) arrive at a separate list.
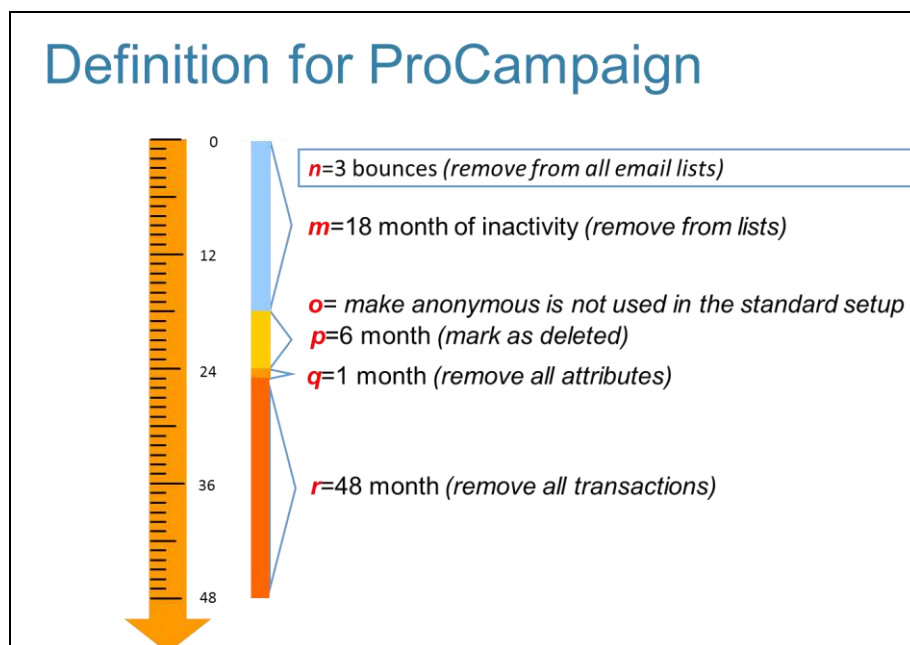

Abbildung 1: Cleanup-Prozess bei ProCampaign

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 Ldt. 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.

- 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 analyzes 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?".

- 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

  This is a form for complaints management, which the user runs in his own call center.

- Surveys (updated with v. 6.0)

  ProCampaign offers the possibility to define dynamic forms for consumer surveys on websites

- Messaging (ProCampaign v. 6.0)

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

- Multivariate Testing (ProCampaign v. 6.0)

  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. The tracking is independent of the IP address of the consumer. However, no cookies are set via ProCampaign.

- Best Send Time Optimization (ProCampaign v. 6.0)

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 (ProCampaign v. 6.0)

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 (ProCampaign v. 6.0)

In the Statistics section, it is possible to view statistics (e.g., registrations for a newsletter in a given month, participation in a contest). General indicators can be selected and displayed as graphics with aggregated data. The evaluations are therefore basically not personal. However, it is possible to create the person reference using other functions in ProCampaign.

- Direct Query (ProCampaign v. 6.0)

This functionality enables customers of Consultix Ldt. 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, sex and household size. Theoretically, it is possible that an authorized user delimits the search and, if he has access to individual profiles, has obtained a system-wide authorization, the corresponding profiles are searched out of the database using a transaction number. Since only data is evaluated for which the user has consented to the consumer for which the searcher has been assigned an authorization and the user has to check and maintain the authorization concept, this is uncritical.

- Couponing (ProCampaign v. 6.0 & 7)

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 behavior 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.

- Geolocalisation (ProCampaign v. 7.0)

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 (eg 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 (ProCampaign v. 7.0)

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-Schnittstelle (ProCampaign v. 7.0)

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 Ldt. on behalf of the user, in particular hosting ProCampaign.

7.3 Functions outside the approved 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";

- 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;

- own definition of Double-Opt-In process;

- the integration of the provider with the new SMS dispatch and its IT environment as of version 6.0 of ProCampaign.

- 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, ie 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.

Data processing at the user of ProCampaign, provision of services other than ProCampaign by Consultix Ldt., the environment for the user, consumer, and fulfilment partner, as well as the accounting processes between Consultix Ldt. 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 Ldt. 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 and badwidth on routes. Therefore, two additional monitors have been installed in the administration rooms. "Whatsup Gold" also 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 November 2011.

Note: Alongside the evaluation according to EuroPriSe, ProCampaign was also evaluated according to the standard of the privacy seal due to the federal state order of Schleswig-Holstein on a privacy seal.

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

All relevant changes are named above (see No. 7).

12. Changes in the legal and/or technical situation

There are no relevant changes.

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.

Therefore, ProCampaign provides the compliance with the provisions of article 13 of the Directive 2002/58/EC, article 7 AAUP also as article 14 lit. b) of the Directive 95/46/EC respectively article 28, section 4 FDPA.

Also, the implementation of legal requirements (for example, FDPA, German Act Against Unfair Practices, German Telemedia Act) is regularly being assessed and evaluated, in particular due to the data protection concept developed for ProCampaign with regard to the user's practical use.

By operating ProCampaign, no cookies are used; therefore the provisions of the European „Cookie Directive" do not directly apply. The described data protection leaflet however informs the user on the information requirements for the use of cookies, as well as on the requirements of the EU directives.

Therefore, the user is made aware of legal requirements for the data collection and use of data by the described information sheet on the fulfilment of the requirements in an exemplary way.

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

The servers are operated in a data center with strong admittance and access controls. All data transfers within the use of ProCampaign are secured via SSL (RSA-1024). Also, the data is backed up appropriately following a backup policy.

The statutory retention periods for certain data relevant to taxation and commerce law regulations can be guaranteed by the backup policy. The Consultix Ldt. is committed to review this concept within the validity of the certification with regard to the principles of necessity, data reduction and data minimization and adjust if necessary.

The Information Security Management System (ISMS) of Consultix Ldt. for the scope "Data Center Services, Software & Website Development, Customer Relationship Management & Marketing Services" also fulfills the requirements of the international standard ISO/IEC 27001:2013 and is certified by the certification body datenschutz cert Ldt.

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:**

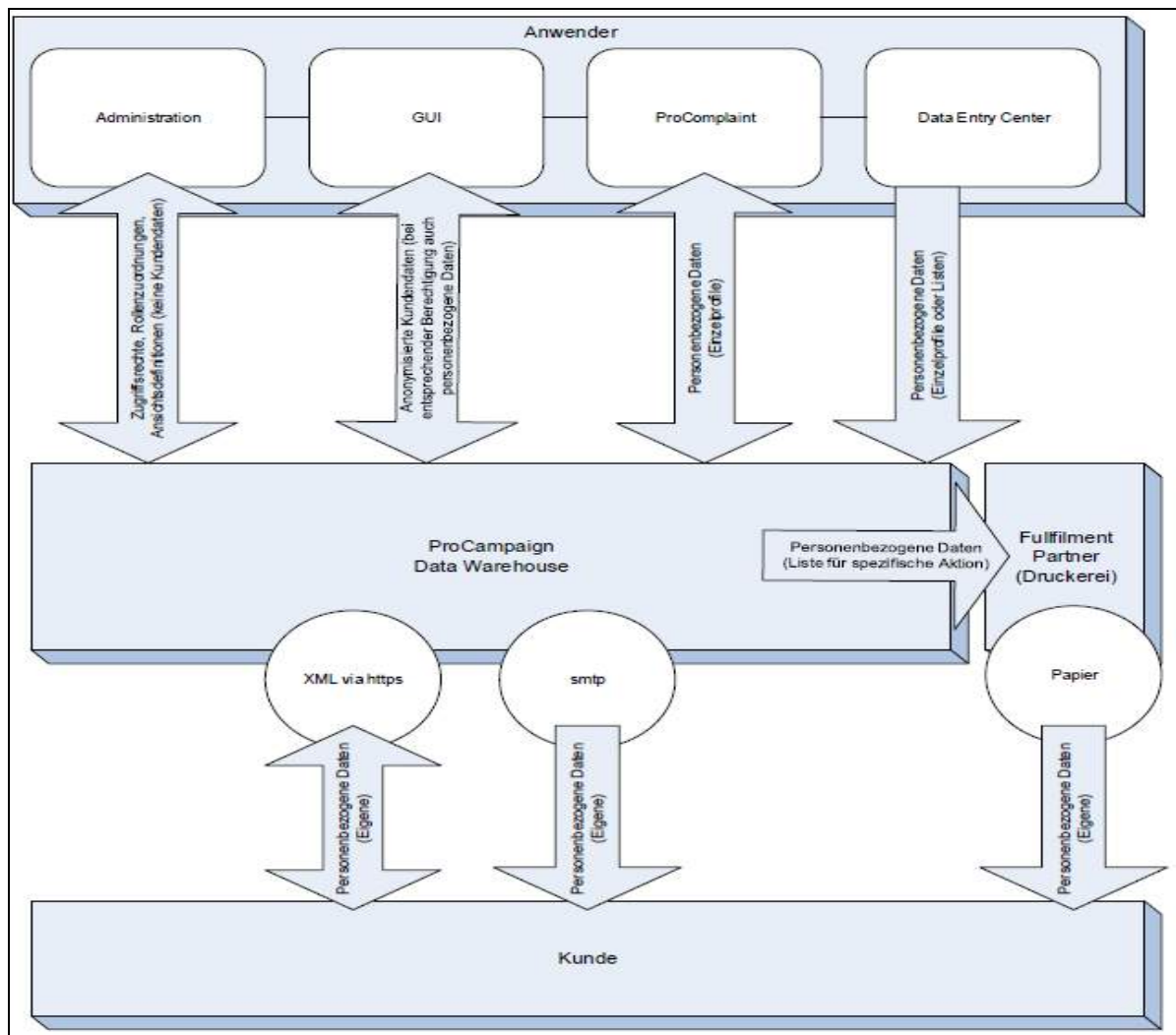The following graphic describes the data flow of ProCampaign:

Illustration 1: 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;

- 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:

EuroPriSe Requirement	Decision	Remarks
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, 2017-02-03   Dr. Irene Karper LLM.Eur.

Place, date   Name of Legal Expert   Signature of Legal Expert

Bremen, 2017-02-03   Ralf von Rahden

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,	EuroPriSe Ldt.	
Place, Date	Name of Certification Body	Signature