



Short Public Report

Recertification No. **EP-S-QZ6TVW**

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

IT product: ProCampaign, version 8.11

IT-based service: ProCampaign, functional status: December 2021

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

Company Name: Consultix Ltd.

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

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

Contact Person: Andres Dickehut, CEO Consultix Ltd.

3. Time frame of evaluation:

2021/01/02 – 2022-06-14

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

Name of the Legal and technical Expert: Dr. Irene Karper

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Mail: ikarper@datenschutz-cert.de

5. Certification Authority:

Name: EuroPriSe Certification Authority

Address: Joseph-Schumpeter-Allee 25

53227 Bonn

Germany

eMail: contact@euprivacyseal.com

6. Specification of Target of Evaluation (ToE):

ProCampaign is a multifunctional, web-based application to support Customer Relationship Management (CRM), which is developed by Consultix GmbH and hosted by it for customers (users). It is both an IT product (ProCampaign, version 8.11) and an IT-based service. The IT-based service was audited using the functional status as of December 2021.

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 Ltd. operates as the data processor of the IT-based service "ProCampaign".

7.1 Purpose and area of application

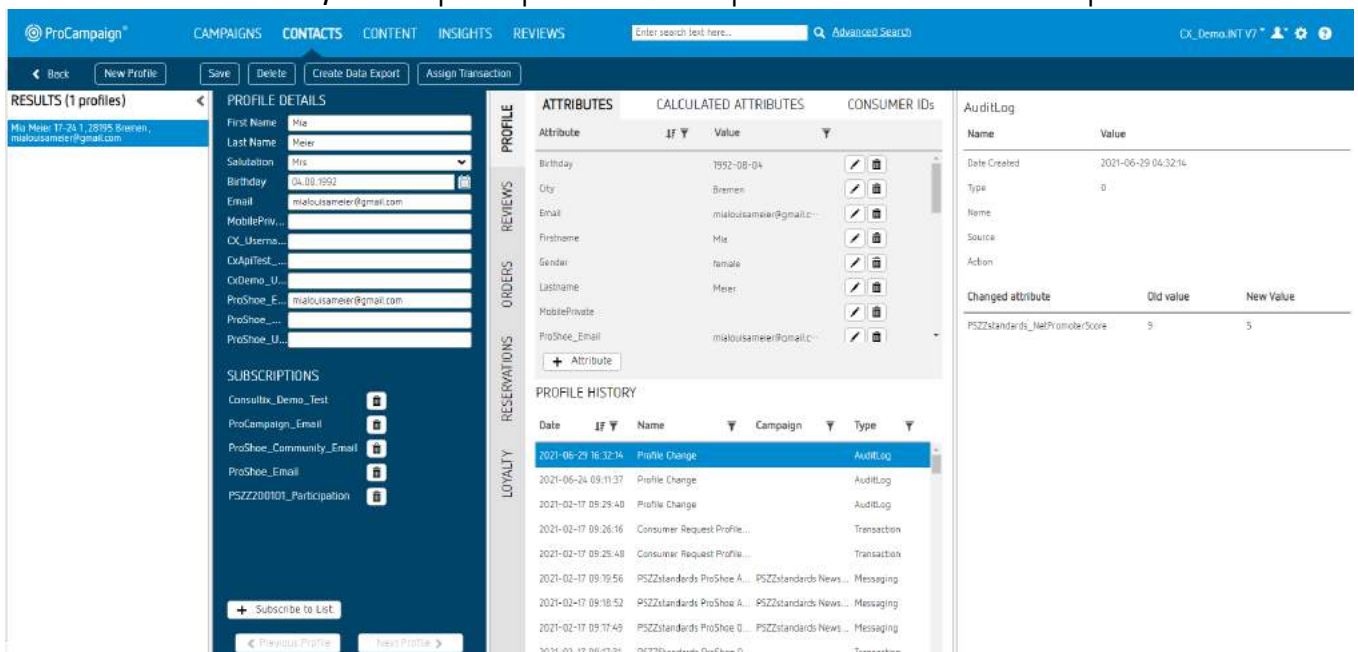
With ProCampaign data from consumers can be processed for market analyses, consumer loyalty measures or for optimizing marketing campaigns. ProCampaign enables the user to manage data that he receives via campaigns. He can transfer his own consumer data to ProCampaign or data is transferred to ProCampaign as part of participation in a campaign.

The assignment of unique **ConsumerIDs** facilitates the identification of persons and transactions. The IDs are generated and checked in the database. Each profile receives one ConsumerID per campaign. It is only valid for the campaign. A profile can have multiple ConsumerIDs.

The campaigns are created and managed in the **CAMPAIGNS** section. Workflows are stored here (e.g. sending a welcome e-mail after registration). A double opt-in process is set up in the standard. Furthermore, target groups are managed here (e.g. all subscribers of a newsletter for shoes) and data can be stored in a folder within the ProCampaign client.

Profile management takes place in the **CONTACTS** section. A consumer's data is stored in a profile. All existing information is linked to the profile. Attributes are

recorded for this purpose, e.g. master data, such as the first name, last name or e-mail address. In addition, the actions and events in the consumer's profile are marked via so-called transactions, such as participation in a sweepstakes or the time of the opt-in. The



The screenshot displays the ProCampaign interface for a consumer profile. The top navigation bar includes 'CAMPAIGNS', 'CONTACTS', 'CONTENT', 'INSIGHTS', and 'REVIEWS'. The main content area is divided into several sections:

- PROFILE DETAILS:** Fields for First Name (Mia), Last Name (Meier), Salutation (Mrs), Birthday (04.09.1992), Email (mia.louisa.meier@gmail.com), and Mobile Private.
- SUBSCRIPTIONS:** A list of subscription statuses for various channels like 'Consultix_Demo_Test', 'ProCampaign_Email', 'ProShoe_Community_Email', 'ProShoe_Email', and 'PSZZ20101_Participation'.
- ATTRIBUTES:** A table listing personal attributes such as Birthday, City (Bremen), Email, Firstname, Gender (female), Lastname, Mobile/Private, and ProShoe_Email.
- PROFILE HISTORY:** A table showing a sequence of events including 'Profile Change' and 'Consumer Request Profile...' with associated dates and campaign names.
- AuditLog:** A table on the right side showing 'Date Created' (2021-06-29 04:32:14), 'Type' (0), 'Name', 'Source', and 'Action'. It also includes a 'Changed attribute' table with 'Old value' and 'New Value' columns.

consent declarations and opt-ins of a profile are managed via permission lists.

Abb. 1: Profile Overview with Auditlog

Upstream, matching checks whether the profile already exists before it is stored as a new profile. Downstream **duplicate detection** enables existing profiles in the database to be recognized and subsequently cleaned up. The cleanup is done either "hard", by physically merging a detected duplicate with another profile, leaving only one profile left, or "soft", by merging the records. In this case, the duplicates' consent is withdrawn and they are deleted via the profile clean-up process (see below).

Permissions can be managed. Consumers who have given their consent receive an opt-in on a "permission list". If a consumer no longer wishes to be contacted, they receive an opt-out for this channel. Changes are traceable as transactions. Furthermore, the consent formulation ("legal text") is versioned and can be traced as history (e.g. for proof purposes).

ProCampaign offers the possibility to save **product purchases** and data (orders). They can be linked to a profile via the ConsumerID. If this data is available, then ProCampaign can be used, for example, to send the order confirmation by e-mail as part of an eCommerce process.

Points can be awarded and managed based on rules for purchases of a profile submitted in ProCampaign. For this purpose, the purchases and the points are stored in ProCampaign for a limited time. Points can expire, so the turnover of points must be saved. Both purchases and points turnover are subject to clean-up (see below).

ProCampaign can also be used by the hotel and event industry to process a guest's data for booking management and processing, e.g., to send the guest a reservation confirmation email. Clicking on the profile at "**Reservations**" lists the reservation data as well as other data of the guest for the reservation. These are: Date of arrival, departure, status, nights, property (= hotel object), optional data, guest data as well as food and beverage orders with prices, bookings for e.g. sauna visits etc.

The sub-area **Blacklist** is a filter separated by client, which is organized as a list. Here, e-mail addresses or even domains are listed that may not be contacted under any circumstances because the consumer has objected, for example. The reason for the objection or other personal or person-related data cannot be entered in the blacklist. In the case of entries in the blacklist, the consumer is henceforth excluded from actions via ProCampaign and his data is deleted - with the exception of the entry in the blacklist. This means that a very small amount of information about this consumer must still be available in the system (e-mail address, opt-out, time information), even if his profile has already been deleted. If the consumer subsequently wishes to receive an e-newsletter again, he must participate in the double opt-in procedure once more. After a successful double opt-in, the newsletter is removed from the blacklist.

In addition, profile data can be **exported or imported** via the GUI. All exports end up as password-encrypted ZIP files in this ProCampaign area and can be downloaded by the user. For exports, an approval process can also be activated at the user's request. Only approved exports are also executed.

A new feature is the "**One-Click-Profile Export**": Upon request of a concerned data subject, the user can create a password-encrypted file with all profile data in ProCampaign with one click. With this function, ProCampaign supports the implementation and exercise of the rights of the data subjects, e.g. to information and data portability.

In the **CONTENT** section, various **editors** are available for texts, content and templates for campaigns. Here, for example, e-mails or SMS/MMS or even websites for campaigns are created. New is the possibility to edit a self-service portal. The **self-service portal**, also known as the "Preference Center," is designed to enable consumers to independently edit settings for the use of their personal data in campaigns. For example, a consumer can correct or delete personal data there online, or give or revoke consent. The user can configure the Preference Center with the Site Editor in ProCampaign. If it is used, the data of the web forms - as with the "normal" websites of a user in ProCampaign - is transferred via an interface and saved with the consumer profile.

Surveys can also be edited in the subsection. ProCampaign offers the possibility to define dynamic forms for surveys on websites. Questions and sample attributes such as first name, last name, e-mail address can be defined as a field in an online form and prioritized (so-called "Estimated Acceptance"). The user sets the priorities for the individual questions. The value reflects the user's assessment of how far the consumer is likely to be willing to answer the question (e.g. 90% for question 1, 40% for question 2, etc.). Based on the stored values, the order of the data fields or questions is stored. This probability is determined based on all existing consumers, but not specifically for just one consumer. The function is therefore not a personal data, but only a value to determine an order of data fields.

Essential is the function of **Clicks & Opens**. Direct links to ProCampaign can be used to check whether an e-mail newsletter was actually opened. This tracking of user behavior is based on the so-called "clicks" and "opens". Clicks are the clicking of a link in the newsletter, opens are the downloading of counting pixels in images in newsletters. User behavior based on the "clicks" and "opens" is recorded using an encryption code in the newsletter link. This code contains information about which consumer is involved, which newsletter and which element was clicked on. The tracking of user behavior relates exclusively to the newsletter and is carried out independently of the IP address of the consumer. No cookies are set via ProCampaign. When the link in the newsletter is clicked, the user is redirected to the website. ProCampaign does not track the usage on the redirected website. It is possible to optionally switch off tracking for a profile.

The wish to switch off tracking is stored in the profile via an attribute. Then only the personalized delivery is tracked. There is a common statistic for all anonymous profiles.

The evaluation of clicks and opens can be used for the following functions:

- Multivariate Testing (newsletters with different variants as a test for content optimization),
- "Best Send Time Optimization" (optimal send time of an e-mail) or
- Link Tagging (categorization of links).

In the **INSIGHTS** section, data can be evaluated. There is a dashboard with graphical displays, selections, cross tables, statistics and a direct query. The **geolocation** function should be emphasized. Here, ProCampaign does not use the term in the data protection sense of geolocation. It does not record where the consumer is or whether he has already visited a store or bought something there. Rather, the zip code, radius and store coordinates are used to enable selection in order to send targeted information (advertising) to the consumers selected for this purpose. Example: Subscribers to the Shop123 newsletter receive information by e-mail about a store opening in Bremen Mitte if they live within a 10km radius of the store and have given their prior consent. The consumer will be informed about the use of his postal code for purposes of individualized advertising in the context of the respective data collection and consent will be obtained.

Furthermore, certain **consumers may be excluded**, e.g. when exercising the right to object / entry in the blacklist. This ensures that he or she is no longer contacted via this channel.

The **REVIEWS** function is used to administer and moderate the workflow of product ratings by consumers ("Ratings & Reviews"). Consumers can evaluate products (= objects) of the user online (= review) and submit evaluation grades (= ratings). The ratings and reviews can in turn be answered, evaluated or graded. Via ProCampaign, a user in the function of a moderator controls which ratings and reviews are published. For this purpose, inadmissible content can be set to "Inappropriate" via a flag. Usernames as well as certain words of the contribution can be blocked on a Blacklist.

In the **SETTINGS** area, settings are made to ProCampaign and the data processing. Here are also the permission lists about the consents.

Furthermore, a help page ("**HELP**") can be accessed via the dashboard. Here, the user has access to the user manual, training videos and the data protection leaflet, among other things.

ProCampaign also has a "**CONTACT CENTER**" (formerly ProComplaint), which is used to manage complaints as well as legal texts and contracts (e.g. sweepstake conditions). The CONTACT CENTER is used to process inquiries about data protection, objections to data processing, withdrawal of consent or complaints in the context of a transaction (e.g. against an offensive advertising campaign).

ProCampaign has an automatic data **cleansing process (Clean Up)** that continuously deletes profile data based on certain criteria, such as deleting profiles without consent). All profiles that do not have an opt-in for 6 months are marked as deleted. From that point on, they will no longer be available through the interface and interfaces. The period of 6 months for which the profiles are suspended without consent is a grace period to ensure the handling of campaigns and the traceability of their execution (e.g. a sweepstakes). Profiles do not have consent if they unsubscribe from all newsletter lists. If a newsletter cannot be delivered, this circumstance will be communicated back to ProCampaign by e-mail. Profiles who repeatedly fail to receive newsletters (i.e. 3 consecutive hard bounces) shall have their consent to receive an email automatically revoked.

Profiles that are inactive, i.e. for which no transactions (e.g. sweepstakes entry, newsletter response) have been reported for 18 months, shall have their consents revoked. A profile is inactive for a channel if it has had no activity - i.e. transaction - in the channel for 18 months.

Profiles that are under 16 years old will have their consents revoked. In this regard, Consultix recommends its customers not to collect personal data from children under the age of 16. If information society services are provided that are directed at children, consent from the child's 16th birthday can legitimize data processing (Art. 8 (1)

DSGVO). The personal data of persons under the age of 16 are therefore removed from the database accordingly via standard deletion routines.

1 month after a profile is marked as deleted, the personal attributes are removed. The deadline is 1 month to be able to prove the deletion of the profile. For internal evaluation purposes, transactions (e.g. participation in the competition) are kept for 24 months after a profile has been marked as deleted. A further 3 months later, the change logs for the profile are deleted. This ensures that the data is contained in two different backups and is always available for legal purposes in case of a damaged backup. What is new is that the change logs are no longer stored for only 1 month, but for 3 months, because otherwise there was a problem with the backups.

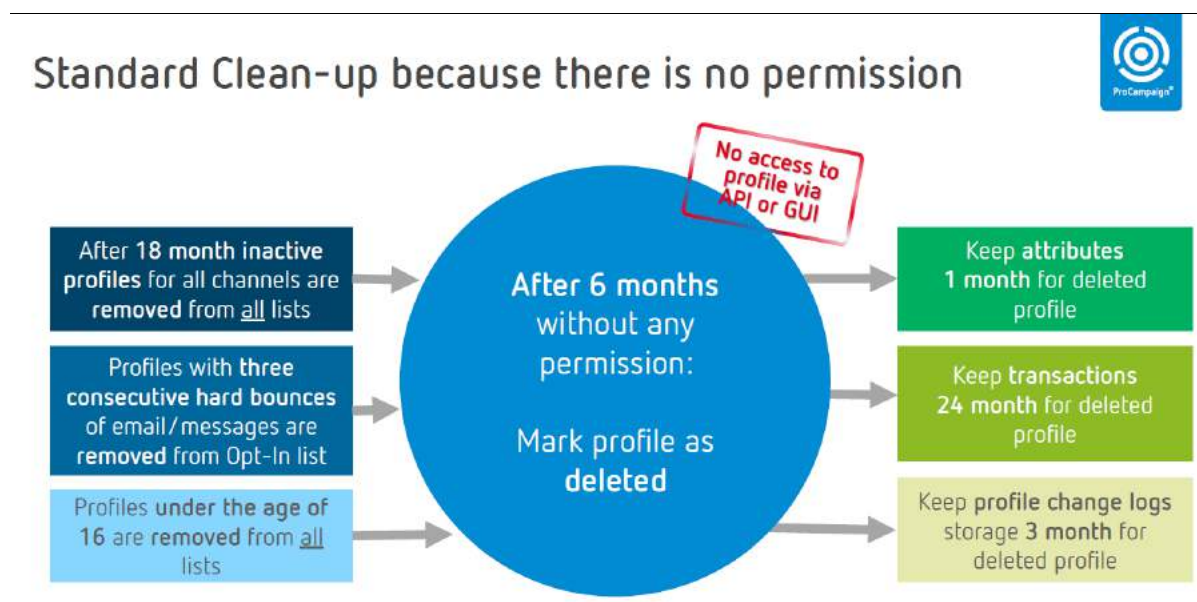


Figure 2: Cleanup process in the absence of consent in ProCampaign

7.2 Audited range of functions in the standard version

The ToE includes the database including the interfaces as well as the functions

- CAMPAIGNS
- CONTACTS
- CONTENT
- INSIGHTS
- REVIEWS and
- SETTINGS

- HELP.

In addition, the functions of the data cleansing, the CONTACT CENTER as well as the Single Sign On and OAuth2 authentication are to be mentioned. Furthermore, the ToE includes the data processing of Consultix GmbH on behalf of the user.

7.3 Functions outside the standard

The ToE does not include the following functions:

- Postal address check and correction
- Mover check for returns
- Determination of the "Most Valuable Consumer"
- Clarification of violations of participation conditions in the context of unauthorized multiple registrations or through voucher/coupon fraud
- Name check and correction
- Product recommendations
- RFM Analysis
- Shopware Plugin.

The ToE also does not include the integration of the provider for SMS dispatch and its IT environment.

In ProCampaign, only e-mail and SMS (MMS) are implemented as messenger services, which are therefore also covered by the ToE. Messenger services, such as those from whatsapp or other services, such as web push notifications, are not included in ProCampaign at the time of the audit and are also not covered by the ToE.

Likewise, workflows individually customized by the user for double opt-in emailings are not included in the ToE, insofar as the user configures them for his own purposes in a way that deviates from the standard in ProCampaign.

The enrichment of ProCampaign with external data, i.e. data collected outside of ProCampaign, is not part of the target of evaluation. In particular, the external mosaic data that can be used for couponing is not the target of the evaluation.

In addition to the standard method of authentication to ProCampaign via username and password, ProCampaign also supports login via SingleSignOn services. The external

services are not part of the ToE, only the login via username and password directly to ProCampaign.

The ToE also does not include

- the data collection from the user and consumer
- the user's media that can be integrated via ProCampaign (in particular websites, call centers)
- the application environment at the user, consumer and fulfillment partner, e.g. on the PC or tablets
- the billing processes between Consultix GmbH and the user
- all services of Consultix GmbH beyond the IT service regarding ProCampaign.

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 Ltd. within Germany.

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

None relevant.

10. Edition of EuroPriSe Criteria used for the evaluation:

Version January 2017.

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

The framework agreement and data processing agreement were slightly adjusted. The data protection concept, data protection fact sheet, and documents and procedural instructions of the ISMS and data protection management system were updated. The user manual for ProCampaign was updated.

The ISO/IEC 27001 certification of Consultix GmbH and the test certificate of conformity to ISO/IEC 27018 (Cloud Services) based on it are still valid. A confirmation of conformity to ISO/IEC 27701 (data protection management) is a new addition.

ProCampaign can now be used specifically for the hotel and event industry to process a guest's data for the management and processing of the booking, e.g., to send the guest a reservation confirmation by e-mail.

A new feature is the "One-Click-Profile Export": Upon request of a data subject, the user can create a password-encrypted file with all profile data in ProCampaign with one click.

ProCampaign can now also be used to edit a website that can be used as a self-service center for consumers. In a Self Service Center, consumers can view, change, delete their data and give or revoke consent.

Change logs in Clean Up will no longer be saved for 1 month, but for 3, because otherwise there was a problem with the backups.

12. Changes in the legal and/or technical situation

The new RESERVATIONS function includes data processing on a contractual basis, e.g. for guests making reservations at a hotel.

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, reservations also for contractual purposes. 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 and minimisation

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, Cloud Services, Customer Relationship Management & Marketing Services, Professional Services sowie Development, Colocation, Internet Service*", which has been certified according to ISO/IEC 27001. Proof of testing is also available for the cloud service in accordance with ISO/IEC 27018 and the data protection management system in accordance with ISO/IEC 27701. The scope, which is audited by independent and expert auditors, is identical to the ToE of ProCampaign 8.11 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.

Implementation of consumers' rights

The CONTACT CENTER enables consumers to exercise their right of access via the integrated call centre. In addition, consumers may also ask for correction and deletion. In the spirit of informational self-determination, ProCampaign supports the configuration of a self-service center in which consumers can view, change, and delete their personal data as well as grant or revoke consent. The One-Click-Profile Export function enables immediate export of all stored profile data and supports the right to data portability. Also, the processor sensitizes the user to implement the rights of the data subjects. 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:

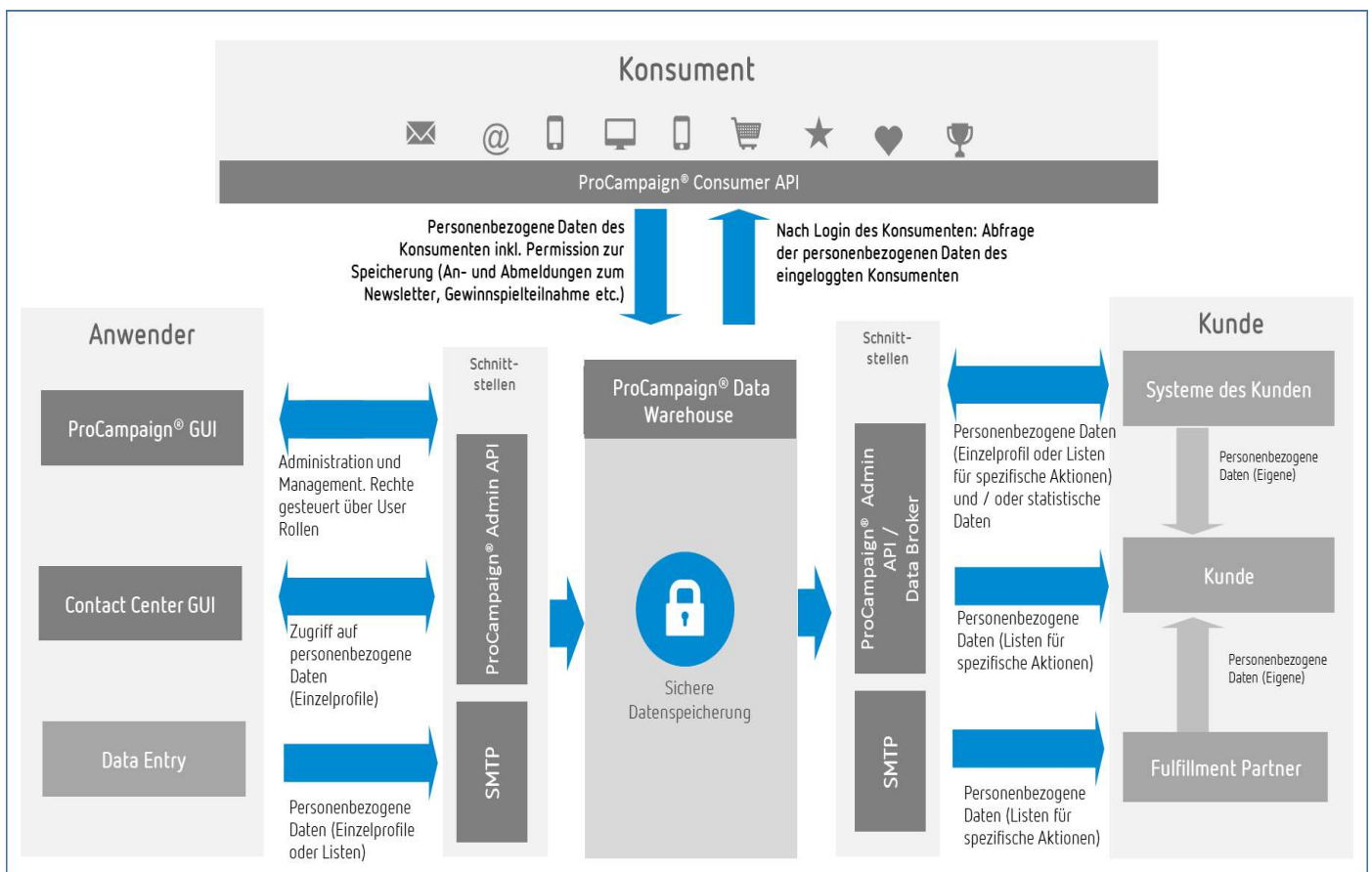


Figure 3: data flow

15. Privacy enhancing functionalities:

ProCampaigning includes the following features that promote data protection:

Product descriptions and notes on data processing in ProCampaign are informative, transparent, and usefully supplemented by individual training and training videos. Users are thus enabled to implement data processing operations for campaigns, complaint management, or bookings in a data protection-compliant manner.

ProCampaign is designed and optimized for data processing under the premise of consumer consent. To this end, it supports the management of consent (opt-in / opt-out) and its traceability.

ProCampaign supports the configuration of a self-service center in the sense of informational self-determination, in which consumers can view, change and delete their personal data as well as grant or revoke consent.

The One-Click-Profile Export function enables immediate export of all stored profile data and supports the right to data portability.

An integrated duplicate recognition prevents profiles from being created more than once in ProCampaign and thus supports data minimization.

In the spirit of Privacy by Design / Privacy by Default, Consultix GmbH aligns ProCampaign with the current requirements of data protection, for example through the restrictive handling of the storage period of opt-ins, a well thought-out clean-up process that is aligned with the principle of data minimization, or through a dedicated authorization concept that enables the assignment of very differentiated access rights.

Organizational and technical measures that Consultix GmbH takes for data security and data protection go beyond the legal requirements:

- Among other things, the company is certified according to ISO/IEC 27001. Test certificates are also available for the cloud service according to ISO/IEC 27018 and the data protection management system according to ISO/IEC 27701.
- ProCampaign has a high level of physical security thanks to exemplary data center equipment.

- ProCampaign has a high level of data availability thanks to a multi-level backup concept and infrastructure redundancy.

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:

Not relevant.

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	The CONTACT CENTER 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

		<p>opt-out dependent on their choice; also, the data processor is sensitizing the user to implement data subject's rights. In the spirit of informational self-determination, ProCampaign supports the configuration of a self-service center in which consumers can view, change, and delete their personal data as well as grant or revoke consent. The One-Click-Profile Export function enables immediate export of all stored profile data and supports the right to data portability. Also, the processor sensitizes the user to implement the rights of the data subjects.</p>
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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, 2022-07-27 Dr. Irene Karper LL.M.Eur.

A handwritten signature in black ink that reads 'Irene Karper'.

Place, date

Name of Legal Expert

Signature of Legal Expert

Bremen, 2022-07-27 Dr. Irene Karper LL.M.Eur

A handwritten signature in black ink that reads 'Irene Karper'.

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 Ltd.

Place, Date

Name of Certification Body

Signature