



Short Public Report

RISER-Service

Recertification No. 3

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

IT-based service: *Registry Information Service on European Residents („RISER-Service“)*

Functional status: May 2018.

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

Company Name: RISER ID Services GmbH

Company Address: Charlottenstraße. 80, 10117 Berlin, Germany

Web: www.riserid.eu

Contact Person: Mr. Stefan Göthe

3. Time frame of evaluation: 2018/01-01 – 2018-05-11

4. EuroPriSe Experts who evaluated the IT product / 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

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):

Components related to the service:

- RISER Internal Client
- RISER Application including
 - eMA monitorings
- RISER Customer-Portal, RISER Supplier-Portal and RISER Registration-Authorities-Portal

Not part of the ToE are:

- The use of RISER via smartphone or tablet
- The operational environment on the customer's site
- Hardware and operatingsystems in the datacenter
- Determining of postal addresses on the database of the Deutsche Post address GmbH & Co. KG, as well as determining the birth data at Schufa Holding AG, which can optionally be used before using the Registry Information Service.
- Realtime-ID-Check and Realtime-Age-Check
- credit agencies of the suppliers and population registers
- further services of RISER ID Service GmbH.

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

RISER ("registry information service on European residents") is an IT product and IT-based service. RISER is offered by the RISER ID Services GmbH as registration data broker to obtaining registration information on behalf of public or private bodies. These can be simple and to a limited extent also advanced official register inquiries for Germany, Switzerland and Austria via RISER.

Customer-Inquiries for different countries or communities are submitted via a central web portal at <https://www.riserid.eu>. RISER distributes a request to the respective register office. The register office processed the request and sends the result back to RISER. Following this, the result can be downloaded from the web portal by the customer. The results are deleted, taking into account the contractual retention period.

When obtaining register inquiries, the RISER ID Services GmbH prepares the request and result data, by checking manually the incoming or outgoing data for plausibility, adapted format structures and inconsistent results.



Figure 1 Workflow – simplified view

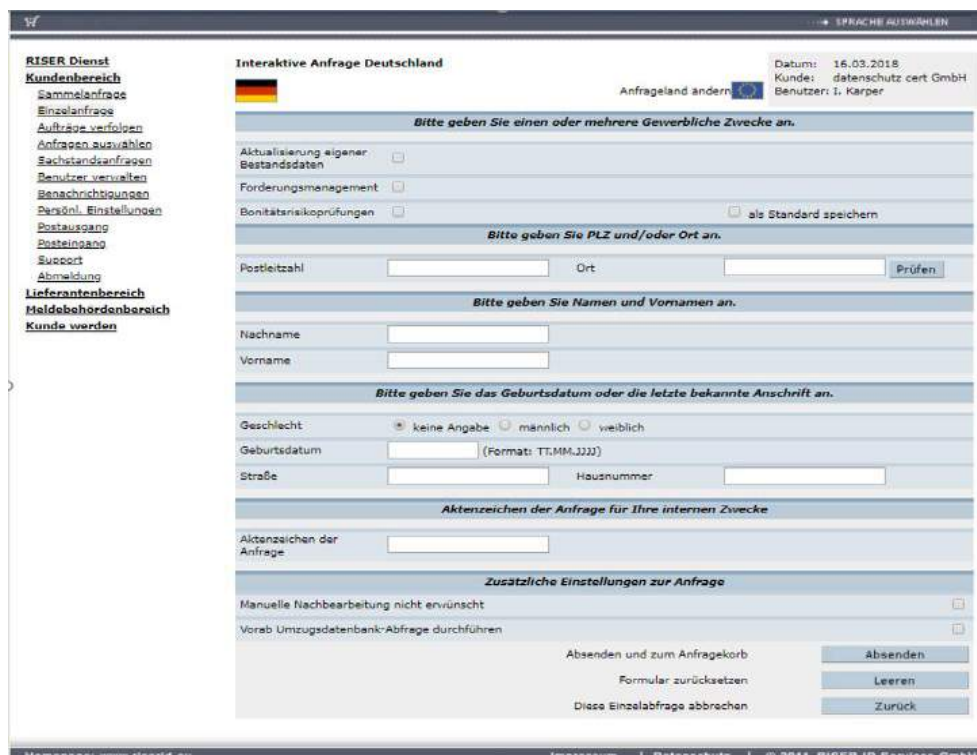
Users of RISER are companies and public bodies, which are based in the EU, suppliers (broker services) and registration authorities. Users can log in with name, ID and password on the closed user-group and maintain person related master data for their account, obtain performance records, or process information.

The customer can request this information through single inquiries or through mass inquiries. For a single inquiry, data is directly entered into a form, which is adapted to the requirements of the relevant national or local registry office. Mass inquiries are

catered for by transferring a file containing multiple data sets with inquiries. The customer receives a collection of orders, indication of price, and the request to confirm the selection with "OK" which places the order into the user's account. RISER processes the confirmed request and provides the registration results in the account again.

With the optional "eMA-monitoring" an additional service is offered to improve the quality of services. The customer will be informed by RISER in case of time-delayed updates in the population register. The customer is informed when selecting this additional service, if the registration authority gains new information, and can selectively stimulate a new request to this person. In the course of eMA-Monitoring neither personal request and result data is stored permanently for own purposes, nor is the data released to third parties (so-called addresspooling). eMA-monitoring is subject to evaluation.

Addresses can optionally be determined by RISER in the database of the Deutsche Post Adress GmbH & Co. KG. In addition, RISER provides the optional potentiality to determine dates of birth to a requested person at the Schufa Holding AG, if there is a legitimate interest. Moving database and credit agency are not subject of the evaluation.



The screenshot shows the 'Interaktive Anfrage Deutschland' web form. The interface is in German. At the top right, it displays the date 'Datum: 16.03.2018', the customer 'Kunde: datenschutz cert GmbH', and the user 'Benutzer: J. Karper'. The form is divided into several sections:

- Bitte geben Sie einen oder mehrere Gewerbliche Zwecke an.** (Please specify one or more commercial purposes): Includes checkboxes for 'Aktualisierung eigener Bestandsdaten', 'Forderungsmanagement', and 'Bonitätsrisikoprüfungen'. There is also a checkbox for 'als Standard speichern'.
- Bitte geben Sie PLZ und/oder Ort an.** (Please provide postal code and/or location): Includes input fields for 'Postleitzahl' and 'Ort', and a 'Prüfen' button.
- Bitte geben Sie Namen und Vornamen an.** (Please provide names and first names): Includes input fields for 'Nachname' and 'Vorname'.
- Bitte geben Sie das Geburtsdatum oder die letzte bekannte Anschrift an.** (Please provide the date of birth or the last known address): Includes radio buttons for 'Geschlecht' (keine Angabe, männlich, weiblich), an input field for 'Geburtsdatum' (Format: TT.MM.JJJJ), and input fields for 'Straße' and 'Hausnummer'.
- Aktenzeichen der Anfrage für Ihre internen Zwecke** (Internal reference number): Includes an input field for 'Aktenzzeichen der Anfrage'.
- Zusätzliche Einstellungen zur Anfrage** (Additional settings): Includes checkboxes for 'Manuelle Nachbearbeitung nicht erwünscht' and 'Vorab Umzugsdatenbank-Abfrage durchführen'.

At the bottom right, there are buttons for 'Absenden und zum Anfragekorb', 'Absenden', 'Formular zurücksetzen', 'Leeren', 'Diese Einzelabfrage abbrechen', and 'Zurück'. The footer contains the website 'Homepage: www.riserid.eu', 'Impressum', 'Datenschutz', and '© 2011 RISER ID Services GmbH'.

Figure 2 example for a single inquiry

In the standard design of RISER inquiry and results data for customers are stored on an archiving server for six weeks. Customers can set a shorter retention period. Thereafter the data is adopted by the revision database of RISER, which serves the verification and accounting for reporting to authorities and customers. The inquiry and results data are kept 90 days before made anonymous and the receipt archived with no personal connection.

Order and result data will be made available to the customer for download after being transmitted by the registration office for 42 days in the customer portal. Then the order and result data are transferred to the revision database.

The RISER ID Services GmbH undertakes the register query process as well as the preparation of the result data on behalf of the customer at the site in Berlin. The RISER IT systems are housed on behalf of RISER ID Services GmbH in the datacenter of QSC AG in Munich. This is a pure housing. The IXSYS EDV Systemberatung in Munich is commissioned to undertake the operation of IT-systems through the RISER ID Services GmbH. For the implementation of conventional (usually written) registration inquiries the RISER ID Services GmbH makes use of sub-contractors based in Germany, Swiss and Austria.

8. Transnational issues:

The RISER service is provided for the countries Germany, Austria and Switzerland.

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

None.

10. Edition of EuroPriSe Criteria used for the evaluation:

EuroPriSe Criteria Catalogue, January 2017.

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

In the web frontend and the interface to the registration office, the request and result documents run on OSCI xMeld 2.3 (from May 2018: 2.3.1). There, the indication of the commercial purpose "address determination and transfer to a notified body" and the indication of the customer ID is required. Furthermore, it must be stated that the request is not made for the purposes of advertising and address trading.

If the customer does not know the date of birth of the wanted person, this can be determined via a birth data enrichment. For this, the given first name and the address of the requested person are submitted to the Schufa. If the person is known to Schufa, the date of birth is transmitted as the result. The legal prerequisite for the enrichment of birth data is the conclusion of a supplementary agreement by the requesting customer.

The processing of ERMA requests requires documents, e.g. to prove legitimate interest. Documents can be scanned and stored in the RISER service and then sent with requests.

This service of address (end)verification has been discontinued.

Functions for processing "Internet delivery lock" have been removed from the RISER service, e.g. the repeated conventional dispatch of inquiries.

For public inquiries, date and place of death may form part of the result data.

Each 1.5. and 1.11. of a year a new xMeld standard is introduced. The interfaces to suppliers of RISER will be adapted to the changed standards. When converting to XMeld 2.2. a standardization of the spelling of place names had to be introduced, since addresses had to be given with indication of the place name. With XMeld 2.3 the sex can be used again as a request feature.

A keyword list intercepts requests that relate to companies rather than individuals.

Improvements have been made in the oversight of requests from registrars / subcontractors This includes features that track down individual, open requests that are probably unedited due to "conditional revocation".

Individual municipalities may reject the processing of requests for specific clients or with specific purposes. With community locks differentiated locks can be realized for this, so that such requests can be recognized and rejected during the commissioning.

A new monitoring can be used to monitor that the financial effort required for manual post-processing is commensurate with the quality.

As far as federal states or registration authorities for public inquiries are not reached via direct connections, inquiries are processed via the brokers ekom21 and kivbf.

RISER has been enhanced with features for monitoring system resources (disk space, disk space, database).

Addresses with special facilities (such as prisons, psychiatric institutions, retirement homes) are for the most part subject to conditional blocking notices. Via the negative addresses, such addresses are recognized and blocked for requests.

On request, a log can be created for customers when their data has been deleted.

Using processing rules, it is possible to set customer-specific and message-specific, whether for certain requests, a manual post-processing should be performed. For example, the postprocessing can be turned off for requests without date of birth.

Hit lists (public) requests use the XMeld standard 1320/1321. If several persons or data records are determined with the specified search characteristics, a hit list is transmitted. The processing of RISER has been extended accordingly to reduce such hit lists to the requested person.

Furthermore, various patches for quality improvement or bug fixes without changes of the functionalities of RISER took place.

12. Changes in the legal and/or technical situation

On the basis of the "General Application Notes to § 47 BMG" of the German Federal Ministry of Economics of 2016-12-16 on the clarification of when an data processing is available for report requests, a corresponding free text field has been inserted in RISER, in which now has to be deposited whether an data processing is present or not. For this purpose, the name of the client must be provided in addition to the commercial purpose. These are only business-related information about legal entities.

Due to the changes of para 49 the Federal Registration Act (Bundesmeldegesetz - BMG) requesters in RISER had to specify two additional search criteria of the data subject in addition to first and last names in order to identify the person concerned. The address was defined by RISER as "two" search criteria. The search feature "gender" was also allowed again, although a search was excluded together with the property marital status.

Furthermore, the company's data protection management was adapted to the requirements of the GDPR.

13. Evaluation results:

Using RISER companies and public authorities in Germany, Austria and Switzerland obtain a user-friendly way to assign a registration data broker obtaining registration

information. The RISER GmbH is working as a data processor. Rights and obligations are governed by a contract to order data processing, which complies with all aspects of data protection as stated in the GDPR. Also incorporated subcontractors of the RISER ID Services are legally bound by contract and checked regularly.

The scope of the data processing using RISER is tailored to the data required by the respective registration authorities. The auditors verified that RISER serves the purpose to process as few data as necessary and at the same time only relevant data. RISER is constantly being optimized for this purpose.

As far as additional data is entered at all in a request entry in form fields, this is optionally done by the customer. Moreover, RISER doesn't store data permanently for their own purposes, but reduced the storage time of the inquiry and results data in the standard version to 6 weeks, to allow the customer the retrieval. Then the data is transferred to the revision database of RISER, which serves the verification and accounting to reporting authorities and customers. The inquiry and results data are kept here 90 days before being made anonymous and the billing information archived without any personal reference. Order and result data will be made available to the customer for download after being transmitted by the registration office for 42 days in the customer portal. Then the order and result data are transferred to the revision database.

Also, with the optional eMA-monitoring only dedicated data is used. RISER reduces data to a hash value that cannot be decrypted on the part of the RISER ID Services GmbH. This prevents reuse of results data from the registration authority.

The use of RISER is intuitive. Customers can see at any time the processing steps and what data are in the workflow.

All essential documentation is available in German and English language. The information is easily accessible, meaningful and informs the user comprehensively about RISER, the use and the data processing operations.

Registration requests and the use of the provided data must be carried out only on the basis of the registration laws. RISER supports compliance with the respective legal bases by configuring form fields and data records, so that they meet the requirements of the respective registration authority and at the same time are accepted for a request of register information by these.

The data processing using RISER is usually not initiated by the data subject itself but by the customer as the responsible body. Therefore, the data processing using RISER depends on the interests of all those involved in addition to the legal and contractual bases. The customer is obliged to ensure the compliance with the requirements under the contractual agreement. On the other hand, the registration authority is responsible for the provision of register information on the basis of legislation.

RISER complies with legal requirements for giving a reason and purpose of the information by having the commercial purpose to be specified mandatorily for simple register information of private legal persons from German authorities (article 44, paragraph 1, sentence 2 BMG). For advanced register information, a legitimate interest in accordance with § 45 BMG must credibly be shown, which is captured by RISER on corresponding data fields and only then passed on to the registration authorities. Also, customers must assure now contractually that the requests for register information are not for the purposes of advertising and address trading. They undertake to give a unique business reference in the requests and will be pointed out, as far as possible to specify the date of birth to the requested person in the request to the register information.

In case of legal barriers according to the respective registration law, registration information is not given by the respective authority.

The data minimization in the sense of article 5 GDPR is respected because the user is given the ability to reduce the amount of data to a minimum using RISER.

This applies also for the upstream methods to query a date of birth at the Schufa Holding AG. Pursuant to § 49 para 4 BMG information may only be given, if the applicant has described the requested person with family name or former name and at least one given name as well as with two more data stored on the basis of § 3 para 1 BMG, except the Nr. 1 to 4, 7, 10 and 11, and the requested identity has been proven by the automated alignment of the given data in the request and the stored data. A phonetic search is permissible for surname, previous names and given name. Then the use of the sex of the queried person for a request is now allowed. Furthermore, the date of birth (section 3 para 1 No. 6 BMG) represents the key attribute of the request for the customer of RISER. Since not every customer has the date of birth to the requested person, RISER allows an upstream request to the date of birth at the Schufa Holding AG. Knowing the date of birth, the register information can then be obtained for this person according to § 49 BMG.

This also applies to the address research in the moving database of Deutsche Post Adress GmbH & Co. KG. This can be done optionally in advance of register information, to update the address. The person concerned has granted a consent to the entry into the moving database with a forwarding request. Without having issued a forwarding request or when having revoked the consent, his data is not in the database.

Optional eMA-monitoring is also proportionate. It serves only quality improvement using hash values. No reuse of registration data takes place but intervenes only in cases where the result data set of the population register is not usable and the possibility of a correction is in the legitimate interests of the customer.

RISER as the responsible body supports the implementation of the rights of the person concerned, by giving the user all the necessary information on the data processing, which would be required for a notification of persons concerned. RISER ID services has also established a well-structured data protection management, which can help the customer if necessary.

The technical and organizational data protection measures taken by RISER are adequate. The certification of the datacenter of QSC AG in accordance with ISO/IEC 27001:2013 for the scope "Cloud Services, IT Outsourcing, Housing, Hosting, IT Consulting, Internet, Telephony and Networking" proves their implementation and effectiveness. Technical and organizational data protection and data security measures are contractually binding set with all subcontractors. In this respect the IXSYS EDV Systemberatung participates in the security measures taken on the part of the data center.

RISER portal users are prompted in different places to submit a secure password. The Web pages are encrypted via https and adequately protected against unauthorized reading of communications during data transfer. No web tracking tool is used within the RISER portal.

All system activities in the editing process are logged and processed in the RISER internal client for monitoring and control. The log-data is stored for troubleshooting as well as for abuse prevention for 6 months and then automatically deleted. This is necessary, especially in the case of potential abuse (such as e.g. the use of the account by unauthorized users or for private purposes), because cases are usually detected and claimed by the customer with a considerable time lag in the wake of the accounting control. An evaluation is carried out in case of need, which is plausible.

Data encryption is based on a well-structured crypto-concept which is implemented with reasonably safe encryption mechanisms.

Operative business of the RISER service takes place in the offices of RISER ID Services GmbH in Berlin in accordance with an IT-concept. The RISER ID Services GmbH has a detailed and well-structured fault and emergency management as well as a test and approval procedure established and documented.

14. Data flow:

The following figures describe the data flows:

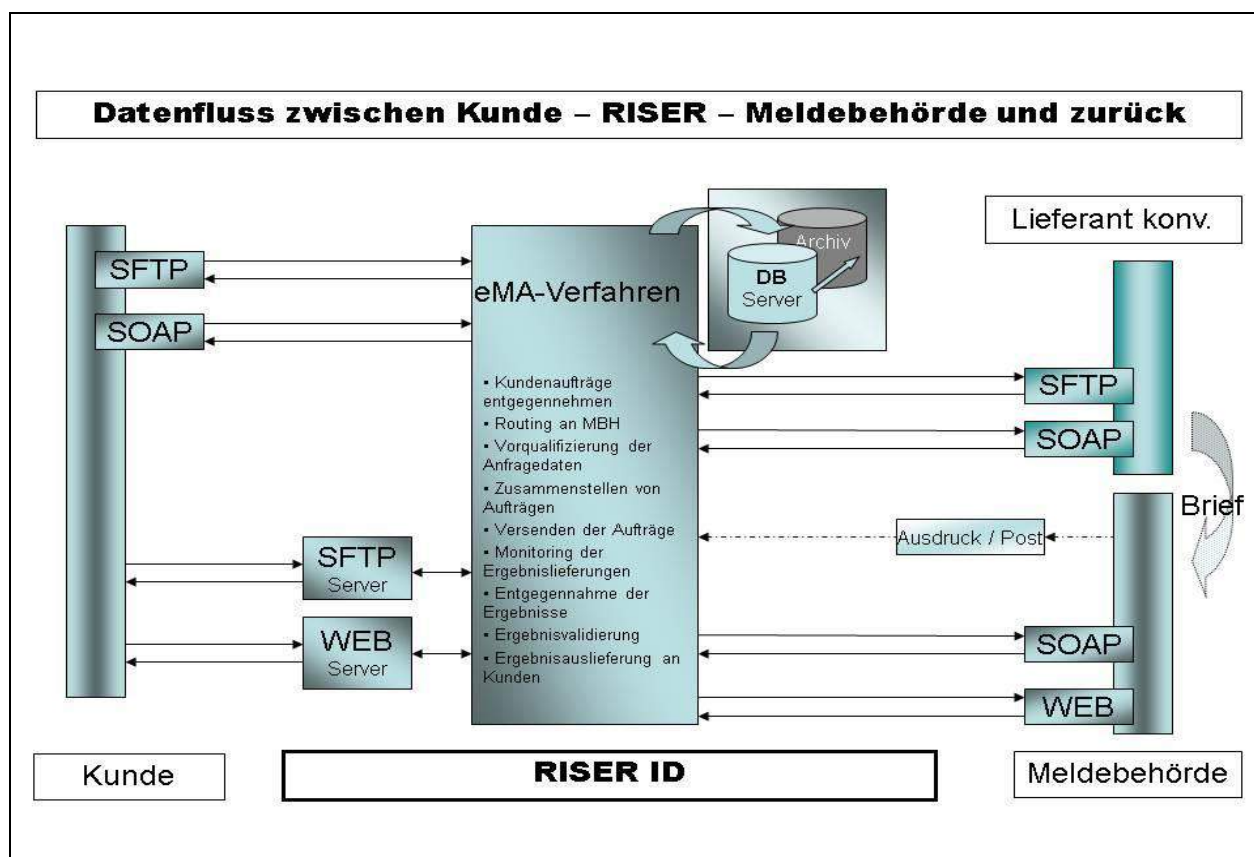


Figure 3 Data Flow – simple register information

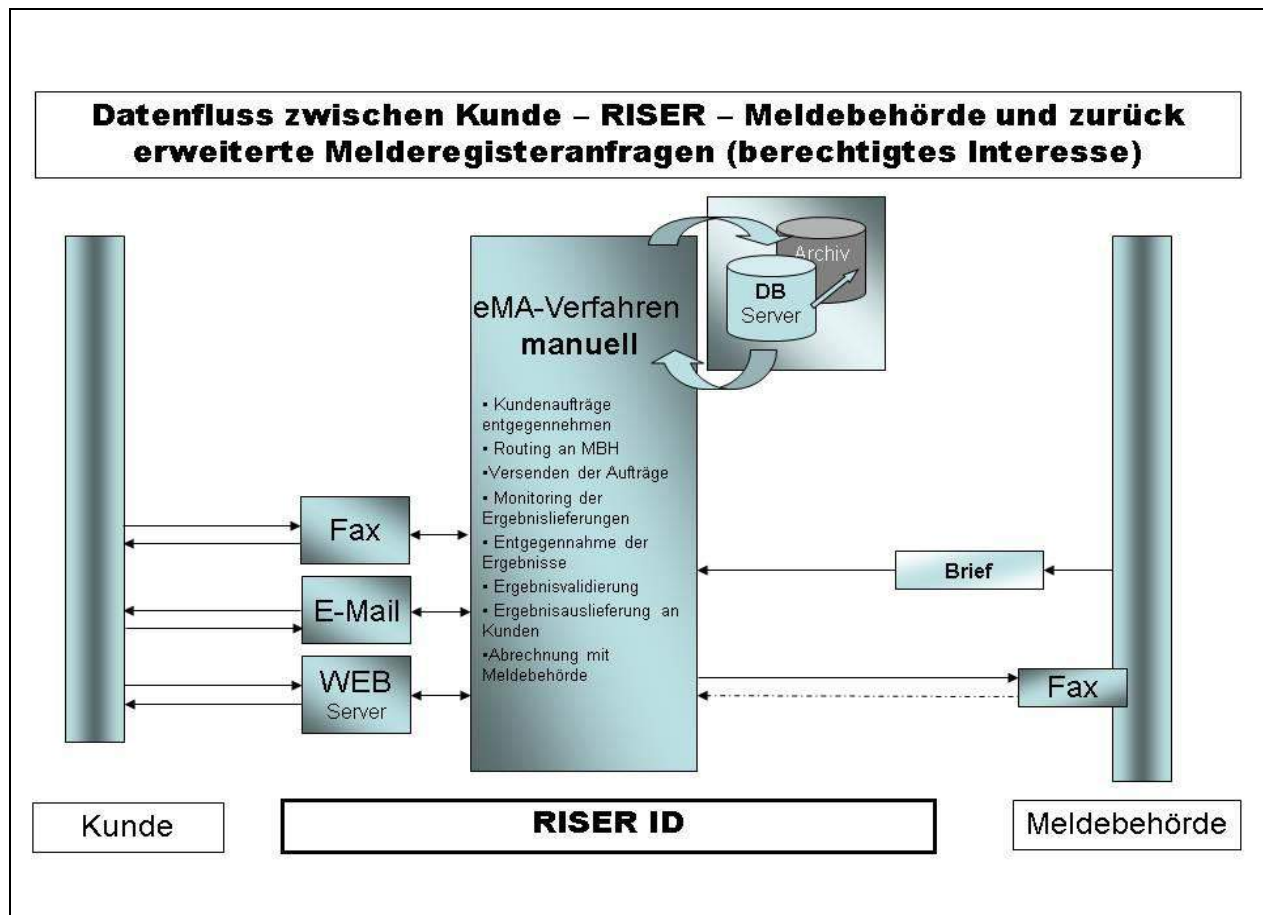


Figure 4 Data Flow – advanced register information

15. Privacy enhancing functionalities:

The scope of the data processing using RISER is tailored to the data required by the respective registration authorities. It can be stated that RISER serves the purpose in terms of data minimization and data avoidance, to process as few data as necessary and at the same time only relevant data. RISER is constantly optimized for this purpose. The current, informative and user-friendly information to RISER enables the user exemplarily, to protect rights of persons affected.

16. Issues demanding special user attention:

None.

17. Compensation of weaknesses:

There is no need for compensation since there is no weakness.

18. Decision table on relevant requirements:

<i>EuroPriSe Requirement</i>	<i>Decision</i>	<i>Remarks</i>
Data Avoidance and Minimisation	adequate	The scope of the data processing using RISER is tailored to the data required by the respective registration authorities. It could be stated that RISER serves the purpose to process as few data as necessary and at the same time only relevant data. RISER is constantly optimized for this purpose.
Transparency	adequate	Documentation and data protection statement are informative, up-to-date and easy to understand.
Technical-Organisational Measures	adequate	Physical access protection, logging mechanisms, backup and recovery mechanisms, incident management and tests and release procedure follow a well-structured approach and are up-to-date and appropriately implemented.
Data Subjects' Rights	adequate	Transparent and up-to-date documentation on data protection and IT security enables users adequately to fulfil the rights of the individuals affected

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, 2018-05-11 Dr. Irene Karper LL.M.Eur.



Place, date	Name of Legal Expert	Signature of Legal Expert
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Bremen, 2018-05-11 Alexey Testsov



Place, date	Name of Technical Expert	Signature of Technical Expert
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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 Certification Authority

Place, Date	Name of Certification Body	Signature
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