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## **Report for the REISSWOLF archive. manager. software for DSGVO/GDPR conformity**

**Berlin, 4. Mai 2020**

### **Test order**

REISSWOLF International AG is a service company that digitises, archives and destroys files and data on behalf of its customers.

Bitkom Servicegesellschaft mbH was asked to prepare a test certificate for the REISSWOLF archive. manager. (hereafter referred to as „RWAM“) software and to check the correct implementation of the data protection requirements of the DSGVO/GDPR. Within the scope of this order, we received a test account for the software and were thus able to access all the program's functionalities. The result of this test is also based on numerous discussions with our contact person on site and the answers to a catalogue of questions from the responsible departments. Within the scope of this analysis, we concentrated on the technical design of the software and in particular checked compliance with data protection regulations. It was also important for us to understand that the protection of the rights of the persons or users concerned is also supported technically.

### **Summary**

With the software REISSWOLF archive. manager. software is a protected and personalised web interface which ensures the administration of outsourced files via the Internet browser. Access to the self-developed archive software „RWAM“ is TLS 1.2. encrypted. All information about the files is displayed live, so that the user has the possibility to manage file movements and statistics, to research comfortably and also to access the archive digitally /scan-on-demand.

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The examination of the software with regard to the data protection-compliant processing of personal data has shown that REISSWOLF Systems GmbH meets the data protection requirements of the EU Data Protection Basic Regulation (DSGVO/GDPR) and has implemented numerous technical and organisational measures to ensure compliance at a high level. Data protection and data security have a high priority in the company and this is also reflected in the software.

This is also reflected in the fact that the company has had its management system certified on the basis of ISO 9001 and 27001. The same also applies to the data protection management system.

The product meets the requirements of Privacy by Design and Privacy by Default according to article 25 DSGVO/GDPR. The legitimate user can take additional measures and manage users and rights by activating an administration interface which serves for self-administration. Numerous combinable access guidelines allow further restrictions on access to authorised groups of people. A successful authorization concept is evident here.

Furthermore, the DSGVO/GDPR principles of processing personal data, in particular transparency, good faith, purpose limitation and data minimisation, are observed accordingly. As a matter of principle, only personal data whose processing is necessary for the particular processing purpose in question will be processed.

All data connections between the „RWAM“ software users as well as the connections to the REISSWOLF branch office are TLS 1.2 encrypted. Users still have the option of a 2-factor authentication procedure in the registration process and set an individual IP limit. Corresponding default settings and additional technical and organisational measures ensure that unauthorised persons cannot access the software.

All passwords are stored in the system in one-way encryption (BCRYPT method) according to the latest standards and cannot be read out again by either the user or REISSWOLF.

Within the framework of a comprehensive data protection and IT security concept, which the company has implemented to offer users of the REISSWOLF archive. manager. software the best possible protection of their personal data, there are still guidelines and corresponding processes. These ensure the continuous improvement, examination and further development of these measures, taking into account the state of the art, implementation costs and the type, scope, circumstances and purposes of processing as well as the varying probability of occurrence and severity of the risk to the rights and freedoms of natural persons, in this case the users.

In summary, it can be stated that REISSWOLF Systems GmbH has not only implemented comprehensive data protection requirements with regard to its

archiving software, but has also met the high requirements of the basic data protection regulation with regard to development and operation in its design and implementation.

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