

Independent auditor's ISAE 3000 assurance report on internal controls regarding data protection and processing of personal data for the period 25 May 2018 to 31 December 2018

ISAE 3000

Sentia Denmark A/S

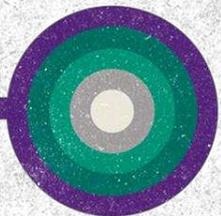
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Symbol	
●	Our review has not found significant exceptions.
●	Our review has found few weaknesses.
●	Our review has found significant weaknesses or exceptions.



1. Management statement

Sentia Denmark A/S performs processing of personal data (“personal identifiable information” or “PII” in Sentia terms) on behalf of customers, that are data controllers according to EU's regulation on ”Protection of natural persons with regard to the processing of personal data and on the movement of such data” (subsequently ”Data Protection Regulation”).

The accompanying description has been prepared for data controllers, who have used Sentia Denmark A/S, and have a sufficient understanding to consider the description, along with other information, including information about controls operated by data controller themselves, when assessing whether the requirements in the Data Protection Regulation are complied with.

Sentia Denmark A/S confirms that:

- a) The accompanying description in section 3 fairly presents the managed services' processing of personal data on behalf of data controllers regulated by the Data Protection Regulation for Sentia Denmark A/S customers in the period 25 May 2018 – 31 December 2018. The criteria used in making this statement were that the accompanying description:
 - i. Presents how the system was designed and implemented, including:
 - The types of services provided, including types of personal data processed.
 - The procedures, within both information technology and manual systems, by which processing of personal data were initiated, recorded, processed, corrected as necessary, erased and restricted.
 - The procedures ensuring that processing of personal data is in accordance with contracts, instructions and agreements with the data controllers.

- The procedures ensuring that the persons authorized to process personal data have committed themselves to confidentiality or are under an appropriate statutory obligation of confidentiality.
- The procedures for how the processor, at the choice of the data controller, erases or returns all the personal data to the data controller after the end of the provision of services relating to processing, and erases existing copies unless law or other regulation requires storage of the personal data.
- The procedures for handling of personal data breaches supports that the data controller can communicate to the authorities and inform the data subjects in a timely manner.
- The procedures ensuring adequate technical and organizational measures for the processing of personal data based on the risks associated with the processing for unintentional or illegal erasure, loss, change, unauthorized distribution of or access to personal data, that is transmitted, stored or in any other way processed.
- Controls that we assumed, in the design of the system, would be implemented by data controllers, and which, if necessary to achieve control objectives stated in the accompanying description, are identified in the description along with the specific control objectives that cannot be achieved by us alone.

1. Management statement

- Other aspects of our control environment, risk assessment process, information system (including the related business processes) and communication, control activities and monitoring controls that were relevant to processing personal data.
- i. Includes relevant details of changes to the data processor's system for processing personal for the period 25 May 2018 – 31 December 2018.
 - ii. Does not omit or distort information relevant to the scope of the system being described for processing of personal data, while acknowledging that the description is prepared to meet the common needs of a broad range of data controllers and may not, therefore, include every aspect at Sentia that each individual data controller may consider important in its own particular environment
- b) The controls related to the control objectives stated in the accompanying description were suitably designed and operated effectively for the period 25 May 2018 – 31 December 2018. The criteria used in making this statement were that:
- i. The risks that threatened achievement of the control objectives stated in the description were identified;
 - ii. The identified controls would, if operated as described, provide reasonable assurance that those risks did not prevent the stated control objectives from being achieved; and
 - iii. The controls were consistently applied as designed, including that manual controls were applied by individuals who have the appropriate competence and authority, for the period 25 May 2018 – 31 December 2018.

- c) Appropriate technical and organizational security measures have been implemented and maintained to comply with the agreements with the data controllers, good practice for data processing and relevant requirements for data processors according to the Data Protection Regulation.

Copenhagen 13 June 2019
Sentia Denmark A/S
Lyskær 3A, 2730 Herlev
CVR-nr.: DK-10008123

Tony Jensen Trolle
Compliance Officer

2. Independent auditor's ISAE 3000 assurance report on internal controls regarding data protection and processing of personal data

To the Management of Sentia Denmark A/S and data controller, receiving data processing services from Sentia Denmark A/S.

We have been engaged to report on Sentia's defined control objectives and on the design of controls regarding Sentia Denmark A/S' services for the period 25 May 2018 – 31 December 2018.

Control objectives and controls have been defined by Sentia Denmark A/S on the basis of EU's regulation on "Protection of natural persons with regard to the processing of personal data and on the free movement of such data" (subsequently the "Data Protection Regulation").

Our report covers whether Sentia has established and designed appropriate controls related to the control objectives stated in section 4 regarding Sentia Denmark A/S' role as a data processor. Thus, the report does not include an assessment of Sentia Denmark A/S' general compliance with the above legislation.

Control objectives and associated control activities related to the customers' responsibilities as a data controller are not included in our report, and it does not comprise customer-specific matters.

Sentia Denmark A/S' responsibilities

Sentia Denmark A/S is responsible for: preparing the description and accompanying management statement, including for the completeness, accuracy and method of presentation of the description and statement; providing the services covered by the description; stating the control objectives and designing, implementing and effectively operating controls to achieve the stated control objectives.

Auditor's independence and quality control

We have complied with the independence requirements and other ethical requirements of the Code of Ethics for Professional Accountants issued by FSR – Danish Auditors, which is founded on fundamental principles of integrity,

objectivity, professional competence and due care, confidentiality and professional behavior.

Grant Thornton applies International Standard on Quality Control 1 and accordingly maintains a comprehensive system of quality control, including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Auditor's responsibilities

Based on our procedures, our responsibility is to express an opinion on Sentia Denmark A/S' design and operation of controls related to the control objectives stated in section 4.

We have conducted our engagement in accordance with ISAE 3000, "Assurance engagements other than audits or reviews of historical financial information", and additional requirements under Danish audit regulation. This standard requires that we plan and perform our procedures to obtain reasonable assurance about whether, in all material respects, the description of control objectives is fairly presented, and the controls are suitably designed and operating effectively.

An assurance engagement to report on the description of control objectives and the design and operating effectiveness of controls at a data processor involves performing procedures to obtain evidence about the defined control objectives and the design and operating effectiveness of controls. The selected procedures depends on the auditor's judgement, including the assessment of the risks that the controls are not suitably designed and operating effectively.

2. Independent auditor's ISAE 3000 assurance report on internal controls regarding data protection and processing of personal data

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Limitations of controls at a data processor

Sentia Denmark A/S' description of control objectives has been prepared to meet the common needs of a broad range of data controllers. Consequently, it may not include all the aspects that each individual data controller considers important in its own particular environment. Furthermore, because of their nature, controls at a data processor may not prevent or detect all breaches of personal data.

Conclusion

Our conclusion has been formed on the basis of the matters outlined in this report. The criteria we used in forming our opinion are those described in Management's statement. In our opinion, in all material respects:

- a) The description fairly presents the control objectives as designed and implemented for the period 25 May 2018 – 31 December 2018.
- b) The controls related to the control objectives stated in the description were suitably designed as for the period 25 May 2018 – 31 December 2018.
- c) The controls tested, which were those necessary to provide reasonable assurance that the control objectives were achieved, operated effectively for the period 25 May 2018 – 31 December 2018.

Intended receivers and purpose

This statement is exclusively intended for customers that have used Sentia Denmark A/S' offerings, and their controllers, who has the sufficient competences to evaluate the supplied description along with the other information, including the information on the customers' own controls.

This information serves the purpose to obtain an understanding of the customer's information systems, which are relevant for the statement.

Copenhagen, 13 June 2019

Grant Thornton

State authorized public accountants
CVR-nr: 34 20 99 36

Jacob Helly Juell-Hansen
State authorized public accountant

Anders Grønning-Kjærgaard
Head of IT Audit & Advisory

3. Description of setup regarding processing of personal data

3.1 Description of Personal Identifiable Information (PII) processing by Sentia Denmark A/S

Sentia Denmark A/S is the leading provider of managed cloud solutions and data processing in Denmark.

As a Data processor or Data sub-processor for managed cloud solutions and data processing, Sentia Denmark A/S has implemented Data Processing Agreements (DPA), with our customers as Data controllers. Data processing is implemented according to customer instructions.

The following description refers to the relevant articles of the General Data Protection Regulation which are included in this statement.

Principles of processing of personal data (Article 5)

Sentia Denmark A/S processes PII solely under instructions from the data controller. Sentia Denmark A/S safeguards this principle by instructing all employees to do so, on the basis of guidelines on the matter included in a PII policy, and the registration of customer instructions through DPA. Sentia Denmark A/S implement updates to the DPA and instructions based on enquiries from the Data controller.

Lawfulness of processing (Article 6)

Sentia Denmark A/S ensures the lawfulness of the PII processing by concluding DPA, including instructions. In case of a PII breach under the responsibility of Sentia Denmark A/S, a process for how to handle this has been implemented in order to ensure reporting to the data controller in a timely manner.

Processing of special categories of PII (Articles 9 and 10)

The customer's classification of PII data is recorded in the DPA. If there are special instructions according to the special categories of PII, this is recorded in the customers Operational manual and are implemented through normal Change

Management.

The right to restrict data processing (Articles 18 and 19)

Through the above-mentioned implementation of data processing for our customers, in their capacities as data controllers, Sentia Denmark A/S only performs data processing according to instructions from Data controller.

Responsibility of the data controller – implementation of appropriate data protection (Article 24)

Sentia Denmark A/S has implemented appropriate protection of PII according to the Service delivery agreement. The security baselines for each service are based on risk management.

Records of processing activities (Article 30)

Sentia Denmark A/S maintains a record of processing activities. The record consolidates an overview of all customers DPA's in Sentia Denmark A/S.

Security of processing (article 32)

Sentia Denmark A/S continually maintains risk management of processes regarding PII data among others for our customers, as data controllers.

Notification of a personal data breach to the supervisory authority (Articles 33 and 34)

Sentia Denmark A/S has established a process for the notification of personal data breach to the data controller.

3. Description of setup regarding processing of personal data

3.2 Complementary controls of data controllers

When concluding a DPA, the data controller must ensure that the following has been documented:

- Clarifications/additions to the DPA
- Categories of PII data
- Specific instructions

If, at any time, changes are made to the instructions or categories of PII data, the data controller must report this to gdpr@sentia.dk

4. Control objectives, controls, tests and related findings

Purpose and scope

We have conducted our engagement in accordance with ISAE 3000, Assurance engagements other than audits or reviews of historical financial information and additional requirements under Danish audit regulation.

Our testing of the design, implementation and functionality of the controls included the control objectives and related control activities selected by Management and listed in section 4.3. Any other control objectives, related controls and controls at the affiliated enterprises are not covered by our test activities.

Our operating effectiveness testing included the control activities deemed necessary to obtain reasonable assurance that the stated control activities were achieved for the period 25 May 2018 – 31 December 2018.

Test activities performed

The test activities performed when determining the operating effectiveness of the controls are described below.

Metode	Description
Inquiries	Inquiry of appropriate personnel. Inquiries have included how the controls are performed.
Observation	We have observed the execution of the control.
Inspection	Reading of documents and reports containing specifications regarding the execution of the control. This includes reading and consideration of reports and other documentation in order to assess whether specific controls are designed so they may be expected to become effective, if implemented. Furthermore, it is assessed whether controls are being monitored and checked sufficiently and at appropriate intervals.
Repetition of the control	Repeat the relevant control. We have repeated the execution of the control to verify that the control functions as assumed.

4. Control objectives, controls, tests and related findings

Principles relating to processing of personal data (Article 5)

Control objective:

Procedures and controls has been established to ensure that ensure that the collection, processing and storage of personal data take place in accordance with the principles relating to processing of personal data

<i>Data processor's control activity</i>	<i>Test performed by controller</i>	<i>Result of controllers test</i>
<p>There has made written procedures in which a decision has been made on the following principles related to processing of personal data:</p> <ul style="list-style-type: none"> • Lawfulness, fairness and transparency • Purpose limitation • Data minimization • Accuracy • Storage limitation • Integrity and confidentiality. <p>A regular – at least annual – assessment is carried out of whether the procedures need to be updated.</p>	<p>Inspected that there are updated written procedures for processing of personal data that include principles related to processing of personal data.</p>	<p>No exceptions noted.</p>
<p>There are regular – at least annual – assessments principles related to processing of personal data are being complied with and this assessment is documented</p>	<p>Inspected documentation for the assessment of principles related to processing of personal data in order to ensure an annual assessment is carried out at least annually of principles for processing of personal data and compliance with these.</p>	<p>No exceptions noted.</p>
<p>Management has dealt with and approved the assessment of compliance with the principles related to processing of personal data.</p>	<p>Inspected documentation of management's approval of the assessment of compliance with the principles for processing of personal data.</p>	<p>No exceptions noted.</p>

4. Control objectives, controls, tests and related findings

Lawfulness of processing (Article 6)

Control objective:

Procedures and controls are established to ensure that personal data are only processed lawfully.

<i>Data processor's control activity</i>	<i>Test performed by controller</i>	<i>Result of controllers test</i>
<p>An agreement has been approved by the data controller which requires that personal data may be processed only where there is a legitimate basis.</p> <p>The data processing agreement also contains a summary of the basis on which the processing of personal data is carried out and any data processing instructions made by the data controller.</p> <p>If the Sentia receives instructions from the data controller, such instructions are subject to Sentia's change management procedure vis-a-vis the data controller.</p> <p>In addition, data controller instructions are also kept visible to the data processor's employees in its systems.</p>	<p>Inspected that there are updated written procedures for processing of personal data that contain requirements for the lawful processing of personal data.</p>	<p>No exceptions noted.</p>
<p>Sentia Denmark A/S follows up - at least annually – on the data processing agreement between the data controller and Sentia, including updating of the basis for processing personal data.</p>	<p>Inspected documentation of the basis on which processing of personal data is carried out and that this is approved by the data controller at least annual</p>	<p>No exceptions noted.</p>
<p>There is a regular – at least annual – assessment that there has been no unlawful processing of personal data and this assessment is documented.</p>	<p>Inspected documentation of regular – at least annual – assessment that there is no and has been no unlawful processing of personal data.</p>	<p>No exceptions noted.</p>

4. Control objectives, controls, tests and related findings

Lawfulness of processing (Article 6) - continued

Control objective:

Procedures and controls are established to ensure that personal data are only processed lawfully.

<i>Data processor's control activity</i>	<i>Test performed by controller</i>	<i>Result of controllers test</i>
Management has dealt with and approved the assessment of whether there has been any unlawful processing of personal data.	Inspected documentation of management's approval of the assessment of whether there has been any unlawful processing of personal data.	No exceptions noted.

4. Control objectives, controls, tests and related findings

Processing of special categories of personal data (Articles 9 and 10)

Control objective:

Procedures and controls are established to ensure that the processing of special categories of personal data only takes place with consideration to established criteria conditions and the appropriate safeguards.

<i>Data processor's control activity</i>	<i>Test performed by controller</i>	<i>Result of controllers test</i>
<p>Sentia's privacy policy sets out that the processing of special categories of personal data must only take place at the processor if the criteria for processing specifically agreed with the individual data controller.</p> <p>Regular – at least annual – assessments are carried out of whether the procedures need to be updated.</p>	<p>Inspected that updated written procedures exist where it is decided that the processing of special categories of personal data at the processor must only take place if the criteria for processing is specifically agreed with the data controller.</p>	<p>No exceptions noted.</p>
<p>There is a data processor agreement or suchlike approved by the data controller that contains an updated statement of the basis on which the processing of special categories of personal data is carried out.</p>	<p>Inspected documentation that the processing of special categories of personal data is carried out on the basis approved by the data controller.</p>	<p>No exceptions noted.</p>
<p>Sentia Denmark A/S follows up - at least annually – follows up on the data processing agreement between the data controller and Sentia, including updating of the basis for processing special categories of personal data.</p>	<p>Inspected documentation stating that the basis for processing special categories of personal data is updated and approved by the data controller at least once a year</p>	<p>No exceptions noted.</p>
<p>Management has dealt with and approved the assessment of compliance with the principles related to processing of special categories of personal data.</p>	<p>Inspected documentation of management's approval of the assessment of compliance with the principles for processing of special categories of personal data.</p>	<p>No exceptions noted.</p>

4. Control objectives, controls, tests and related findings

Right to restriction of processing (Articles 18 and 19)

Control objective:

Procedures and controls has been established to ensure that the data subject's right to restriction of processing of his own registered personal data is complied with, including restriction of processing at recipients of the personal data.

<i>Data processor's control activity</i>	<i>Test performed by controller</i>	<i>Result of controllers test</i>
The data controller has approved a data processing agreement which sets out the handling of data subjects' rights to restrict the processing of personal data and how Sentia can assist the controller in doing so.	Inspected that there are updated written procedures for the handling of data subjects' right to restriction of processing of personal data.	No exceptions noted.
Technical measures agreed for the IT systems used have been established in accordance with the customer's instructions. The technical measures ensure that the processing of personal data can be restricted.	Inspected documentation that technical measures have been established in the IT systems used in order to restrict the processing of personal data. Inspected documentation that personal data are only restricted by means of the established technical measures.	No exceptions noted.
There is a regular – at least annual – assessment that the restriction of processing of personal data takes place correctly and without undue delay.	Inspected documentation that the restriction of processing of personal data has taken place correctly and without undue delay.	No exceptions noted.
Management has dealt with and approved the assessment that the restriction of personal data has taken place correctly and without undue delay.	Inspected documentation that management has ensured that the restriction of processing of personal data has taken place correctly and without undue delay.	No exceptions noted.

4. Control objectives, controls, tests and related findings

Responsibility of the data controller – implementation of appropriate data protection (Article 24)

Control objective:

Procedures and controls has been established to ensure that technical and organizational measures for safeguarding the rights of the data subject and the processing of personal data function in accordance with the data controller's guidance.

<i>Data processor's control activity</i>	<i>Test performed by controller</i>	<i>Result of controllers test</i>
Sentia Denmark A/S has received instructions for the processing and protection of personal data from the controllers.	Inspected documentation that the data controller has given the processor instructions on the processing and protection of personal data.	No exceptions noted.
Sentia Denmark A/S has general written procedures, including a description of the technical and organizational measures to safeguard the data subject's rights and the processing of personal data, which are approved by the data controller.	Inspected documentation that the data controller has approved the processor's general written procedures, including technical and organizational measures to safeguard the data subject's rights and the processing of personal data.	No exceptions noted.
Sentia Denmark A/S has a description of the use of other processors, including a description of the other processors' technical and organizational measures to safeguard the data subject's rights and the processing of personal data, which are approved by the data controller.	Inspected documentation that the data controller has approved the processor's other processors, including their technical and organizational measures to safeguard the data subject's rights and the processing of personal data.	No exceptions noted.
Sentia has entered into a data processing agreement with the sub-suppliers engaged for the operating services supplied.		
There is a regular – at least annual – assessment that the safeguarding of the rights of the data subject and the processing of personal data have taken place in accordance with the instructions from the data controller and the approved procedures.	Inspected documentation of control that the safeguarding of the rights of the data subject and the processing of personal data have taken place in accordance with the instructions and approved procedures.	No exceptions noted.

4. Control objectives, controls, tests and related findings

Responsibility of the data controller – implementation of appropriate data protection (Article 24) - continued

Control objective:

Procedures and controls has been established to ensure that technical and organizational measures for safeguarding the rights of the data subject and the processing of personal data function in accordance with the data controller's guidance.

<i>Data processor's control activity</i>	<i>Test performed by controller</i>	<i>Result of controllers test</i>
Management has dealt with and approved the assessment that the safeguarding of the rights of the data subject and the processing of personal data have taken place in accordance with the instructions from the data controller and the approved procedures.	Inspected documentation that management has ensured that the safeguarding of the rights of the data subject and the processing of personal data have taken place in accordance with the instructions from the data controller and the approved procedures.	No exceptions noted.

4. Control objectives, controls, tests and related findings

Processor – processing of personal data under the authority of the data controller (Articles 28 and 29)

Control objective:

Compliance with procedures that ensure that the processing of personal data only takes place in accordance with a contract or other legally binding document (data processor agreement) and that data processing is only carried out by processors approved by the data controller.

<i>Data processor's control activity</i>	<i>Test performed by controller</i>	<i>Result of controllers test</i>
A contract or other legally binding document (data processor agreement) has been entered into between processor and data controller, which describes the technical and organizational security measures Sentia has established so that the data processing fulfils the requirements in the Data Protection Regulation and Data Protection Act and ensures protection of the rights of the data subject.	Inspected documentation that the data processor agreement describes the technical and organizational security measures the processor has established so that the data processing fulfils the requirements in the Data Protection Regulation and Data Protection Act and ensures protection of the rights of the data subject.	No exceptions noted.
Sentia Denmark A/S has received authorisation from the data controller to use other processors for the operating services delivered.	Inspected documentation that the data controller has authorised the use of other processors. Inspected documentation that intended changes concerning the addition or replacement of other processors have taken place following notification to the data controller.	No exceptions noted.
Sentia Denmark A/S has received the data controller's instructions for the processing and protection of personal data from the data controller.	Inspected documentation that the data controller has given the processor instructions on the processing and protection of personal data.	No exceptions noted.
Sentia Denmark A/S has written procedures describing that only the processor may process personal data, including transferring personal data to a third country or international organisation, in accordance with documented instructions from the data controller in relation to European Union law or national law.	Inspected that there are updated written procedures that only the processor may process and transfer personal data in accordance with documented instructions from the data controller or pursuant to European Union law or national law.	No exceptions noted.
A regular – at least annual – assessment is carried out of whether the procedures need to be updated.		

4. Control objectives, controls, tests and related findings

Processor – processing of personal data under the authority of the data controller (Articles 28 and 29) - continued

Control objective:

Compliance with procedures that ensure that the processing of personal data only takes place in accordance with a contract or other legally binding document (data processor agreement) and that data processing is only carried out by processors approved by the data controller.

<i>Data processor's control activity</i>	<i>Test performed by controller</i>	<i>Result of controllers test</i>
<p>There are written procedures describing that Sentia Denmark A/S will ensure that the persons authorised to process personal data have committed themselves to confidentiality or are under an appropriate statutory obligation of confidentiality.</p> <p>A regular – at least annual – assessment is carried out of whether the procedures need to be updated.</p>	<p>Inspected that there are updated written procedures describing that the persons authorised to process personal data have committed themselves to confidentiality or are under an appropriate statutory obligation of confidentiality.</p>	<p>No exceptions noted.</p>
<p>Employees of Sentia Denmark A/S and sub-processors are instructed in processing personal data in accordance with the instructions of the data controller.</p>	<p>Inspected documentation stating that employees and sub-processors are instructed in the processing of personal data in accordance with the instructions of the data controller.</p>	<p>No exceptions noted.</p>
<p>There are written procedures describing how Sentia Denmark A/S assists the data controller as far as possible with fulfilling the data controller's obligation to respond to requests to exercise the data subjects' rights by means of appropriate technical and organizational measures.</p> <p>A regular – at least annual – assessment is carried out of whether the procedures need to be updated.</p>	<p>Inspected that there are updated written procedures describing how the processor assists the data controller with fulfilling the data controller's obligation to respond to requests to exercise the data subjects' rights by means of appropriate technical and organizational measures.</p>	<p>No exceptions noted.</p>

4. Control objectives, controls, tests and related findings

Processor – processing of personal data under the authority of the data controller (Articles 28 and 29) - continued

Control objective:

Compliance with procedures that ensure that the processing of personal data only takes place in accordance with a contract or other legally binding document (data processor agreement) and that data processing is only carried out by processors approved by the data controller.

<i>Data processor's control activity</i>	<i>Test performed by controller</i>	<i>Result of controllers test</i>
<p>Written procedures state how, to the extent possible, Sentia Denmark A/S is to assist the data controller in performing his or her obligation to respond to requests relating to the exercise of the data subjects' rights by means of appropriate technical and organizational measures.</p> <p>On a continuous basis – and at least once a year – it will be assessed whether to update these procedures.</p>	<p>Inspected whether written procedures state how the data processor is to assist the data controller in performing his or her obligation to respond to requests relating to the exercise of the data subjects' rights by means of appropriate technical and organizational measures.</p>	<p>No exceptions noted.</p>
<p>There are written procedures describing how Sentia Denmark A/S can –taking into account the nature of the processing and the controller in complying with the data controller's obligations in relation to:</p> <ul style="list-style-type: none"> • Security of processing (Article 32) • Notification of a personal data breach to the supervisory authority (Article 33) • Communication of a personal data breach to the data subject (Article 34) • Data protection impact assessment (Article 35) • Prior consultation (Article 36) <p>A regular – at least annual – assessment is carried out of whether the procedures need to be updated.</p>	<p>Inspected that there are updated written procedures describing how the processor assists the data controller with ensuring compliance with the data controller's obligations.</p>	<p>No exceptions noted.</p>

4. Control objectives, controls, tests and related findings

Processor – processing of personal data under the authority of the data controller (Articles 28 and 29) - continued

Control objective:

Compliance with procedures that ensure that the processing of personal data only takes place in accordance with a contract or other legally binding document (data processor agreement) and that data processing is only carried out by processors approved by the data controller.

<i>Data processor's control activity</i>	<i>Test performed by controller</i>	<i>Result of controllers test</i>
<p>There are written procedures describing how Sentia Denmark A/S, at the choice of the data controller, erases or returns all the personal data to the data controller after the end of the provision of services relating to processing, and erases existing copies unless European Union or Member State law requires storage of the personal data.</p> <p>A regular – at least annual – assessment is carried out of whether the procedures need to be updated.</p>	<p>Inspected that there are updated written procedures describing how the processor, at the choice of the data controller, erases or returns all the personal data to the data controller after the end of the provision of services relating to processing, and erases existing copies.</p>	<p>No exceptions noted.</p>
<p>There are written procedures describing how Sentia Denmark A/S makes all information necessary available in order to demonstrate compliance with the requirements for the processor available to the data controller and allows for and contributes to audits, inspections etc. conducted by the data controller or another auditor mandated by the data controller.</p> <p>A regular – at least annual – assessment is carried out of whether the procedures need to be updated.</p>	<p>Inspected that there are updated written procedures describing how the processor makes available to the data controller all information necessary in order to demonstrate compliance with the requirements for the processor and allows for and contributes to audits, inspections etc. conducted by the data controller or another auditor mandated by the data controller.</p>	<p>No exceptions noted.</p>
<p>Management has dealt with and approved the assessment of compliance with the technical and organizational security measures and data protection and that the processing of personal data has taken place in accordance with instructions from the data controller.</p>	<p>Inspected documentation that management has approved the assessment of compliance with the technical and organizational security measures and data protection and that the processing of personal data have taken place in accordance with instructions from the data controller.</p>	<p>No exceptions noted.</p>

4. Control objectives, controls, tests and related findings

Records of processing activities (Article 30)

Control objective:

Procedures and controls has been established to ensure that the processor maintains a record of categories of processing activities conducted on behalf of the data controllers.

<i>Data processor's control activity</i>	<i>Test performed by controller</i>	<i>Result of controllers test</i>
<p>At Sentia, there is a record of categories of processing activities for each data controller, which contains:</p> <ul style="list-style-type: none"> the name and contact details of the processor for each data controller and, where applicable, the data controller's data protection officer the categories of processing carried out on behalf of each data controller a general description of the technical and organizational security measures. 	<p>Inspected documentation that there is a record of categories of processing activities for each data controller, stating the necessary information.</p>	<p>No exceptions noted.</p>
<p>On a continuous basis – and at least once a year – it is assessed whether the record of categories of processing activities for each data controller is to be updated and correct.</p>	<p>Inspected documentation that the list of categories of processing activities for each data controller is updated and correct.</p>	<p>No exceptions noted.</p>

4. Control objectives, controls, tests and related findings

Security of processing (Article 32)

Control objective:

Procedures and controls has been established to ensure that, based on a risk assessment, appropriate technical and organizational security measures have been taken against accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data.

<i>Data processor's control activity</i>	<i>Test performed by controller</i>	<i>Result of controllers test</i>
Sentia Denmark A/S has carried out an independent risk assessment of the processing of personal data for each data controller.	Inspected documentation that an independent risk assessment of the processing of personal data for each data controller has been carried out.	No exceptions noted.
A regular – at least annual – assessment is carried out of whether the risk assessment is updated and appropriate.	Inspected documentation that the processor's risk assessment is updated and appropriate.	No exceptions noted.
Management has dealt with and approved the risk assessments.	Inspected documentation that the data controller has given the processor instructions on the processing and protection of personal data.	No exceptions noted.
Sentia Denmark A/S has established appropriate technical and organizational security measures to ensure a security level that is appropriate to the risks identified in connection with the risk assessment.	Inspected documentation stating that appropriate technical and organizational security measures have been established, ensuring a security level that is appropriate to the risks identified in connection with the data processor's risk assessment. Inspected documentation stating that the established technical and organizational security measures have been efficient during the report period.	No exceptions noted.
The technical and organizational security measures established by Sentia Denmark A/S have been approved by the data controller through the approval of a joint data processing agreement.	Inspected documentation stating that the data controller has approved the established technical and organizational security measures.	No exceptions noted.

4. Control objectives, controls, tests and related findings

Security of processing (Article 32) – continued

Control objective:

Procedures and controls has been established to ensure that, based on a risk assessment, appropriate technical and organizational security measures have been taken against accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data.

<i>Data processor's control activity</i>	<i>Test performed by controller</i>	<i>Result of controllers test</i>
On a continuous basis – and at least once a year – it is assessed whether the technical and organizational security measures cover the risks identified in connection with the updating of Sentia Denmark A/S' risk assessment.	Inspected documentation stating that the technical and organizational security measures ensure a level of safety that is appropriate to the risks identified in connection with the updating of the data processor's risk assessment.	No exceptions noted.
Employees of Sentia Denmark A/S and sub-processors are instructed in processing personal data in accordance with the instructions of the data controller.	Inspected documentation stating that employees and sub-processors are instructed in the processing of personal data in accordance with the instructions of the data controller.	No exceptions noted.
Management has dealt with and approved the established technical and organizational security measures.	Inspected documentation that management has dealt with and approved the established technical and organizational security measures.	No exceptions noted.

4. Control objectives, controls, tests and related findings

Notification of a personal data breach to the supervisory authority (Articles 33 and 34)

Control objective:

Procedures and controls has been established to ensure that the processor can, in the event of a personal data breach, support the data controller's obligation to satisfactorily notify the supervisory authority in a timely fashion and communicate to the data subjects if personal data are covered by the breach.

<i>Data processor's control activity</i>	<i>Test performed by controller</i>	<i>Result of controllers test</i>
Sentia Denmark A/S has written procedures describing the handling of personal data breaches, including communication to the data controller in a timely manner. A regular – at least annual – assessment is carried out of whether the procedures need to be updated.	Inspected that there are updated written procedures for handling personal data breaches, including a description of communication to the data controller.	No exceptions noted.
Sentia Denmark A/S ensures the recording of all personal data breaches.	Inspected documentation that all personal data breaches are recorded by the processor.	No exceptions noted.
Sentia Denmark A/S sends documentation comprising, as a minimum, the facts relating to the breach, its effects and the remedial action taken to the data controller.	Inspected documentation that the processor has sent documentation comprising, as a minimum, the facts relating to the breach, its effects and the remedial action taken to the data controller.	No exceptions noted.
Management has ensured that personal data breaches are communicated satisfactorily to the data controller in a timely manner.	Inspected documentation that management has ensured that all personal data breaches are communicated satisfactorily to the data controller in a timely manner.	No exceptions noted.



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Tony Jensen Trolle

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