

Desistuation	Durnage		Consequences withdrawing	Cotocomu data	Category involved	Coto comu no columna	Detention nevied	Security
Registration	Purpose	Legal base	consent	- name and address	parties	Category receivers	Retention period	Security
				details				- access list
				- contact information	- clients			- locally hosted system
				- payment details	- suppliers			- login required
	- Recording client orders			- IP addresses	- prospects	- employees		- messages to relations or internally
	- Recording orders to			- URI's	- employees	- clients (own data)		classified
Tickets	suppliers	Contract		- MAC-addresses	- clients' relations	- suppliers (own data)	No limitation ³	- TLS only
				- name and address				
				details				 locally hosted system
	Registration and			- contact information				- login required
	processing of complaints			- IP-addresses		- employees		- role-based access
Abuse registration	on abuse by clients	Contract		- URI's	clients	- clients (own data)	No limitation ⁴	- TLS only
				 name and address 				
				details				
				- IP addresses				
				- date				
				- time - duration				- encrypted file
CIOT registration	Legal provision of data	Legal obligation		- email addresses	clients	СІОТ	None	- TLS only
				- name and address	clients		None	
				details	- clients			
				- contact information	- suppliers			- access list
				- payment details	- prospects	- employees		- locally hosted system
				- IP addresses	- employees	- clients (own data)		- login required
	Mail communication on			- URI's	- clients' relations	- suppliers (own data)		- role-based access to mailboxes
Role based email	role-addresses of BIT	Contract		- MAC addresses	- third parties	- third parties ²	No limitation 5	- TLS only
				- name and address				
				details	- clients			
				 contact information 	- suppliers			
				- payment details	- prospects	- employees		 locally hosted system
	Personal/direct mail			- IP addresses	- employees	- clients (own data)		- login required
	communication of BIT			- URI's	 clients' relations 	- suppliers (own data)		- encryption for confidential information
Mailbox employees	employees	Contract		- MAC addresses	- third parties	- third parties ²	No limitation 5	- TLS only
					- clients			
		- Contract (for			- suppliers			- access list
		clients/suppliers)		- name and address	- prospects			- locally hosted system
		- Consent (for		details	- employees	- employees		- login required
	Registration contact	employees, prospects		- contact information	- clients' relations	- clients (own data)		- role-based access
Relation management	information	and relations)		- payment details	- suppliers' relations	- suppliers (own data)	No limitation 6	- TLS only
								pagage list
								- access list - locally hosted system
				- name and address				- login required
				details		1		- messages to relations or internally
	Registration use of IP			- IP addresses		- employees	Duration of	classified



Camera images	Security of access	Legitimate interest, meaning security of the property and data of clients and BIT		Personal, external characteristics	Visitors BIT premises and grounds	employees	8 days	 access list internally hosted system login required for viewing of images
Biometric access	Security of access	Contract		Biometric data	visitors BIT premises with independent access	employees	Duration of service	- access list - internally hosted system - login required - role-based access
ANPR	Security of access	Consent (with identification of known number plates) Legitimate interest, meaning recognition of known number plates only possible by scanning all number plates	If there is no consent for processing the number plate, the user of the number plate cannot pass the gates on the grounds of BIT without access pass or use of the intercom.	 pictures of cars logging of number plate, time and location identification of visitor based on known number plates 	visitors BIT grounds with car	employees	2 years	- access list - internally hosted system - login required - role-based access
Access control system	Security of access	Contract		 logging of name, time and location identification of persons based on access pass or biometric data 	visitors premises of BIT with independent access	employees	1 year	- access list - internally hosted system - login required - role-based access
Access registration	Security of access	Contract		 name of registered person number plate of registered person proof of identification from registered person company name date, time, duration and location of registration name of notifier 	visitors premises and grounds of BIT	- employees - clients (<i>data about own</i> <i>company</i>)	Current year plus previous year	- access list - login required - locally hosted system - role-based access - TLS only
Phone conversations	Registration communication	Legitimate interest, meaning providing the opportunity to resume and the opportunity to remove possible doubt about unclear orders		 name phone number audio recording (only outside office hours) date, time and duration of conversation 	 people calling to BIT people receiving calls from BIT 	employees	1 month	- access list - login required - locally hosted system - role-based access - TLS only
Staff files	Staff administration	Legal obligation		 name and address details salary data assessments 	employees	- employees administration - accountant (<i>salary data</i>) - management	- duration labour agreement, plus 3 months - information	 closed cabinet in secured room login required for software locally hosted system TLS only



				- copy ID - police clearance				
				certificate - labour agreement - copy diplomas		- tax authority (<i>salary data</i>)	relevant for wage tax 7 years	
Job applications	Recruitment	Consent	If there is no consent for the processing of personal data, the application cannot accepted.	- NAW - job history - education - several personal data	Job applicants	Management	6 months or 4 months after rounding up application procedure, which ever comes first	 locally hosted system (via email) login required (via email) encryption for confidential information (via email) TLS only (via email)
Billing	Billing	Legal obligation		 name and address details payment details specification products and services 	Clients	- employees - clients - debt collection agency - accountant	7 years	 TLS preferred mailing sent in closed envelopes (to customers) to debt collection agency via webportal with TLS locally hosted system with access list, login required, role-based access, TLS only
Mechanics registration	- Security of access - Recording awareness BIT house rules	Consent	If there is no consent for the processing of personal data, no work can be done at BIT.	- name - company name - contact information - ID number - if relevant: enforced sanctions	Employees of suppliers	Employees	No limitation ⁷	Cabinet in secured room
Websites	- Securing personal data (at BIT websites behind a login) - Collecting visitor statistics (all BIT websites)	Consent (for websites behind login) Legitimate interest, meaning guaranteeing proper functioning of the service	If there is no consent for the processing of the login credentials, the personal data cannot be accessed.	- IP address - referrer - browser details - login credentials	Visitors	- employees - clients (<i>own login</i> <i>credentials</i>)	- 7 days (logs) - no limitation (gathered statistics)	- access list - locally hosted system - login required - role-based access - TLS only
Mailing services	 Securing personal data (with access to mailing services) Collecting logging for problem solving 	Contract (with login mailing service) Legitimate interest, meaning guaranteeing proper functioning of the service		- IP addresses of sender, addressee and reader - email addresses of sender and receiver - login credentials	- users of the mailing service - third parties	- employees - clients (<i>own login</i> credentials)	7 days	- access list - locally hosted system - login required - role-based access - TLS only
Webhosting	 Securing personal data (with access to hosing service) Collecting logging for problem solving 	Contract (with login hosting service) Legitimate interest, meaning guaranteeing proper functioning of the service		- IP address - referrer - browser details - login credentials	visitors	- employees - clients (own login credentials and logging own websites)	- 7 days (<i>logs</i>) - no limitation (<i>gathered</i> <i>statistics</i>)	 access list locally hosted system login required role-based access TLS only



	- Collecting visitor statistics						
VOIP	- Billing - Insight calling history	Legal obligation	- phone number - date, time and duration of call	- people calling a client - people receiving a call from a client	- employees - clients <i>(own data)</i> - VOIP supplier	1 year	- access list - locally hosted system - login required - role-based access - TLS only
Internet access on client location	Providing service	Contract	 name and address details contact information VLAN number client number (for mobile internet) login credentials 	Clients	- employees - provider infrastructure	- duration of service - no limitation ⁷	 access list locally hosted system login required role-based access TLS only TLS preferred email (<i>for mobile internet</i>)
Software distribution	Providing service	Contract	- name and address details - contact information - license information	- clients - resellers	- employees - clients - vendors - resellers	No limitation ⁷	 - access list - locally hosted system - login required - role-based access - TLS only - TLS preferred email (to vendors and resellers)
Software-/hardware distribution Untangle	Providing service	Contract	 name and address details contact information license information creditcard information 	- clients - resellers	- employees - clients - resellers - Untangle established in the United States - Stripe established in the United States	No limitation ⁷	 access list locally hosted system login required role-based access TLS only TLS preferred email (<i>to vendors and resellers</i>)
SSL certificates	Providing service	Contract	 name and address details contact information private key host names 	Clients	- employees - clients (<i>own data</i>) - certificate authorities - reseller CA	No limitation ⁷	- access list - locally hosted system - login required - role-based access - TLS only



- 1. This column describes the consequence of not giving permission to process the personal data.
- 2. Third parties have access to this data if the client has requested for them to be added to email communication as receivers.
- 3. BIT does not (yet) have the proper classification on tickets that can discern between tickets that need to be stored for legal reasons or in the interest of the client and tickets that do not have such reasons. Additionally, in some cases the data of multiple relations is placed in one ticket (which can only be accessed by BIT employees) instead of the ticket being linked to a specific relation.
- 4. IP addresses change user and abuse history of an IP address is of importance for certain uses. It is therefore in the interest of a potential new user of the IP address to know the history of the IP address.
- 5. BIT does not (yet) have the proper classification on emails that can discern between emails that need to be stored for legal reasons or in the interest of the client and emails that do not have such reasons. Additionally, individual emails are not systematically linked to a specific relation. In some cases, the data of multiple relations is placed in one email (which can only be accessed by BIT employees).
- 6. Personal data of individuals with clients that we are no longer servicing, are removed after the termination of all contracts.
- 7. This personal data is stored in tickets and emails. See notes 3 and 5 for the lack of limitation in the retention period for this data.