



## Risk assessment carried out in relation to the latest EU judgment (Schrems II).

Updated 09.10.2020

Based on the Schrems II ruling, we have conducted a revised risk assessment of our personal data processing by data processors and sub-processors in the United States.

Plandisc respects all requests for confidentiality of personal information submitted online, and we are aware of the need for appropriate protection and proper processing of all personal information that we receive.

### **We primarily distinguish between three types of data:**

1. Content data (information placed in the year wheel). Eg. attachments in Plandisc, text written by the user in the description field.
2. Data on the user of Plandisc - general contact information. Eg. Name, Email and phone number.
3. Web browser history in the Plandisc tool: E.g. Clicks on 'change color' and clicks on 'print A4.'

### **Regarding type 1:**

The customer is the data controller for content data entered into the Plandisc – the year wheel, and Plandisc is the data processor. Customer Content Data is stored by Microsoft Azure on servers in Ireland. All content data is therefore stored within the EU, ie. content data is not stored in the United States. Read more about Microsoft Azure Security here, including information about encryption. Backup of this data on Microsoft Azure is done on Amazon Webservices - Ireland.

### **Regarding type 2 and 3:**

Plandisc is the data controller for information covered by points 2 and 3, ie. information related to user profiles in Plandisc. Some of this information is stored by our data processors in the United States. The transfer and processing of this information takes place on the basis of the European Commission's Standard Contractual Clauses.

It is our assessment that the personal data is adequately secured by the use of Standard Contractual Clauses, especially with regard to the type of personal data covered by the transfer. In addition, Plandisc has, through receipt of transparency reports, pseudonymization, and short deletion deadline secured further secured the information.

Do not hesitate to contact us for further informations or see our list of sub-processors.