

# **Audit report\***

## **Implementation of technical and organizational measures**

### **Usercentrics GmbH**

Conducted by:

Peter Camehl

SECUWING GmbH & Co. KG

For:

Usercentrics GmbH ("Client")

Date: August 14, 2023

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Confidentiality: internal

\*This is a translated copy for a better understanding as the original Audit signed by the Auditor is in German.

# 1. Aim and purpose of the audit

Verification of the implementation of and compliance with the technical and organizational measures provided for in the Data Processing Agreement.

## 2. Audit methods

In order to prepare the audit, the auditor has requested and received relevant guidelines for the implementation of the technical and organizational measures from Usercentrics GmbH.

Furthermore, an on-site inspection of the office and business premises of Usercentrics GmbH took place on August 9, 2023. During the on-site inspection, an IT employee, the Director of Legal, Compliance & Data Privacy and a Senior Legal Counsel employee were interviewed.

During the on-site audit, a list of questions was used as the basis for the audit to compare the actual state with the target state according to the General Data Protection Regulation (GDPR) and the German Bundesdatenschutzgesetz (BDSG).

## 3. Scope of the audit

The following areas were audited on the basis of the question list.

### 1. Confidentiality

#### Physical Access control

##### **Assessment:**

The access control measures undertaken are well implemented with regards to the protection requirements of the processed data.

#### Electronic Access control

##### **Assessment:**

The access control measures undertaken are well implemented with regards to the protection requirements of the processed data.

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### **Internal Access control**

#### **Assessment:**

The access control measures undertaken are well implemented with regards to the protection requirements of the processed data.

### **Separation**

#### **Assessment:**

The measures undertaken to separate data are sufficient with regards to the protection requirements of the processed data.

### **Pseudonymization and encryption**

#### **Assessment:**

The measures undertaken meet the requirements with regards to the required protection of the processed data.

## **2. Integrity**

### **Input control**

#### **Assessment:**

The input control measures undertaken are sufficient with regards to the required protection of the processed data.

### **Transfer control**

#### **Assessment:**

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The measures undertaken to control transfers are sufficient with regards to the required protection of the processed data.

### **3. Availability and resilience**

#### **Assessment:**

The measures undertaken to ensure the availability and resilience of the systems are sufficient with regards to the required protection of the processed data.

### **4. Procedure for regular reviews, assessments and evaluations**

#### **Assessment:**

The measures undertaken meet the requirements and promote data privacy compliance.

#### **Order control**

#### **Assessment:**

The contract control measures undertaken are sufficient with regards to the required protection of the processed data.

#### **Privacy by Design and Privacy by Default**

#### **Assessment:**

The measures undertaken for "Privacy by Design" and "Privacy by Default" meet the requirements and are sufficient with regards to the processed data.

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## 4. Summary

The essential requirements of the General Data Protection Regulation (GDPR) and the German Bundesdatenschutzgesetz (BDSG), in particular the technical and organizational measures in accordance with the annex to the Data Processing Agreement, are in compliance.

The ISMS already implemented in accordance with TISAX and ISO 27001 is beneficial in this context.

There were no notable deviations of the processing from the target state.

Overall, it can be stated that the technical and organizational measures at Usercentrics GmbH are implemented in a manner that complies with the requirements of the GDPR.

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