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## "Privacy by design" - a concept fully adopted by Cention

This document is only a guide line on Cention's intention to always strive to develop our software in accordance to the rising regulations of integrity and personal data. We follow regulations thoroughly hence Cention will make sure to comply from a technical prospective.

Cention adopted the "Privacy by design" concept many years ago as we understand our customers need to protect their data and comply with expectations and regulations regarding safe keeping of your customer data. Especially when it comes to the personal data that you might collect from your customers.

## What is "Privacy by design"?

Cention follows the international concept "Privacy by design" developing our service to secures that your data is stored according to the regulations.

As a customer we recommend that you will investigate how regulations might impact your business and your processes for handling of for example personal data.

Cention strive to secure your data both with technical solutions and with policies for our personnel that have access to any environment that includes data access.

For the software we work with different access levels to make it possible for our customers to more decide who should be able to access certain functions and who should not. When logging into Cention these rights will be applied hence the system offers different functionality and depth depending on who is logging in.

Our service uses encrypted communication per default (SSL) and do support both access control through IP-range and VPN. The two later are additional services whereas SSL is a part of our standard offer.

We log everything that is happening in the system that has an impact on your data. These logs can be used to investigate if any wrongdoings are suspected.

As mention above we work with strict access control policies for Cention's employees with access to our hosting (i.e. our system administrators and to some extent our technical support). We emphasize that our customers also have a clear policy for their employees access including passwords and removal of access should any employee change to another position or leave the company/organization. The policy should also cover guide lines on how the data that anyone can access is allowed to be used.

Cention has tools for automatic deletion of data after a certain timespan and we also provide services for deletion of specific data that our customers might want to delete from time to time as one of the directives active in many jurisdictions is that data should only be saved for as long as it is of benefit, especially personal data that has special regulations to take in consideration.

If you have any questions in regards to this, please do not hesitate to contact us on legal@cention.com