

## DATA PRIVACY AT WORKPATH

WORKPATH

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What personal data does Workpath process for its Customers?

We process a very limited scope of personal data in order to provide you with the agreed Services:

- First and last name as well as email address of Customer's employees, contractors and consultants using the Services, and
- potentially other personal data entered by your employees into the Services.
- Where does Workpath process its Customers' personal data?

We process all Customer Data solely in Germany and Ireland.

What specific technical and organizational security measures did Workpath implement in order to secure its Customers' personal data?

Please find all details in our "Security Addendum" located at: <a href="https://www.workpath.com/privacy">https://www.workpath.com/privacy</a>, which is also part of our Data Processing Addendum.

For more information reach out to

trust@workpath.com
https://www.workpath.com/



What additional data protection safeguards did Workpath implement?

We use encryption technologies when transferring and storing personal data provided by you as Data Controller. Please find more information about our robust information security program on our Workpath Trust Website: <a href="https://www.workpath.com/trust">https://www.workpath.com/trust</a>.

In addition, we ask our sub-processors to implement and offer additional data protection safeguards compliant with the recommendations of the European Data Protection Board.

Is Workpath a Sub-processor for your data?

Yes. We process personal data provided by you as Data Controller on behalf of your organization - hence, Workpath acts as **Data Processor** (Art. 28f GDPR).

DoesWorkpath offer a data processing document?

Yes. We offer a "Data Processing Addendum" (also "DPA") to all of our customers, which is referenced in the Workpath Master Services Agreement.

You can find the current DPA in the privacy section of our Workpath Trust Website: https://www.workpath.com/privacy.

## FAQ

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How can Customers make sure they have a DPA in place with Workpath?

Our Master Services Agreement that governs all direct sales transactions is available at <a href="https://www.workpath.com/legal">https://www.workpath.com/legal</a> and implements the DPA by reference. Your sales contract with us therefore automatically includes a DPA.

You will find the DPA document in the privacy section of our Workpath Trust Website: https://www.workpath.com/privacy.

Does Workpath transfer any of the personal data processed to a country outside of the EU?

No, based on the latest agreements with our sub-processors, no personal data is regularly transferred and processed outside of the EU.

Does Workpath use any subprocessors in order to provide its Customers with the agreed Services?

Yes, we use a very limited number of vendors as sub-processors due to their leading expertise in some fields of technology. The latest sub-processor list is available in the privacy section of our Workpath Trust Website: <a href="https://www.workpath.com/">https://www.workpath.com/</a>
<a href="privacy">privacy</a>.</a>

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Where can I find a list of the sub-processors that Workpath uses in order to provide its Customers with the agreed Services?

The latest sub-processor list is available in the privacy section of our Workpath Trust Website: <a href="https://www.workpath.com/">https://www.workpath.com/</a> privacy.

Does Workpath have a formally appointed "Data Protection Officer"?

Yes, we have a formally appointed "Data Protection Officer" who can be reached at dpo@workpath.com.