Data Portability

Information required by Regulation (EU) 2023/2854 of the European Parliament and of the Council on harmonised rules on fair access to and use of data (Data Act) concerning the data processing service of Visma Sign.

Exportable and Non-exportable Data

Section (a) all categories of exportable data and digital assets that can be transferred during the switching process in accordance with Data Act and section (b) all categories of data specific to the functioning of the Service that are exempted from the previous list.

a) Exportable Data:

Transferable data is the data that the customer has generated or brought into the Visma Sign service in connection with its use. The data will be provided upon request in a structured, machine-readable format (e.g., JSON or CSV), if an independent export tool is not available.

- **Documents and Signed Agreements:** Original documents uploaded to the service, signature invitations sent, and signed agreements.
 - o Note: Documents are available for download in PDF format.
- **Signature Event Data:** As part of the signed agreements, information about the event itself, including:
 - **Data within the Signature Seal:** Information embedded in the signed agreement (e.g., timestamp).
- User Account Basic Data (Organizational Account): Basic data of the organization's users (e.g., name, email, role) and related access rights.
- **Digital Form Data:** Data collected through the service's digital forms.

b) Non-exportable Data:

This data is related to the internal operation of the service or is protected by the service provider's intellectual property rights and will not be disclosed.

- General System Logs: Technical logs related to the service operation, troubleshooting, and security that do not directly contain data generated by the customer.
- Service Settings and Configurations (General): General and default system settings.
- Internal Algorithms and Machine Learning Models: Methods and models used for service functionalities, such as data recognition or process optimisation.
- Data protected by the service provider's Intellectual Property Rights.

Known restrictions and technical limitations for exports of data

- **PDF Format Limitations:** Although signed documents and agreements can be downloaded in **PDF format**, PDF is not a machine-readable file format, which may affect the further utilisation of the data in another system.
- Manual Delivery: The transfer of some transferable data (such as user account details and detailed transaction logs) requires manual delivery via customer support upon request in a machine-readable format (CSV/JSON).

How Data is exported

The customer can independently download and export transferable data directly from the Visma Sign system according to the functionalities provided by the Service.

- **Documents and Signed Agreements:** Available for download in PDF format from the electronic archive.
- User Account Data and Event Data: Data will be provided upon request in a
 machine-readable and structured format (CSV/JSON) via customer support, if
 independent export is not possible within the Service.
- If the customer encounters problems with data export or requests material in a machine-readable format, support can be contacted by email at tuki.sign@visma.com or through other channels.

Subcontractors

Up-to-date information on our subcontractors and their locations is available in the <u>Visma</u> Trust Centre.

APIs

We provide online documentation for our service's APIs, which enables customers to use the service in conjunction with other cloud services they use

Disclosure of Data to Authorities

The police and other authorities may request access to information from us. This can include both personal and non-personal data.

In all such cases, we follow strict internal policies and procedures for assessing the access request, and confer with legal counsels. We only share information that is strictly required by law, and we only share information on the basis of valid court orders or similar legal documents.

To prevent unauthorised access to any information we hold, we also implement technical measures such as encryption and access controls. The Visma Security Program ensures high security standards and confidentiality.

Furthermore, we ensure legal obligations in contracts with our subcontractors that ensure they too enact organisational and security measures similar to ours.

If we receive access requests from non-EEA authorities, we ensure our compliance with the Data Act article 32. Internal policies and routines are in compliance with this regulation.