

Short Public Report

5 **1. Name and version of the IT-based service**

Registry Information Service on European Residents
(herein after referred to as „RISER-Service“, December 2010)

2. Manufacturer or vendor of the IT product / Provider of the IT-based service

10 Company Name:

RISER ID Services GmbH

Address:

Charlottenstraße 79/80
10117 Berlin (DE)

15 Contact Person:

Hendrik Tamm

3. Time frame of evaluation

August until December 2010

4. EuroPriSe Experts who evaluated the IT product or IT-based service

Name of the Legal/ Technical Expert:

5 Prof. Dr. Friedrich Holl

Address of the Legal/ Technical Expert:

Hektorstraße 7

10711 Berlin

Germany

10 5. Certification Body

Name: Unabhaengiges Landeszentrum fuer Datenschutz - ULD

Address: Holstenstr. 98

24103 Kiel

Germany

15 eMail: euoprise@datenschutzzentrum.de

6. Specification of Target of Evaluation (ToE)

Components related to the service:

- RISER Internal Client (**Purpose:** System-, Customer- and Supplier Management),
- 20 • RISER Customer-Portal (**Purpose:** Admission to the RISER-System, self administration of access, submitting queries and retrieval of results),
- RISER Supplier-Portal (**Purpose:** Batch-access to the RISER-System, to retrieve requests and to forward on or upload results),
- RISER Registration-Authorities-Portal (**Purpose:** online-access to the RISER-System, self administration of access, retrieve requests and forward on or upload results)
- 25 • Interfaces with customers and suppliers via SFTP, SOAP, FTP over SSL (FTPS), RISER Registration-Authorities-Portal, RISER Supplier-Portal, Postal (Mail), floppy disk, city portals in order to transmit requests and results.
- Loggings as the responsible body of data processing
- 30 • Role-concept.

Processes related to the service:

- Processes for processing, storage and deletion of personal data by the RISER-Service (**Purpose:** Processing within the RISER-Service)
- 5 • Monitoring and operation of the RISER-Service by the RISER ID Services GmbH (**Purpose:** Ensuring the stability of the RISER-Service)
- Change processes (Managing and integrating changes into live system) (**Purpose:** Troubleshooting and development of the RISER-Service)

Components not directly related to the service:

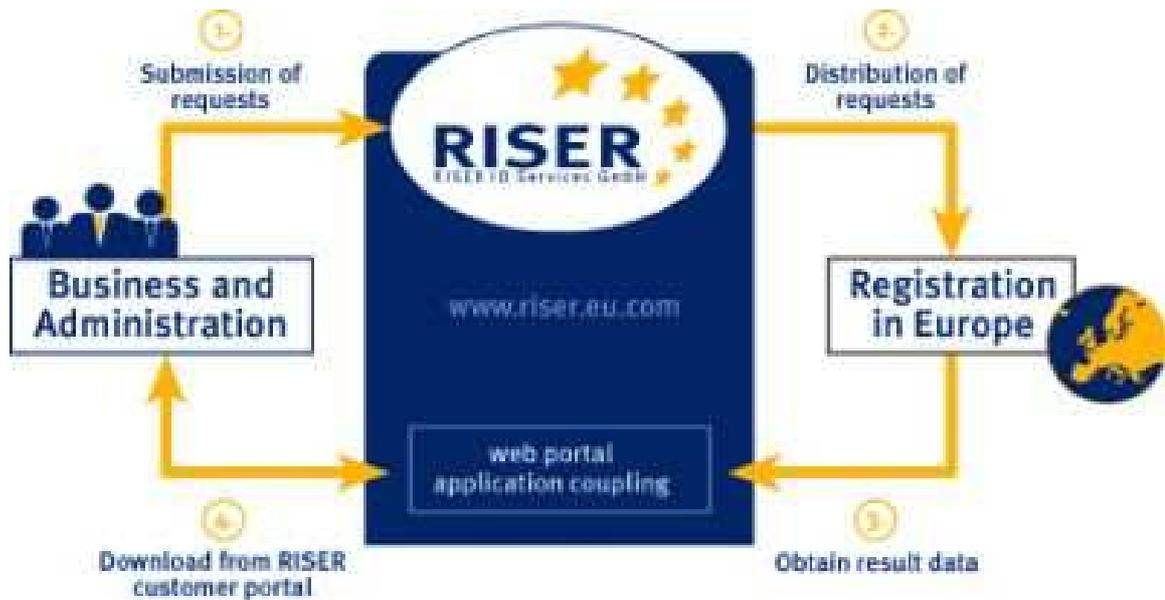
- 10 • Public RISER-Website with its Pre-Sales Web-Client for the Management of prospective customers
- The use of mobile hardware, which may not be used for the processing of the RISER-Service.
- RISER -Newsletter
- Realtime-ID-Check
- 15 • Realtime-Age-Check
- Providing Information from the „Relocation database“

7. General description of the IT product or IT-based service

RISER ID Services GmbH offers a central online service that enables companies to request and verify address information throughout Europe. The customer can re-
20 quest this information through single inquiries or through mass inquiries.

For a single inquiry, data is directly entered into a form, which is adapted to the requirements of the relevant national or local registry office. Mass inquiries are catered for by transferring a file containing multiple data sets with inquiries. RISER can adapt to the customers' needs in terms of data format and the required inter-
25 faces. The result of the inquiry returns the full name and full address as listed in the respective official register. In addition the result may contain further information, identified by codes e.g. whether the searched for person has changed their name.

The RISER ID Services GmbH acts as a data processor on behalf of its customers and does not store any data within its databases for their own purposes. Inquiries
30 are passed to official registers throughout Europe. Requests are processed in the following way:



Customer-Inquiries for different countries or communities are submitted via a central web portal. RISER distributes the request(s) to the respective register office(s). The register(s) process the request(s) and send the result(s) back to RISER. Following this, the result(s) can be downloaded from the web portal by the customer.

Only legal entities of Member States of the European Union can become customers of the RISER service.

8. Transnational issues

Through a central web portal, address verification can be performed against official population registers inquiring into

- Austria,
- Estonia,
- Germany,
- Hungary,
- Switzerland,
- Italy,
- Lithuania,
- Sweden,
- Ireland (Electoral role) and
- United Kingdom (Electoral role).

It is planned to link all the countries of the European Union to the RISER service, in which information from public records can be emitted.

9. Tools used by the manufacturer of the IT product / provider of the IT-based service

Hardware:

Hewlett-Packard (HP) -

- 5 • ProLiant DL380G5
- ProLiant DL380G4
- ProLiant DL380G3
- ProLiant DL360G4p
- ProLiant DL320s
- 10 • ProLiant DL140G3

Software:

- | | |
|------------------|------------------------------------|
| • Eclipse | • MaxDB |
| • CVS | • Tomcat Apache |
| • SQL-Studio | • SUN Java 1.6 |
| • Jasper-Reports | • Suse Linux Enterprise Server v.9 |
| • WinSCP | • Linux Debian Version 4.0 |
| • Putty | • openBSD |

10. Edition of EuroPriSe Criteria used for the evaluation

EuroPriSe Criteria (November 2010)

15 11. Evaluation results

Concerning the fundamental aspects of processing it is ascertained that RISER ID Services GmbH has developed a system that implements data protection provisions in an extremely positive manner. Although RISER ID Services GmbH is only the processor of the data to be processed it is evident that particularly the purposes for the data processing are defined clearly and explicitly and all data to be processed are precisely specified. In transnational operations it is to be noted that despite the involvement of a third party state (to date Switzerland only), in processing, the European data protection standards pursuant to Directive 95/46/EC can be fully complied with. From the view of the parties concerned, the RISER service should in this respect, as for all involved parties, be adequately implemented as regards data protection.

In the fundamental technical construction of the RISER service, data avoidance and minimisation were evaluated as being particularly successfully structured. RISER ID Services GmbH avoids communicating unnecessary data wherever possible. The objective of the RISER service is to make “simple resident register information” available across Europe. Therefore RISER ID Services GmbH only communicates data to the inquiring party satisfying this scope. Additional data that are also communicated by the census offices of the various countries due to the heterogeneous national laws are minimised to the data of a simple register report. The description of the service, amongst others through the data protection declaration provides the comprehensive transparency of the RISER service, both for customers and those concerned.

The admissibility of processing by RISER ID Services GmbH is mainly provided under the European Data Protection Directive 95/46/EC and the respective country-specific resident register laws. Due to the fact that RISER operates as a contracting data processor, the principal mainly functions as the responsible party and not RISER ID Services GmbH. The fundamental admissibility of a resident register report on the part of the principal is mainly provided through the existence of an agreement (Art. 7 b) Directive 95/46/EC) or the necessity to pursue legitimate interests (Art. 7 f) Directive 95/46/EC) and RISER ID Services GmbH may (must) assume that the customer is acting legitimately. The contracts with the customers are also worded in such a way that in the event of any unlawful processing of data on the part of the principal, RISER ID Services GmbH may terminate the contract. Overall it is determined that the business model of RISER ID Services GmbH incurs no complaint from a legal aspect and that the contracts concluded in this context implement the legal provisions and represent general data protection regulations in an excellent manner, such as for example, the implementation of technical organisational measures.

In the evaluation of special requirements to the various phases of the processing RISER-Service is, particularly in regards to the internal access to data, remarkable. Here a granular role concept is offered that enables an adequate adjustment to the requirements of the service.

Deletion of data following the end of requirement is also solved in a highly positive manner. Result data are only maintained for a very limited time period (six weeks) for direct collection by the principal. Following this the data are anonymised in stages and archived.

5 RISER ID Services GmbH has made compliance with all data protection provisions and duties to an important company objective. The evaluation therefore also achieved excellent results in this area. Both in purpose-specification and limitation, proportionality as also the quality of data it was determined that the RISER service has excellently implemented the requirements set in these areas. The purpose(s)
10 for which the data are obtained are clearly documented, data-minimisation very well implemented and the personal data being processed is relevant and not excessive in relation to the purposes for which they are collected etc.

Equally to be highlighted is the implementation of the provisions on contracted data processing. The RISER ID Service GmbH attempts here as contracted data
15 processor to implement the company standards it has developed also on its principals- in general an unusual procedure as the principal has the fundamental obligation to formulate its requirements concerning the implementation of data protection laws. As however the standards developed by RISER ID Services GmbH are very high and should be described as exemplary, it is to be particularly positively
20 evaluated that contracts are exclusively concluded on this basis. Hereby the communication of the data in third party countries is equally only permissible in the view of RISER-ID Services GmbH when pursuant to these data protection standards.

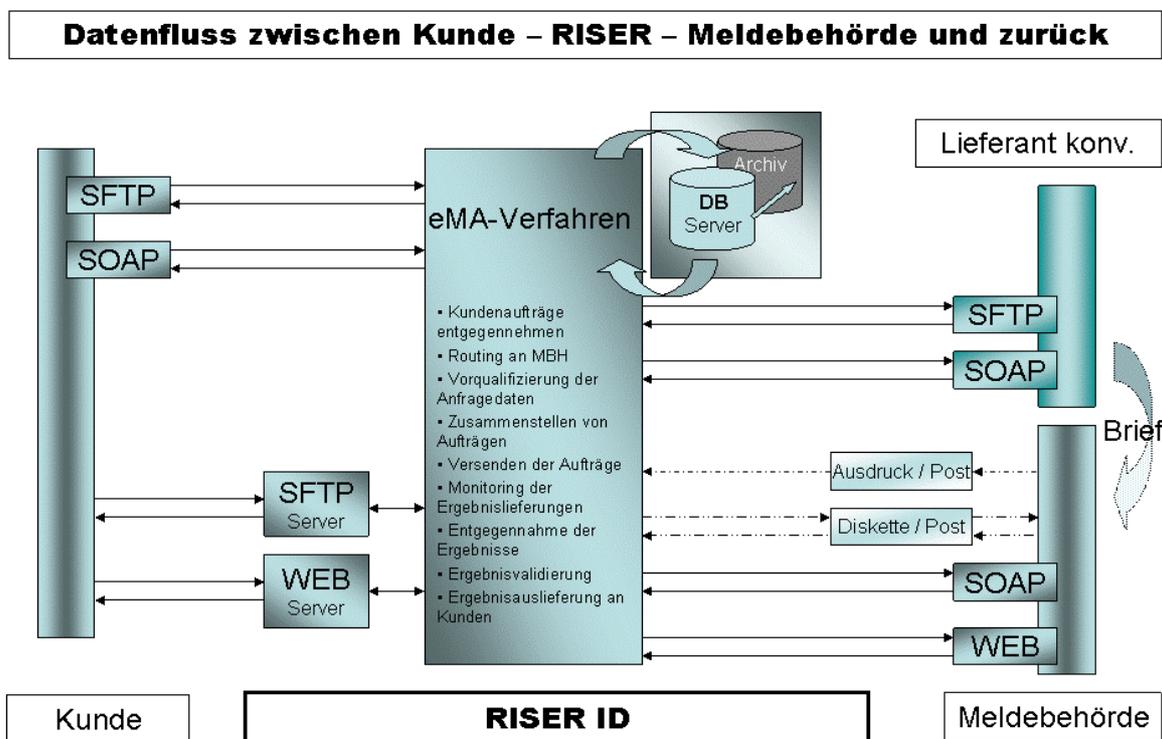
Furthermore the formalities to be complied with, and here in particular the notification,
25 are implemented in an excellent manner.

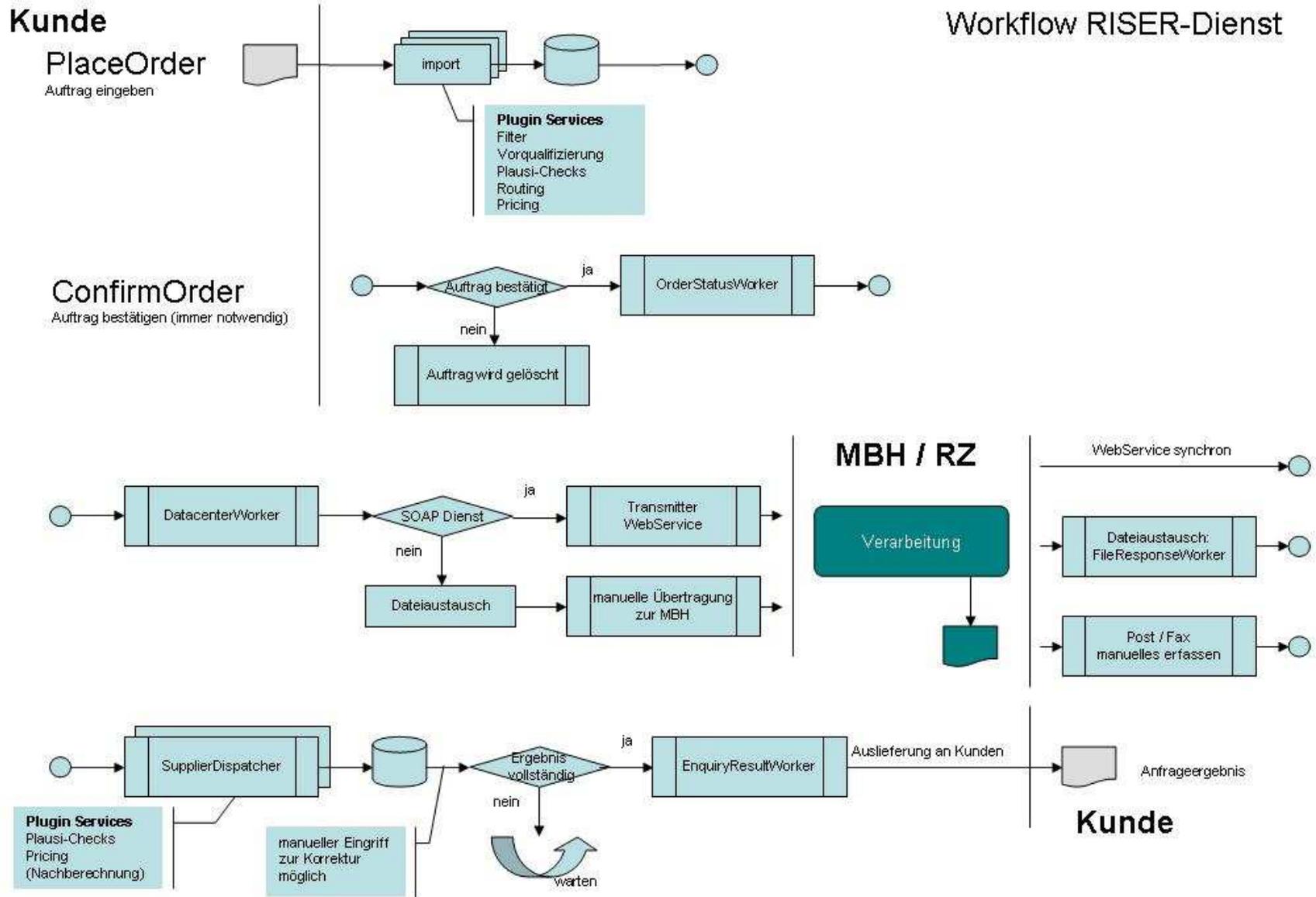
As a contracting data processor, naturally particularly the technical-organisational measures are elementary for the rendering of a service. RISER ID Services GmbH has generally performed a very high standard of work here in the technical area. Not only the physical access control, access to data, programs and devices or the
30 logging of processing personal data are adequately implemented. The same applies

to the backup and recovery are and also data protection and security management in general.

In evaluating the adherence to the rights pursuant to Directive 95/46/EC and the Rights under the Directive 2002/58/EC, no complaints arose during the evaluation, RISER ID Services GmbH implements all requirements found in this area in an adequate manner.

12. Data flow





13. Privacy-enhancing functionalities

RISER only processes the data for contractual purposes and always in accordance with data protection regulations. RISER does not use the data-results for their own purpose, as some other competitors do by storing the verified address-data for their own intentions. Companies, active in this area, can achieve better economies of scale and cost-saving effects through using the same address-data requested several times within a period - a new request to the register authority may seem to be no longer a necessity, although there is no confirmation as to whether this data is still valid. RISER does not follow such an approach, as it cannot be guaranteed that the correct data for the person concerned is transmitted.

In addition, RISER is attempting to use as little data as possible for processing or transmission. Therefore, data-results coming from foreign registers are reduced if they contain more data than "simple register information".

RISER keeps comprehensive information for their data subjects and potential customers with regard to the various data protection measures. Moreover, RISER is still trying to influence and adapt the customer to attain the high level of data-protection RISER meets as contractor. So RISER tries to define the specifications for the technical and organizational measures that are necessary for the completion of a data-processing-contract themselves, although this should really be determined by the customer. In this way RISER guarantees data protection minimum standards of the data processing contracts. Without their implementation for example, a contract would not be signed,

14. Issues demanding special user attention

Not applicable

15. Compensation of weaknesses

Not applicable

16. Decision table on relevant requirements

<i>EuroPriSe Requirement</i>	<i>Decision</i>	<i>Remarks</i>
Data Avoidance and Minimisation	excellent	Service only uses the minimum of data concerned
Transparency	adequate	Documentation and privacy statement are informative, up-to date and understandable
Technical-Organisational Measures	adequate	Technical and organizational measures are preventing access in a very good way; there are installed secure logging mechanisms as well as mechanisms to prevent accidental loss of data. Backup mechanisms and recovery are established and are capably running. Also Data Protection and Security Management provide a good basis.
Data Subjects' Rights	adequate	RISER is processing data as processor and so responsible for the data subject's rights only in a small area; they are implemented as they should be.

Experts' Statement

I affirm that the above-named IT-based service has been evaluated according to the EuroPriSe Criteria, Rules and Principles and that the findings as described above are the result of this evaluation.

Berlin, 17.02.2011 Prof. Dr. Friedrich Holl

Place, Date	Name of Legal/ Technical Expert	Signature of Legal/ Technical Expert
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Certification Result

The above-named IT product / IT-based service passed the EuroPriSe evaluation.

It is certified that the above-named IT product / IT-based service facilitates the use of that product or service in a way compliant with European regulations on privacy and data protection.

Berlin, 17.02.2011 Unabhaengiges Landeszentrum fuer Datenschutz - ULD

Place, Date	Name of Certification Body	Signature
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