

# Technical and organisational measures (TOM) of the Scicoverly GmbH (operator of the website Labvanced.com ) according to Art. 32 DS-GVO

## I. Confidentiality

### A. Physical Access control

#### 1. Data center / server:

In order to guarantee the highest security standards our servers (Dedicated Root Server) are located in a professional server center, which is managed by Hetzner GmbH. The technical organizational measures of Hetzner GmbH are available under the following link (<https://www.hetzner.com/AV/TOM.pdf>). The access control measures there are as follows:

- Electronic access control system with logging
- High security fence around the entire data centre park
- documented key allocation to employees and colocation clients for colocation racks (each client exclusively for his colocation rack)
- Guidelines for the escort and identification of guests in the building
- 24/7 staffing of the computer centres
- Video surveillance at entrances and exits, security gates and server rooms

#### 2. Administration by Scicoverly GmbH:

- Electronic recording system with logging of login / access by any employee of Scicoverly GmbH.

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#### Scicoverly GmbH

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## B. Remote Access Control

- Manual locking system in all rooms of the Scicoverly GmbH.
- Use of secure passwords at all levels of administration and for all administrative and employee accounts.
- 2-factor authentication in all sensitive areas, including email.
- Administration of user rights by administrators.
- Minimum number of administrators with access rights.
- Use of document shredders (DIN 32757) to destroy physical documents.

## C. Separation Control

- Data is stored physically or logically separated from other data.
- Data is also backed up on logically and/or physically separate systems.

## D. Pseudonymisation

- Physical or logical separation in the storage of user data, participant data and media files, and create user content (e.g. created studies)
- No explicit storage of personal participant data by Scicoverly GmbH. An exception is the separate storage of the e-mail address in studies with several sessions in order to remind participants by e-mail to participate again. However, neither the customer nor employees of Scicoverly GmbH have direct access to these separately stored e-mail addresses.
- The contractor or study creator itself is responsible for ensuring the pseudonymization of participant data, since Scicoverly GmbH does not control which data are collected in the studies prepared by the customer.

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## II. Integrity (Article 32 Section. 1 lit. b DS-GVO)

### A. Transfer Control

- All employees of Scicoverly GmbH have been instructed within the meaning of Art. 32 para. 4 DS-GVO and are obligated to ensure that personal data are handled in compliance with data protection regulations.
- Data will be deleted in compliance with data protection regulations after termination of the contract or at the request of the customer.
- Participant data can be completely deleted by the client independently through the web application.
- Encrypted access (HTTPS / SSL) for all electronic services of Scicoverly GmbH.

### B. Receiving inspection

- The participant data is entered or recorded by the client himself.
- The changes of all data including the participant data are logged.

## III. Availability and resilience (Art. 32 Section. 1 lit. b DS-GVO)

### A. Availability control

1. Backup and recovery concept with daily backup of all relevant data.
2. Expert use of protection programs (virus scanners, firewalls, encryption programs, SPAM filters).
3. Use of hard disk mirroring for all relevant servers.
4. Monitoring of all relevant servers.
5. Use of uninterruptible power supply, network backup system<sup>1</sup>
6. Permanently active DDoS protection<sup>1</sup>

<sup>1</sup>=Guaranteed by the Hetzer online GmbH

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## IV. Procedures for regular review, assessment and evaluation (Art. 32 Section. 1 lit. d DS-GVO; Art. 25 Section. 1 DS-GVO)

### A. Order Control

- Our employees are instructed at regular intervals in data protection law and they are familiar with the
- Procedural instructions and user guidelines for data processing on behalf of the client, also with regard to the client's right to give instructions.
- Our General Terms and Conditions (<https://www.labvanced.com/agb.html>) contain detailed information on the type and scope of the commissioned processing and use of personal data of the client.
- Scicoverly GmbH has appointed a company data protection officer and an information security officer.
- The selection of Hetzner GmbH as service provider/operator of our data center/server was carefully made with regard to data protection and data security reasons.
- A review of the data protection and security standards of Hetzner GmbH takes place regularly.