

Data Processing Sheet

What	How	Why	Where	For how long?
PII: Name, E-mail address	 Provided by the user during sign-up (invitation link); Provided by organization manager (manually entered or imported in the dashboard); Imported automatically by BeWizr from an HRM application. 	 To identify the participant to the (organization) managers and other participants. To provide a personalized greeting (login, e-mail). 	Our SQL database.	For as long as the organization to which the participant belongs to is a customer of HTG; or the organization decides to remove the user.
Submission to tests	 The participant answered test questions. The participant uploaded a document for review by the manager. 	 To grade a participant by organization managers. To grade a participant by employees of HTG. 	Our SQL database.	For as long as the organization to which the participant belongs to is a customer of HTG; or the organization decides to remove the user.
Activity	 When the user uses the BeWizr platform, all requests (actions) are logged. 	 To measure participant progress. 	Our SQL database and logfiles of our infrastructure.	For as long as the organization to which the participant belongs



		 To measure usage of our application. For technical problem diagnoses. 		to is a customer of HTG; or the organization decides to remove the user; or 3 months for infrastructure log files.
Backup	All data mentioned above is archived every night and encrypted on the client according to industry standards.	 For disaster recovery. 	On BackBlaze B2.	For 1 year.

Subprocessors

TransIP	Virtual computing platform; data transfer; Domain Name Server (DNS)
Vondellaan 47 2332 AA Leiden	
https://www.transip.n l/legal-and-	



security/algemene- voorwaarden/	
BackBlaze B2	Encrypted backups of our application data.
201 Baldwin Ave. San Mateo, CA, 94401 USA	
https://www.backblaz e.com/company/polic y/privacy	
Mailgun	Relay of our transactional e-mails (participant invitations, notifications, certificates, etc.).
112 E Pecan St, #1135 San Antonio, TX, 78205 USA	
https://www.mailgun. com/gdpr/	