

SOFTWARE PRIVACY COMPLIANCE REPORT:

NP NoPaperSolutions for Hotels & Resorts

- EXCERPT -

Technical Support /Audit: Andrea Paro – paro@ assoprivacy.eu

Commercial Support /Revisione Massimo Bruno – m.bruno@assoprivacy.eu

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Version	Modification Date	Author	Notes
1.0	June 4, 2020	Andrea Paro	Audit
1.0	June 9, 2020	Andrea Paro	Audit Report
1.0	June 9, 2020	Massimo Bruno	Revision
1.0	June 10, 2020	Andrea Paro / Massimo Bruno	Final version

PREAMBLE

On June 4, 2020 a **Compliance Audit** was conducted of the software “**NP NoPaperSolutions Hotels & Resorts**” of the company **NP Technology**. Auditing activities included interviews and the completion of specific checklists by the Senior Management and Technicians of the organization and focused on the in-depth analysis of the existing documents as well as on the assessment of compliance with the legal requirements in force.

NP Technology Slu is a company with registered office in Carrer Josep Rossell, 1 - AD400 - La Massana (Principality of Andorra). Its corporate mission is to study, analyze and implement new technologies with the purpose of offering high-tech solutions for more efficient and modern management processes. The company's main goal is the implementation of the digital document, a solution which reduces the costs connected to document production, distribution, search and archiving. NP Technology is specialized in the hotel and tourism sector, where it stands out for delivering digital solutions to the problems connected to check-in/check-out operations, helping its clients to move away from the traditional paper-based model.

In this regard, **NoPaperSolutions** is specifically intended to manage all Front Desk Check-in/Check-out operations, including the fulfilment of legal obligations.

1. INTRODUCTION

The Compliance Audit was conducted by PARO ANDREA - a Consultant and Senior Auditor at Assoprivacy - between June 4 and June 9, 2020. Auditing activities were carried out according to EU regulations and by means of shared auditing tools such as compliance audit check lists, key-requirement assessment tables and - for the purpose of gathering the necessary information and compiling the final report - interviews with the main representatives of the company and documented analyses.

2. SCOPE OF AUDIT

The Audit assessed the Compliance of the software “NP NoPaperSolutions Hotels & Resorts” of the company NP Technology with EU regulations (GDPR 2016/679).

The audit focused on the compliance of the above-mentioned software solution with the criteria listed in the extended report titled “*Rapporto di Privacy Software Compliance: NP NoPaperSolutions per Hotels & Resorts*”. The objective was to verify the compliance of said software with the New European Regulation on Data Protection (General Data Protection Regulation, GDPR 2016/679)..

The auditing process was conducted through interviews to the Company’s manager as well as through the examination of procedures, technical development features and of the available documents.

3. OBJECTIVES

The general objective of this compliance audit is:

- To verify that the software solution “NP NoPaperSolutions Hotels & Resorts” of NP Technology complies with the provisions set forth in the New European Regulation on Data Protection (General Data Protection Regulation, GDPR 2016/679).

Specifically, the auditing process aimed to verify the product’s compliance with the following requirements:

3.1 Compliance requirements:

- Roles of Producer and Client (Art. 4 par. 1 p. 7), 28 par. 1)
- Rules applying to the aforementioned roles (Art. 28 par. 3)
- Designation of the DPO (Art. 37)
- Information to be provided to data subjects (Art. 13 e 14)
- Request for consent to data subject (Art. 7 e 23)
- Modalità d’esercizio dei propri diritti da parte degli interessati (Art. 15-22)
- Rights of the data subject (Art. 15-22)

- Data subject's right to rectification of their personal data upon request (Art.16)
- Data subject's right to erasure (or 'right to be forgotten', Art. 17)
- Data subject's right to data portability (Art.20)
- Data storage time limit (Art. 5 par. 1 let. e) and 13 par. 1 let. d)
- Definition of a Data Breach Management Plan (Art. 33 and 34)
- Management of remote data access systems stored On Premises and/or SaaS/PaaS (Chapter IV, Section 2, Art. 32)
- Alert Management and of risky behaviors (Chapter IV, Section 2, Art. 32)
- Management of data backup systems accessible to the Controller/Data subject (Chapter IV, Section 2, Art. 32)

3.2 Compliance requirements regarding the adoption of Security Measures for the Protection of personal data:

- Data protection Certification obtained by the Producer (Art. 42)
- Existence and type of Authentication System (Chapter IV, Section 2, Art. 32)
- Existence and type of Authorization System (Chapter IV, Section 2, Art. 32)
- Existence and type of Systems for the protection against viruses, malware and possible destruction, loss or alteration of data (Antivirus, Secure Software Development) (Chapter IV, Section 2, Art. 32)
- Existence and type of systems for the protection of digital data against unauthorized access, data theft and loss of control on IT systems (Firewall) (Chapter IV, Section 2, Art. 32)
- Existence and type of Backup and Disaster Recovery systems (Chapter IV, Section 2, Art. 32)
- Existence and type of Monitoring System on IT systems and activities (Log) (Chapter IV, Section 2, Art. 32 and General Provisions issued by the Italian Data Protection Authority – November 27, 2008 – Measures and arrangements regarding the tasks committed to System Administrators)
- Existence and type of a System for periodic updates of Operating Systems, applications and software (Chapter IV, Section 2, Art. 32)
- Existence and type of Systems for the pseudonymization, encipherment and encryption of data and/or communication channels (Operating Systems, applications and software) (Art. 6 par. 4 let. E), 25, 32 par. 1 let. A) and 34 par. 3 let. A))
- Existence and type of a process for testing the effectiveness of the security measures (Operating Systems, applications and software) (Chapter IV, Section 2, Art. 32, let. D)

CONCLUSIONS AND AUDIT OPINION

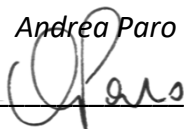
Based on the currently available information and considering the development of the software “NP NoPaperSolutions” of the company NP Technology Slu, **the product is compliant with the EU General Data Protection Regulation (GDPR) 2016/679** as all its operating features as well as technical and organizational Security Measures are pursuant to the provisions of the aforementioned Regulation

Following the Compliance Audit conducted for NP Technology Slu and pursuant to art. 5, par. h) of Assoprivacy Bylaws - which enables our Association to organize and deliver information, assistance and consultancy services to our associates in accordance with their economic development needs - we express the following opinion:

NP NoPaperSolutions Hotels & Resorts is adequately developed for the purposes of the protection of personal data and meets all the requirements set forth in EU Regulation 2016/679 (GDPR). **Therefore, taking into account the state of the art, the implementation costs as well as the nature, scope, object, context and purposes of the data processing, the product is assessed as compliant with the aforementioned Regulation.**

Assoprivacy Senior Auditor

Andrea Paro



President

Massimo Bruno



ASSOPRIVACY

Via Ballarini, 12
22100 Como
Cod. Fisc. 91164180407