

Data Protection Report

Inspection Report on the Implementation of GDPR Requirements

Drooms GmbH
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Summary

The inspection of the company regarding its processing of personal data as well as the processing of personal data as a data processor with respect to the requirements set out by the GDPR has revealed that Drooms GmbH is in compliance with the data protection requirements of the EU General Data Protection Regulation (GDPR). Compared to other companies, Drooms GmbH's management of data protection is very well-engineered and is in the process of undergoing further expansion to establish a comprehensive data protection and information security management system along with a continuous improvement process, both for its own data processing as well as the processing it carries out as a data processor on behalf of other companies.

The company's products meet the privacy by design and default requirements stipulated in Article 25 GDPR. The client is therefore able to take appropriate additional measures and is responsible for implementing the corresponding settings within the software, provided this does not conflict with any legal requirements.

In addition, the principles of processing personal data under Article 5 GDPR, in particular those of transparency, fairness, purpose limitation and data minimisation, have been complied with appropriately. Generally speaking, only personal data necessary for each specific purpose of the processing is processed.

In the process, the client must ensure the lawfulness of the data processing itself and is able to control the extent of processing using the software. Furthermore, the client has the option of controlling access itself using a granular authorisation concept. Corresponding presettings as well as additional technical and organisational measures ensure that unauthorised parties both within Drooms GmbH and external to it do not receive access to the software.

In addition, Drooms has set up an extensive data protection and IT security system and developed appropriate technical and organisational measures on that basis, which are sufficient to meet the requirements regarding security of processing under Article 32 GDPR. Appropriate processes have been implemented to continuously improve processes and test and further develop these measures, taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons.

Drooms GmbH has also ensured – both within the software as well as in its processes – that the client receives adequate support in safeguarding data subjects' rights.

In conclusion, I have determined that the data protection system and its technical implementation fundamentally meet the requirements for the development and operation of data rooms and the software required to do so as defined by the EU GDPR. The same applies to the organisation and management of data protection regarding data processing on behalf of Drooms GmbH's clients.

Certificate 11-17-010 will be reissued for the company's data processing under Article 28 GDPR.

Bad Homburg, 26/08/2018

Arnd Harnischmacher

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