

M-Files Corporation  
Company 0686200-7  
Hatanpään valtatie 26  
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## Register specification

18 June 2012

The personal information register held by M-Files Corporation is maintained as follows:

Contact person in issues concerning personal information:

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The register is called: M-Files Cloud Vault User Database

**The purpose of processing personal information** is provision of Cloud Vault Services and related support and maintenance services. Personal information processing is required by license management, authentication and access control as well as for support services. In addition, personal information is collected and used for user rights differentiation purposes, invoicing and information provision purposes. Some third party hosted services require the use of personal information and in such case, the third party service provider will process personal information provided by the M-Files system.

**The source of personal information** is the license management system, where the users of M-Files have to be registered in order to enable access to the system. The provision of Cloud Vault Service with a user and use based licenses and related support services would be impossible without processing user information which includes personal information. Authorization for processing of information is based on contract.

### **Information included in M-Files Customer Database**

Information about M-Files customer organizations

- Company / Organization
- Address
- Postal code
- City
- Country
- State or province
- Phone number
- Fax
- Email
- Web site
- VAT ID
- Industry

Information about M-Files users

- First name
- Last name
- Phone
- Fax
- Mobile
- Email

Any user can request M-Files to correct any misleading or false information about oneself. Customer may revise the user information on their employees in order to see who may use the system and what kind of licenses it holds.

**Transfer of information** is conducted whenever required by fulfilling a support or maintenance task requested by client or otherwise necessary in order to produce the service. In case the back up of the system or an information request by a customer requires transfer of personal information, such transfer shall be made. In such case, the transfer will be fully automated and it may cross country and state borders as well as borders of European Union and European Economic Area.

### **Principles of protection of personal information**

- MANUAL PROCESSING OF PERSONAL INFORMATION
  - Supplier selection principles require fulfilling of legal and industry standard requirements
  - Non-disclosure agreements with employees, outsourced workers and contractors
  - Induction plan that includes providing information on non-disclosure and the need to maintain confidentiality
  - Access to information is controlled
  - Processing of personal information in connection to support requests is done as required by the ticketing system and ability to answer to the requestor.
- AUTOMATED PROCESSING OF PERSONAL INFORMATION
  - High level of protection with technical measures. Communication within the service is encrypted but part of the service is conducted by use of electric mail such as answers to support tickets. Use of electric mail is not secured by encryption.
  - The Supplier selection principles require fulfilling of legal and industry standard requirements for data protection and for personal data protection
  - Controlled access to information by use of authentication measures

### **Audit**

The possibility to audit the whole system and to access any information in the register is with no one. Should there be a need to audit the system, such audit can be done at the expense of the requestor by a reputable third party auditor and only to the extent it is necessary for acceptable purposes and only under strict confidentiality obligations.