



Short Public Report

RISER-Service

Recertification No. 2

1. Name and version of the IT-based service:

IT-based service: *Registry Information Service on European Residents („RISER-Service“)*

Functional status: February 2016.

2. Manufacturer / vendor of the IT product / Provider of the IT-based service:

Company Name: RISER ID Services GmbH

Company Address: Charlottenstraße. 80, 10117 Berlin, Germany

Web: www.riserid.eu

Contact Person: Mr. Hendrik Tamm

3. Time frame of evaluation: 2015-12-01 – 2016-02-22

4. EuroPriSe Experts who evaluated the IT product / IT-based service:

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5. Certification Authority:

Name: EuroPriSe Certification Authority
Address: Joseph-Schumpeter-Allee 25
53227 Bonn
Germany
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6. Specification of Target of Evaluation (ToE):

Components related to the service:

- RISER Internal Client
- RISER Application including
 - eMA monitorings
- RISER Customer-Portal, RISER Supplier-Portal and RISER Registration-Authorities-Portal

Not part of the ToE are:

- The use of RISER via smartphone or tablet
- The operational environment on the customer's site
- Hardware and peratingsystems in the datacenter
- Determining of postal addresses on the database of the Deutsche Post adress GmbH & Co. KG, as well as determining the birth data at Schufa Holding AG, which can optionally be used before using the Registry Information Service.
- Realtime-ID-Check and Realtime-Age-Check
- credit agencies of the suppliers and population registers
- further services of RISER ID Service GmbH.

7. General description of the IT product or IT-based service:

RISER ("registry information service on European residents") is an IT product and IT-based service. RISER is offered by the RISER ID Services GmbH as registration data broker to obtaining registration information on behalf of public or private bodies. These can be simple and to a limited extent also advanced official register inquiries for Germany, Switzerland and Austria via RISER.

Customer-Inquiries for different countries or communities are submitted via a central web portal at www.riserid.eu. RISER distributes a request to the respective register office. The register office processed the request and sends the result back to RISER. Following this, the result can be downloaded from the web portal by the customer. The results are deleted, taking into account the contractual retention period.

When obtaining register inquiries, the RISER ID Services GmbH prepares the request and result data, by checking manually the incoming or outgoing data for plausibility, adapted format structures and inconsistent results.



Figure 1 Workflow – simplified view

Users of RISER are companies and public bodies, which are based in the EU, suppliers (broker services) and registration authorities. Users can log in with name, ID and password on the closed user-group and maintain person related master data for their account, obtain activity confirmations, or process information.

The customer can request this information through single inquiries or through mass inquiries. For a single inquiry, data is directly entered into a form, which is adapted to the requirements of the relevant national or local registry office. Mass inquiries are

catered for by transferring a file containing multiple data sets with inquiries. The customer receives a collection of orders, indication of price, and the request to confirm the selection with "OK" which places the order into the user's account. RISER processes the confirmed request and provides the registration results in the account again.

With the optional "eMA-monitoring" an additional service is offered to improve the quality of services. The customer will be informed by RISER in case of time-delayed updates in the population register. The customer is informed when selecting this additional service, if the registration authority gains new information, and can selectively stimulate a new request to this person. In the course of eMA-Monitoring neither personal request and result data is stored permanently for own purposes, nor is the data released to third parties (so-called addresspooling). eMA-monitoring is subject to evaluation.

Addresses can optionally be determined by RISER in the database of the Deutsche Post Adress GmbH & Co. KG. In addition, RISER provides the optional potentiality to determine dates of birth to a requested person at the Schufa Holding AG, if there is a legitimate interest. Moving database and credit agency are not subject of the evaluation.



RISER Dienst Kundenportal Sammelanfrage Einzelanfrage Aufträge verfolgen Anfragen auswählen Sachstandsanfragen Benutzer verwalten Benachrichtigungen Persönl. Einstellungen Leistungsnachweis Support Abmeldung Lieferantenportal Meldebehördenportal Kunde werden	Interaktive Anfrage Deutschland  Anfrageland ändern 	Datum: 22.07.2010 Kunde: RISER ID Services GmbH Benutzer: Hendrik Tamm
Im zweiten Schritt der Einzelanfrage machen Sie bitte die erforderlichen Angaben zu der Person, die Sie anfragen möchten.		
<i>Bitte geben Sie PLZ und/oder Ort an.</i>		
Postleitzahl	<input type="text"/>	Ort <input type="text"/> <input type="button" value="Prüfen"/>
<i>Bitte geben Sie Namen und Vornamen an.</i>		
Nachname	<input type="text"/>	
Vorname	<input type="text"/>	
<i>Bitte geben Sie von den drei folgenden Angaben (Geschlecht, Geburtsdatum, Anschrift) möglichst viele an.</i>		
Geschlecht	<input checked="" type="radio"/> keine Angabe <input type="radio"/> männlich <input type="radio"/> weiblich	
Geburtsdatum	<input type="text"/> (Format: TT.MM.JJJJ)	
Straße	<input type="text"/>	Hausnummer <input type="text"/>
<i>Aktenzeichen der Anfrage für Ihre internen Zwecke</i>		
Aktenzeichen der Anfrage	<input type="text"/>	

Figure 2 example for a single inquiry

In the standard design of RISER inquiry and results data for customers are stored on an archiving server for six weeks. Customers can set a shorter retention period. Thereafter the data is adopted by the revision database of RISER, which serves the verification and accounting for reporting to authorities and customers. The inquiry and results data is kept 90 days before made anonymous and the receipt archived with no personal connection.

The RISER ID Services GmbH undertakes the register query process as well as the preparation of the result data on behalf of the customer at the site in Berlin. The RISER IT systems are housed on behalf of RISER ID Services GmbH in the datacenter of QSC AG in Munich. This is a pure housing. The IXSYS EDV Systemberatung in Munich

is commissioned to undertake the operation of IT-systems through the RISER ID Services GmbH. For the implementation of conventional (usually written) registration inquiries the RISER ID Services GmbH makes use of other sub-contractors based in Germany.

8. Transnational issues:

The RISER service is provided for the countries Germany, Austria and Switzerland.

9. Tools used by the manufacturer of the product / provider of the IT-based service:

None.

10. Edition of EuroPriSe Criteria used for the evaluation:

EuroPriSe Criteria Catalogue, November 2011.

11. Modifications / Amendments of the IT product or IT-based service since the last (re)certification

In the frontend and the customers´ interface the required field for providing a business reference has changed into mandatory. In addition, result information on information blocks and "no fixed abode" have been dropped, because this information is not provided anymore. In the frontend and the interface to the registration authority request and result documents have been changed to OSCI xMeld 2.1. In addition, details are given on the commercial purpose, "Address discovery and disclosure to a notified body" as well as the customer ID, as the body to whom data have been disclosed. It must also be specified there, that the request is not made for purposes of advertising and address trading. Finally, the encryption method was switched to Veracrypt.

12. Changes in the legal and/or technical situation

On 11/01/2015 the Federal Registration Act (Bundesmeldegesetz - BMG) came into force in the Federal Republic of Germany. It has changed the requirements for the granting of register information to public (§§ 34ff. BMG) and to private bodies (§§ 44ff. BMG). Significant changes for register information for commercial purposes are:

- The commercial purposes of the recipient must be specified in the request (section 44 para 1 sentence 2 BMG).

- The recipients of the data is only allowed the use for those purposes, which he has specified in the request (§ 47 para 1 S. 1 BMG).
- The data may be used for the purposes of advertising and address trading only if the person concerned has expressly agreed to (article 44, para. 3 S. 1 BMG).
- when the purposes specified in the request is fulfilled, the data is to delete (§ 47 para 1 sentence 2 BMG)
- For providing automated resgistration register information the applicant must identify the person concerned clearly, where the sex of the person concerned should not be used for the request (section 49 (4) S. 1 BMG).

RISER now offers an optional identification of the date of birth for customers having a legitimate interest by means of the engagement of the Schufa Holding GmbH.

Customers of RISER have, after signing a supplementary agreement to the customer contract, in conjunction with the simple register information, the ability to determine a date of birth to the requested person by means of transmission of data to Schufa holding GmbH. The date of birth is necessary to ensure the automated processing in accordance with § 49 para 4 Nr. 1 BMG. The requested person is informed on the provision of information within his information right.

RISER puts these requirements into practice with the use of respective forms, as well as with a revised contractual basis with the customer. Now customers must assure that the requests for register information are not for the purposes of advertising and address trading. They commit themselves to give a unique business reference in the requests and will be pointed out, as far as possible to indicate the date of birth to the requested person in the request for register information.

RISER has, however, no longer following functionalities:

Requests for register information for the countries Estonia, Sweden, Lithuania and Italy are no longer supported. Registration information is only available for the countries Germany, Switzerland and Austria. The optional determination of numbers using freely accessible telephone directories is omitted. The filling of the database of the deceased was suspended on 11/01/2015.

13. Evaluation results:

Using RISER companies and public authorities in Germany, Austria and Switzerland obtain a user-friendly way to assign a registration data broker obtaining registration information. The RISER GmbH is working as a data processor. Rights and obligations are governed by a contract to order data processing, which complies with all aspects of data protection. Also incorporated subcontractors of the RISER ID Services are legally bound by contract and checked regularly.

The scope of the data processing using RISER is tailored to the data required by the respective registration authorities. It was verified by the auditors that RISER serves the purpose to process as few data as necessary and at the same time only relevant data. RISER is constantly being optimized for this purpose.

As far as additional data is entered at all in a request entry in form fields, this is optionally done by the customer. Moreover, RISER doesn't store data permanently for their own purposes, but reduced the storage time of the inquiry and results data in the standard version to 6 weeks, to allow the customer the retrieval. Then the data is transferred to the revision database of RISER, which serves the verification and accounting to reporting authorities and customers. The inquiry and results data are kept here 90 days before being made anonymous and the billing information archived without any personal reference.

Also with the optional eMA-monitoring only dedicated data is used. RISER reduces data to a hash value that cannot be decrypted on the part of the RISER ID Services GmbH. This prevents reuse of results data from the registration authority.

The use of RISER is intuitive. Customers can see at any time the processing steps and what data are in the workflow.

All essential documentation is available in German and English language. The information is easily accessible, meaningful and informs the user comprehensively about RISER, the use and the data processing operations.

Registration requests and the use of the provided data must be carried out only on the basis of the registration laws. RISER supports compliance with the respective legal bases by configuring form fields and data records, so that they meet the requirements of the respective registration authority and at the same time are accepted for a request of register information by these.

The data processing using RISER is usually not initiated by the data subject itself but by the customer as the responsible body. Therefore the data processing using RISER depends on a balancing of the interests of all those involved in addition to the legal and contractual bases. The customer is obliged on the compliance with the requirements under the contractual agreement. On the other hand, the registration authority is responsible for the provision of register information on the basis of legislation.

RISER complies with legal requirements for giving a reason and purpose of the information by having the commercial purpose to be specified mandatorily for simple register information of private legal persons from German authorities (article 44, paragraph 1, sentence 2 BMG). For advanced register information, a legitimate interest in accordance with § 45 BMG must credibly be shown, which is captured by RISER on corresponding data fields and only then passed on to the registration authorities. Also customers must assure now contractually that the requests for register information are not for the purposes of advertising and address trading. They undertake to give a unique business reference in the requests and will be pointed out, as far as possible to specify the date of birth to the requested person in the request to the register information.

In case of legal barriers according to the respective registration law, registration information is not given by the respective authority.

The proportionality in the sense of article 6 of Directive 95/46/EC is respected because the user is given the ability to reduce the amount of data to a minimum using RISER.

This applies also for the new upstream methods to query a date of birth at the Schufa Holding AG. Pursuant to § 49 para 4 BMG information may only be given, if the applicant has described the requested person with family name or former name and at least one given name as well as with two more data stored on the basis of § 3 para 1 BMG, except the Nr. 1 to 4, 7, 10 and 11, and the requested identity has been proven by the automated alignment of the given data in the request and the stored data. A phonetic search is permissible for surname, previous names and given name. In addition, the identity of the data subject must have been determined unambiguously by means and as a result of an automated matching of the data specified in the application with the data that are stored in the register. Moreover, the use of sex as a request (article 3 para. 1 No. 7 BMG) is no longer allowed. However the date of birth (section 3 para 1 No. 6 BMG) is not covered by this prohibition, and now represents the key attribute of the request for the customer of RISER. Since not every customer has the date of birth to the requested person, RISER allows now an upstream request to the

date of birth at the Schufa Holding AG. Knowing the date of birth, the register information can then be obtained for this person according to § 49 BMG.

This also applies to the address research in the moving database of Deutsche Post Adress GmbH & Co. KG. This can be done optionally in advance of register information, to update the address. The person concerned has granted a consent to the entry into the moving database with a forwarding request. Without having issued a forwarding request or when having revoked the consent, his data is not in the database.

Optional eMA-monitoring is also proportionate. It serves only quality improvement using hash values. No reuse of registration data takes place, but intervenes only in cases where the result data set of the population register is not usable and the possibility of a correction is in the legitimate interests of the customer.

RISER as the responsible body supports the implementation of the rights of the person concerned, by giving the user all the necessary information on the data processing, which would be required for a notification of persons concerned. RISER ID services has also established a well-structured data protection management, which can help the customer if necessary.

The technical and organizational data protection measures taken by RISER are adequate. The certification of the datacenter of QSC AG in accordance with ISO/IEC 27001:2005 for the scope "IT - services housing, hosting and data center operations" proves their implementation and effectiveness. Technical and organizational data protection and data security measures are contractually binding set with all subcontractors. In this respect the IXSYS EDV Systemberatung participates in the security measures taken on the part of the data center.

RISER portal users are prompted in different places to submit of a secure password. The Web pages are encrypted via https and adequately protected against unauthorized reading of communications during data transfer. All system activities in the editing process are logged and processed in the RISER internal client for monitoring and control. The log-data is stored for troubleshooting as well as for abuse prevention for 6 months and then automatically deleted. This is necessary, especially in the case of potential abuse (such as e.g. the use of the account by unauthorized users or for private purposes), because cases are usually detected and claimed by the customer with a considerable time lag in the wake of the accounting control. An evaluation is carried out in case of need, which is plausible. Data encryption is a based on a well-

structured crypto-concept which is implemented with reasonably safe encryption mechanisms.

Operative business of the RISER service takes place in the offices of RISER ID Services GmbH in Berlin in accordance with a IT-concept. The RISER ID Services GmbH has a detailed and well-structured fault and emergency management as well as a test and approval procedure established and documented.

14. Data flow:

The following figures describe the data flows:

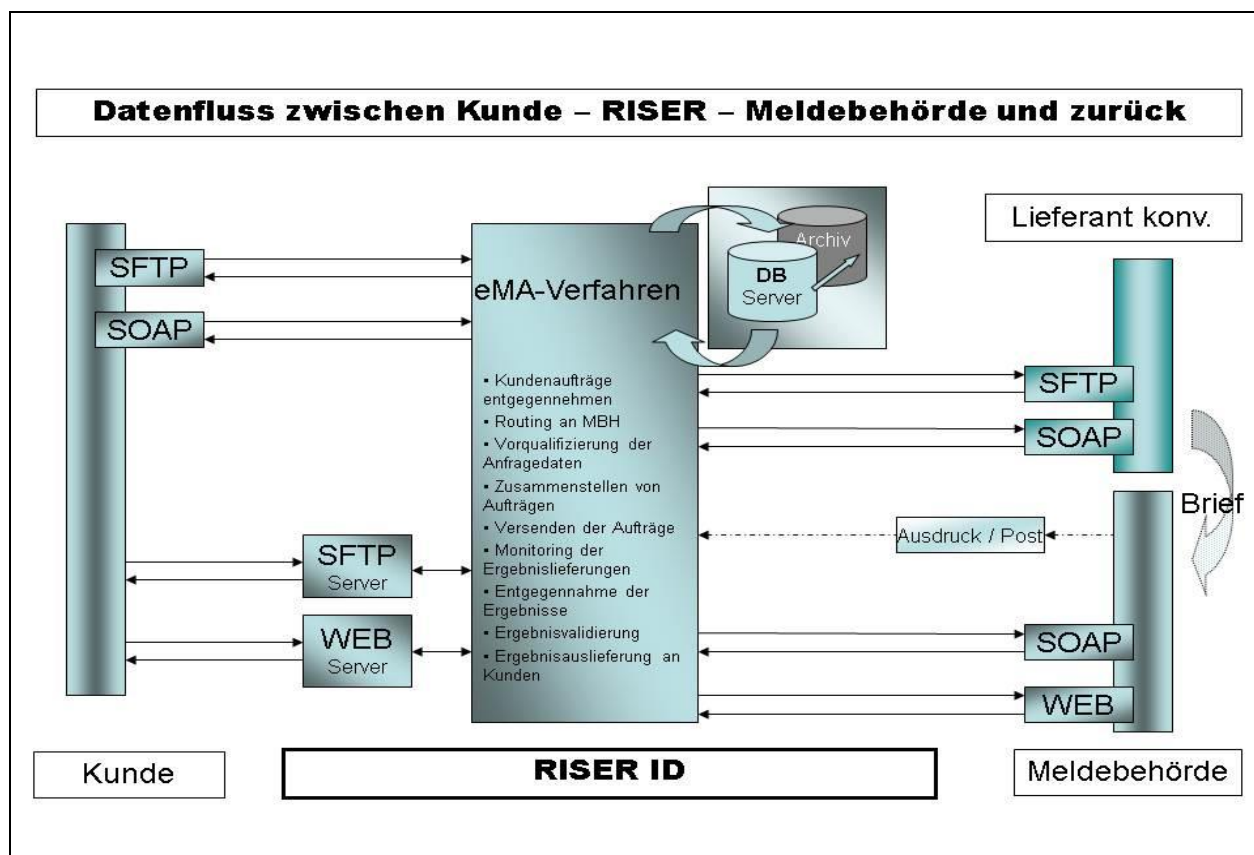


Figure 3 Data Flow – simple register information

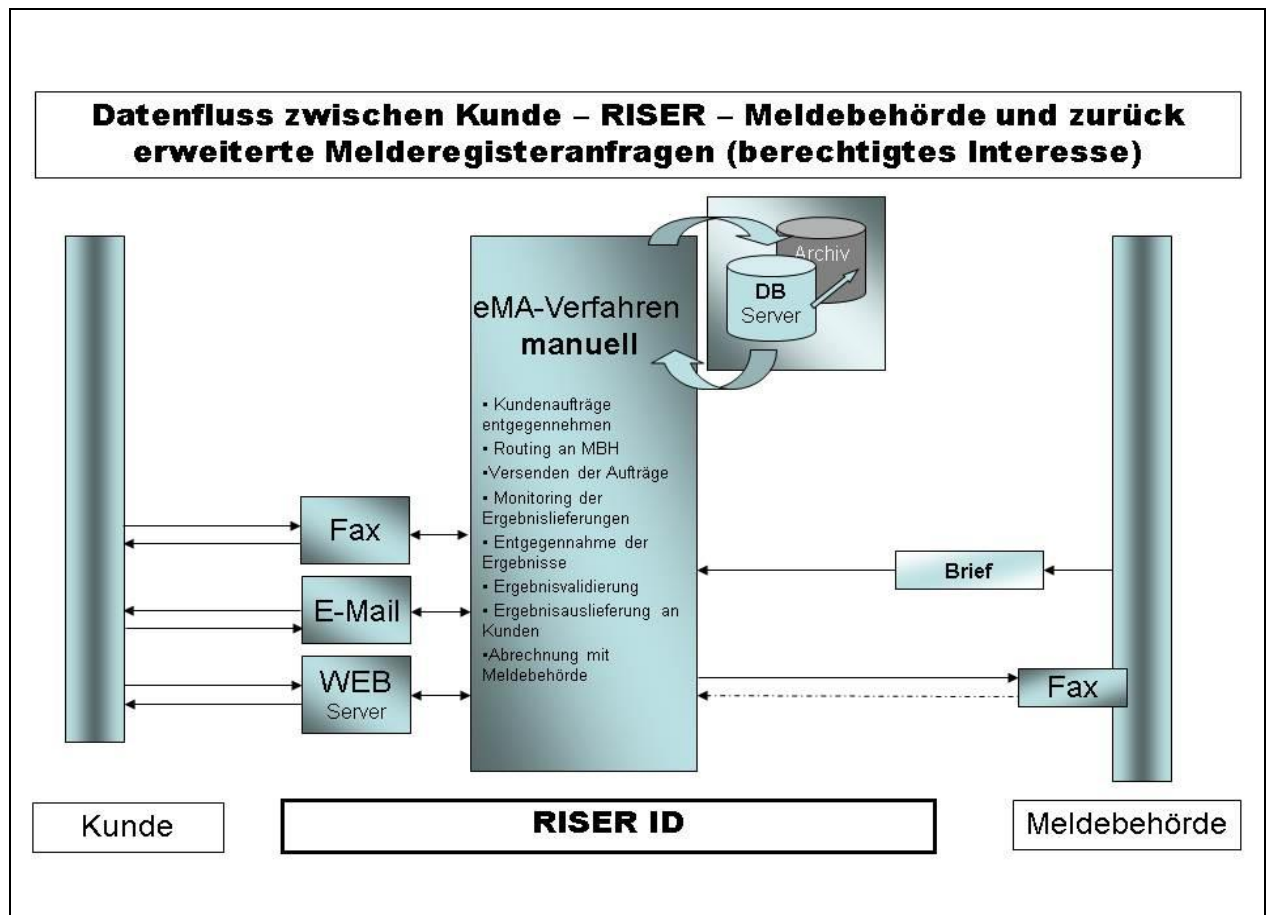


Figure 4 Data Flow – advanced register information

15. Privacy enhancing functionalities:

The scope of the data processing using RISER is tailored to the data required by the respective registration authorities. It can be stated that RISER serves the purpose in terms of data minimization and data avoidance, to process as few data as necessary and at the same time only relevant data. RISER is constantly optimized for this purpose. The current, informative and user friendly information to RISER enables the user exemplarily, to protect rights of persons affected.

16. Issues demanding special user attention:

None.

17. Compensation of weaknesses:

There is no need for compensation since there is no weakness.

18. Decision table on relevant requirements:

<i>EuroPriSe Requirement</i>	<i>Decision</i>	<i>Remarks</i>
Data Avoidance and Minimisation	excellent	The scope of the data processing using RISER is tailored to the data required by the respective registration authorities. It could be stated that RISER serves the purpose to process as few data as necessary and at the same time only relevant data. RISER is constantly optimized for this purpose.
Transparency	excellent	Documentation and data protection statement are informative, up-to-date and easy to understand.
Technical-Organisational Measures	adequate	Physical access protection, logging mechanisms, backup and recovery mechanisms, incident management and tests and release procedure follow a well-structured approach and are up-to-date and appropriately implemented.
Data Subjects' Rights	adequate	Transparent and up-to-date documentation on data protection and IT security enables users adequately to fulfil the rights of the individuals affected

Experts' Statement

We affirm that the above-named IT product / IT-based service has been evaluated according to the EuroPriSe Criteria, Rules and Principles and that the findings as described above are the result of this evaluation.



Bremen, 2016-02-22 Dr. Irene Karper LL.M.Eur.

Place, date	Name of Legal Expert	Signature of Legal Expert
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Bremen, 2016-02-22 Ralf von Rahden

Place, date	Name of Technical Expert	Signature of Technical Expert
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Recertification Result

The above-named IT product / IT-based service passed the EuroPriSe evaluation.

It is certified that the above-named IT product / IT-based service facilitates the use of that product or service in a way compliant with European regulations on privacy and data protection.

Bonn, EuroPriSe Certification Authority

Place, Date	Name of Certification Body	Signature
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