

# Processing activities register

[www.CV-Template.com](http://www.CV-Template.com)

## Revision information

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## Definitions

In this document, we made a distinction between the following **types of personal data**:

- Normal data (name, address, date of birth etc.)
- Special data (unusual or sensitive data, e.g. religious information.)

A distinction between the **types of processing**:

- Save
- Update/modify
- Use
- Delete

A distinction between **function roles**:

- **Support employee** is a person that can only access emails to help the user with questions. This role has no access to the CV-Template server/database.
- **Developer** is a person that is hired with the approval of the organization manager to develop a reliable and safe (back-end) system. This role is able to access the server/database/log files.
- **Administrator** is a person that is responsible for both the Engineer and Support role. This role is able to access the front-end server and database.

## The personal data to be processed

Data	Name, Email Address, Privacy policy/age acceptance, Accepted Email List,
Data Type	Normal Data
Processing Type	Save, Update/modify, Use, Delete
Available to	The developer and administrator can access the data
Purpose	1. Registration of an account. Linking of CV's/Cover Letters, Personality test and referrals to the account.
Storage time	After a deletion request has been made, we will implement this action within 2 weeks.

Data	CV/Cover Letter
Data Type	Special Data
Processing Type	Save, Update/modify, Use, Delete
Available to	The developer and administrator can access the data, but only will do so with an explicit request by email.
Purpose	1. Retrieve document within the CV builder, generating image previews, generating PDF export.
Storage time	After a deletion request has been made, we will delete the individual document after 30 days physically.

Data	CV-Score, Email Address
Data Type	Normal Data
Processing Type	Save, Use
Available to	The developer and administrator can access the data, but only will do so with an explicit request by email.
Purpose	1. Send an email to the user containing the report URL
Storage time	Duration of the users' account - or until a deletion request has been made

Data	Personality Test
Data Type	Special Data
Processing Type	Save, Update/modify, Use, Delete
Available to	The developer and administrator can access the data, but only will do so with an explicit request by email.

Purpose	1. Helping the user to improve user's CV on an emotional level.
Storage time	Duration of account.

Data	Referrals
Data Type	Special Data
Processing Type	Save, Use, Delete
Available to	The developer and administrator can access the data, but only will do so with an explicit request by email.
Purpose	1. Counting referrals of the user in order to unlock thank-you gifts and to send email notifications.
Storage time	Duration of account.

## Security Measurements

The processor is aware of the processing of possibly sensitive data and adjusts its security procedures to this.

- All services are hosted on a virtual server with a sharply set firewall and access protocols.
- We have installed a SSL certificate
- CV pictures from accounts are stored separately and are not accessible by using the URL without authentication.
- Access to the virtual servers is only granted to a combination of authorized persons, authorized devices and specific geographic locations established by the processor.
- Within the server application, we check at multiple levels whether the authorized user may view certain data.
- The root login is disabled from direct access and we blacklist IP addresses after too many false server login attempts.
- The server application and its dependencies are regularly updated.
- The server application is regularly checked for vulnerabilities as stated in the OWASP top 10 (the Open Web Application Security Project). Vulnerabilities found are immediately corrected.

## Contracted sub-processors

The Processor has permission from the Responsible Party to deploy the following sub-processors in the execution of the Service:

Name Organisation	TransIP
Description service	Providing and maintaining CV-Template's servers
Degree of Processing of Personal Data	All data to be processed are stored on a TransIP server. TransIP has no access to these personal data in any way possible
Data Storage	Netherlands (Amsterdam)

Name Organisation	Google (Google Analytics)
Description service	Giving insight into how users navigate about the products of CV-Template.
Degree of Processing of Personal Data	Anonymised IP address, cookie number and browser data are processed by Google. These data are explicitly not shared with third parties of Google and persons outside the domain of Processor.
Data Storage	Distributed over Google data centers worldwide

Name Organisation	Braintree (PayPal)
Description service	Payment Gateway Creditcard and Paypal
Degree of Processing of Personal Data	Anonymised creditcard, paypal address, name, email address, customer ID, Payment Token, Expiration Data, Credit Card Unique Identifier
Data Storage	Located in the European Economic Area

Name Organisation	Mollie
Description service	Payment Gateway iDeal
Degree of Processing of Personal Data	Name, IBAN, BIC
Data Storage	Server Mollie

Name Organisation	Taxamo
Description service	Calculate local VAT and provide tax authorities with the evidence

Degree of Processing of Personal Data	IP address, country, available other supporting evidence
Data Storage	Taxamo servers

Name Organisation	Mousend
Description service	Sending emails and giving anonymous insight into how users react on those emails.
Degree of Processing of Personal Data	Email address, name
Data Storage	Mousend server



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