Data Protection – U4 Services FAQs

How Unit4 handles Customer Personal Data

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Contents

FAQs: How Unit4 handles Customer Personal Data

1. Where does Unit4 process customer personal data?

As a general rule, we process personal data you provide to us <u>in your local region</u>. We do sometimes process personal data outside your local region as required for particular service elements, for example:

- for the provision of urgent support for applications and SaaS infrastructure supported by Unit4 colleagues around the world using a follow-the-sun model.

- where customers request certain professional services,

- where certain sub-processors are involved in the services you purchase,

- when services are provided at your request by our partners, as explained in more detail below.

2. Does Unit4 process data outside the UK/EU?

Unit4 is a global organisation and processes personal data in the different locations in which it is established to provide services to its customers. Wherever practically possible, Unit4 processes personal data in the region (or country) in which the customer is located, but Unit4 does transfer personal data for processing outside the UK and the EU/EEA ("**UK/EU**") in certain circumstances depending on the products and services. It is important to note data storage / residency remains within the geo-political zones and data centre locations listed in the relevant product cloud service description [here](#).

As set out in the Details of Processing available [here](#), Unit4 offers support services from offices in Europe and in other locations outside the UK/EU depending on what is agreed with you. For most products, the current global hubs for support (outside the EU) are found in the US, Canada, Malaysia, Singapore and Indonesia.

Application support will as a general rule always be provided from your local territory; or the global support centre in Wroclaw, Poland (to the extent possible). Occasionally, more complex technical support requirements may be handled by specialists who could be in any of the jurisdictions listed in the Details of Processing (which include locations outside the UK/EU). Please note that unless you input or attach additional customer personal data to support tickets, the only information transferred to support specialists is the name and email address of the person logging the support ticket.

Cloud operations support may be provided by members of Unit4's cloud operations team from various Unit4 locations depending on the issue, time of day and data centre where customer data is stored.

For customers deployed using Microsoft Azure infrastructure, cloud operations support may be provided from Unit4 locations specified in the [List of Sub-processors](#). In practice, we will deal with cloud operations issues within office hours from the location closest to you geographically.

Urgent issues that cannot wait until working hours of the cloud operations team closest to you may be addressed by members of cloud operations in any of the territories listed in the Details of Processing in accordance with our 'follow-the-sun' support model. Again, the cloud operations team accesses personal data only on a very exceptional basis and where absolutely essential.

Confidential and Proprietary

Please note that while this access to data can be considered a transfer of personal data for the purposes of GDPR, the data itself is not sent outside your local territory – it may simply be accessed from outside the territory.

Consultancy and professional services are only normally provided from Europe and the UK.

Depending on the services used by the customer and its choices, Unit4 also transfers personal data to those sub-processors listed on the website here and may also transfer certain personal data to those ISV Partners set out in the sales order who will process customer personal data based on the processing policies of that ISV partner. In those cases, ISV partners are normally processors of customer data and not sub-processors of Unit4.

3. What is the legal basis for international transfers?

It depends on the service/product, but international data transfers to Unit4 affiliates are made:

- On the basis of EU adequacy decisions; or

- Under the terms of the EU/US Data Privacy Framework; or

- On the basis of EU and UK Standard Contractual Clauses which Unit4 incorporated into a data transfer agreement concluded with another Unit4 affiliate.

4. Do Unit4 sub-processors process data outside the UK/EU?

Unit4 uses various sub-processors which are engaged to provide parts of the SaaS service which Unit4 delivers to customers (IaaS, support ticketing, community login access). To perform that service, it may be technically necessary, in some circumstances, to transfer personal data outside the UK/EU to such sub-processors or for those sub-processors to make similar onward transfers outside the UK/EU, even where data is received by sub-processor from Unit4 within the UK/EU.

Details of all sub-processors can be found here. Where sub-processors handle personal data in countries outside the UK/EU, international data transfers are made:

- On the basis of EU adequacy decisions; or

- Under the terms of the EU/US Data Privacy Framework; or

- On the basis of EU and UK Standard Contractual Clauses which Unit4 incorporated into a data transfer agreement concluded with another Unit4 affiliate..

Conapto (a colocation centre for Unit4 owned infrastructure): For Nordic customers who chose Conapto for their SaaS service, Conapto will **not act as a data processor** as no customer personal data is transferred in the colocation. Conapto has no access to customer data.

5. Where can I find details of ISV Partners data processing?

ISV Partners normally act as independent processors of customer information (as opposed to sub-processors) depending on the ISV Partner. Further information about that processing can be found here under the section Third-Party Terms and the individual ISV Partner's website and processing policies.

6. What technical and organisational measures does Unit4 use?

The technical and organisational safeguards which Unit4 uses to protect personal data are summarised in the Security Measures (Technical and Organizational) document available here. The security measures in place are appropriate and proportionate as required by the GDPR, based on Unit4's Certification and Compliance Frameworks including ISO27001, ISO27017 & ISO9001, SOC1 & 2, Type II and UK Cyber Essentials (where applicable) and include technical, contractual and organisational controls.

Service	ISO9001	ISO27001	ISO27017	SOC1	SOC2	UK Cyber Essentials
Unit4 SaaS Azure, U4F, ERP, FP&A, People Platform	✓	✓	✓	✓	✓	✓
Unit4 SaaS Nordic DC, ERP, FP&A, People Platform	✓	✓	✓	✓	✓	
Unit4 SaaS ERPx, Talent Management, U4PM, U4 Webinfo	✓	✓	✓	✓	✓	

7. Has Unit4 carried out Transfer Impact Assessments (TIAs)?

Yes, Unit4 works hard to draft and keep up to date those TIAs required when personal data is transferred in reliance on standard contractual clauses.

8. Can Unit4 provide copies of TIAs?

We are happy to provide a summary of the scope and findings but not the TIA documents themselves. We consider these to be commercially sensitive documents. Should customers want to prepare their own TIAs or DPIAs, Unit4 is happy to point customers towards relevant information to allow them to do so.

9. Can Unit4 complete a DPIA questionnaire?

Unit4 makes all relevant information relating to the processing of customer personal data on its website and in these FAQs. Unit4 will provide all reasonably necessary information requested by Customer to allow it to complete its own DPIA, but (in general) cannot answer individual questionnaires.

10. Can Unit4 provide a copy of its Global Intra-group Data Transfer Agreements or agreements with its sub-processors?

We consider this to be commercially sensitive and Unit4 can provide information relating to these documents as required, but not copies of the document itself.

11. What does Unit4 do with data on termination of the contract?

At the end of the contract, the customer may choose whether Unit4 will return a copy of the customer data held in the customer database to the customer, or whether Unit4 must simply delete the data. If the customer has not indicated its choice to Unit4 within 30 days of the end of the contract, Unit4 will simply delete the data, subject to the following limited exceptions:

- we retain customer service logs for a year from their date of creation and these will contain any personal data provided as the customer goes through the customer service request process; and

- Otherwise, Unit4 will only retain a copy of the customer data if it is subject to a legal or regulatory requirement to do so.

12. Does Unit4 use customer data to improve its products and services and produce analytics?

Yes, as described in our General Terms of Business, we will use any data processed by the services to produce analytics and to improve Unit4 services by providing information to machine learning mechanisms and by making use of algorithms. Analytics that are made available to a third party (i.e. another customer or prospect of Unit4) will not contain any personal data nor will they identify customer. We will not enter customers' confidential information personal data in tooling that allows such data to become part of a publicly searchable database (i.e generative AI tooling).

13. Can you provide an example of Analytics?

Analytics are documents that utilise the information Unit4 gathers from its customers use of the system to demonstrate best practice and how the products can benefit other customers, by purchasing Unit4 solutions or changing the way they use them. Unit4 will never disclose any personal data or client confidential information in analytics it provides to another customer or prospect and those analytics would never disclose the name of a customer to another customer or prospect. It may, for example, say "another client in the retail space, uses the product like this…".

14. Can you provide an example of machine learning or AI?

Unit4 has services that use the data they consume to improve the way they work. Receipt recognition is a service that reads the data in a receipt (submitted for expenses) and pre-populates an expenses form based on what it reads (this is then qualified / checked by the human user). It uses AI/machine learning to improve how accurate it is at reading the receipts and improves with each data point it consumes into the service.

15. Does Unit4 offer any services that further restrict the processing (e.g. transfer) of customer personal data?

If customer has stricter requirements (due to sector or its own customer restrictions), there may be some additional chargeable Unit4 services that may be able to assist customer in further restricting the access to personal data from jurisdictions outside the EU/UK. If you want to discuss these further, you should reach out to your sales representative or customer success manager as applicable.