

Technical and Organizational Measures for Make

Last update: September 2023

This document describes the requirements and implementation of measures for secure and compliant processing of personal data.

1. Confidentiality

1.1 Entry control

Measures for preventing unauthorized individuals from accessing the premises where personal data are processed:

Make has implemented the requirements in the following manner:

X	Locked building
X	Electronic security locking system
X	Mechanical security locking system
X	Documented key issuance

X	Locked server rooms with entry control
X	Locked server cabinets
X	Visitor registration and monitoring
X	Daily security service for offices and building

1.2. Access control

Measures for preventing unauthorized individuals from accessing the personal data processed digitally:

Make has implemented the requirements in the following manner:

X	Personalized user accounts
X	Complex Passwords
X	Central authentication
X	Access blocked after five incorrect password entries
X	Systems access is logged and monitored

X	Encrypted employee laptops
X	Secure line connection for external access (VPN)
X	Use of an up-to-date firewall
X	Multifactor access control

1.3 Usage control

Measures for restricting and monitoring accesses to personal data:

Make has implemented the requirements in the following manner:

X	Role-based authorization process
X	Authentication with unique username and password
X	Logging user access and data processing
X	Allocation of authorizations only after approval by the data owner

X	Protected access to data storage media
X	Secure destruction of paper documents
X	Encryption of data at rest
X	Minimization of superuser access

1.4 Personal data minimization

Measures to minimize the use of personal data:

X	Processing of personal data restricted to the minimal required for the defined purpose
---	--

X	Pseudonymization of personal data whenever feasible
---	---

1.5 Separation control

Measures for separating personal data by means of various storage locations or logical separation:

X	Separation of productive and test systems
---	---

X	Separation of personal data with the data processing systems
---	--

2. Integrity

2.1 Transmission control

Measures to ensure that personal data cannot be read, copied, altered or removed by unauthorized persons during transmission:

X	For data in transit required AES-256 encryption.
X	The use of private data storage media is prohibited

X	Special protection when physically transporting data storage media
X	Connections to the infrastructure by employees are encrypted end-to-end

2.2 Input control

Measures to ensure that it is possible to check and establish retrospectively whether and by whom personal data has been processed:

X	Traceability when assigning, changing and deleting user authorizations
---	--

2.3 Contractual order control

Measures to ensure that the personal data processing carried out on a subcontracted basis takes place exclusively at the instruction of the Controller:

Make has implemented the requirements in the following manner:

X	Documentation of processing activities
X	Careful selection of processors (detailed assessment of provided guarantees)
X	No use of processors who have not entered into agreement pursuant to Article 28 GDPR where applicable

X	Written agreement with the processor on the data protection minimum standard
X	Assuring compliant destruction or return of data upon completion of the assignment

3. Availability and reliability

Measures for protecting personal data against accidental destruction or loss:

X	Regular documented patch management for servers
X	Regular documented patch management for endpoint devices
X	Mitigate and remediate any confirmed zero-day vulnerabilities
X	Recovery procedures are established and tested at least annually

X	Physically separate redundant data storage or backup data
X	Uninterrupted power supply
X	Early fire detection in office buildings

4. Procedure for routine review, assessment, and evaluation

Measures for monitoring personal data protection and for verifying appropriateness of established technical and

organizational measures:

X	Appointment of a data protection officer where required
X	Regular documented training of employees involved in data processing
X	Documented procedure for introducing, modifying, and discontinuing procedures

X	Regular audits by independent third parties
X	Regular review of the latest technical standards pursuant to Article 32 GDPR
X	Regular auditing or other suitable verifications of the processors