



REVERSIBILITY OF SAAS SERVICES

Objectives

The saas solutions provided by ACCA software S.p.A. allow the interoperability of information systems between customers and applications in use at our Cloud infrastructure. The concept of reversibility foresees that it must always be possible to migrate the Customer to another Supplier with consequent permanent elimination of the data owned by the Institution at the end of the migration procedure. Reversibility is the process through which the Customer, in anticipation of the termination of the contractual relationship with the Supplier, is able to recover all its data stored by the service.

Field of application

This procedure defines the manner in which ACCA software S.p.A. prepares for the recovery of data and the subsequent activities carried out by ACCA software S.p.A. for the definitive elimination of data from its information systems.

Normative references

- ISO/IEC 27000:2016 'Information technology -Security Techniques -Information security management systems - Overview and vocabulary';
- ISO/IEC 27001:2013 'Security techniques - Information security management systems - Requirements';
- ISO/IEC 27002:2013 'Information technology -Security techniques -Code of practice for information security controls';
- ISO 31000:2009 'Risk management - Principles and guidelines';
- Legislative Decree 231/2001 -Discipline of the administrative liability of legal persons, companies and associations, including those without legal personality;
- European Regulation 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data, as well as the free movement of such data and repealing Directive 95/46/EC ("GDPR" or "Regulation");
- Legislative Decree 196/2003 -Personal data protection code;
- Privacy Guarantor's Resolution No. 13 of 1 March 2007: Use of e-mail and the Internet;
- Order of the Garante Privacy of 27 November 2008: system administrators; amended by Order of 25 June 2009;
- Decree-Law 148/2017 and Copyright Law L. 172/2017;
- Legislative Decree 30/2005 -Industrial Property Code -and subsequent Legislative Decree 63/2018;

Area of competence

The reversionary process requires that on the date of termination of the contract with the customer, the customer sends an initial formal request by PEC to: acca@pec.it



The received Certified Mail, after appropriate registration, is forwarded to the relevant service department, which will then proceed with the service activation process, described below.

Utilization of the service, the purchasing Customer is asked to identify the two users with their authorisation profiles to whom access to the service will be granted at the end of the service with limited functions for viewing and extracting Customer data.

At the end of this thirty-day period, the users referred to in the preceding points receive an automatic message by e-mail from the system informing them that the period of access to limited functions for viewing and extracting data has expired, and a notice that, after thirty days have elapsed, access will be blocked. During these thirty days, authorised users receive reminders, by e-mail, of the approaching expiry date.

During the initial period (the first thirty days), designated users, accessing the system normally, can download data, documents generated by the system during the contractual period via the SaaS service, and any documents attached by users.

At the end of the thirty-day period, all users are blocked and the customer is no longer able to access the service.

Following the complete deactivation of all users, the data is kept in the system for a safeguard period of a further 30 days for any extraordinary requests for data and/or document extraction by the customer. At the end of the safeguard period, all data of the purchasing Customer are deleted from the system.

The procedure for removing customer data from the system is managed by the technical department and involves the removal of the individual database containing all and only customer data including all application logs.

A further check by the technical department for the correct deletion of the purchaser's PA data is planned at the end of the data retention period.

The entire procedure is properly documented and verified by two operators in the technical department.

Email Reminder *(First Reminder):*

Subject: Important Notice: Termination of Cloud Service Access

Dear [Recipient's Name],

We would like to inform you that the Cloud Service you've been utilizing has been terminated. Your user account will remain active for the next 30 days, allowing limited functionality restricted to viewing and retrieving data based on your specific authorization profiles.

During this period, we encourage you to access the service as usual to extract any data and documents of your interest. After the thirty-day period, your user account will be permanently disabled, resulting in the loss of access to view and extract data from the system.

Following the final termination date and the subsequent disabling of your user account, the data will be securely retained for an additional thirty days. If you find the need for further assistance during this safeguard period, please feel free to reach out to our technical department via certified mail at acca@pec.it.

Thank you for your understanding and cooperation.

Best regards,



The text of the subsequent reminders (at 10 days and 1 day after expiry) is:

Subject: Urgent Reminder: Account Deactivation in ... Days

Dear [User's Name],

This is a friendly reminder that your user account credentials, providing access to the Cloud service, will be permanently disabled in ... days. To ensure uninterrupted access to your data, we kindly invite you to log in and proceed with the extraction of any necessary documents at your earliest convenience. If you have already completed this process, please disregard this communication.

It's important to note that even after the permanent deactivation date, your user data will be securely retained for an additional 30 days. Should you require further assistance during this safeguard period, feel free to contact our technical department via certified mail at acca@pec.it.

We appreciate your attention to this matter and remain at your disposal for any queries.

Best regards,