

Document Control

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2.0	Annual update	15.12.2023	Master IDP Coordinator

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1 Purpose of the Document

The document details information about a training on "Individual Data Processing". Individual components of the training and subsequent explanation are well descripted in this Document.

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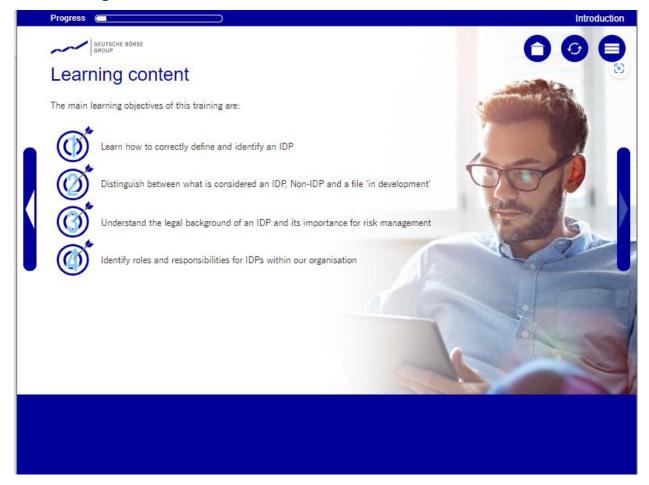
2 Introduction

The training is designed to provide you with a clear understanding of Individual Data Processing (IDP), its importance, and your responsibilities when processing business-relevant information.

The training is divided into three core chapters:

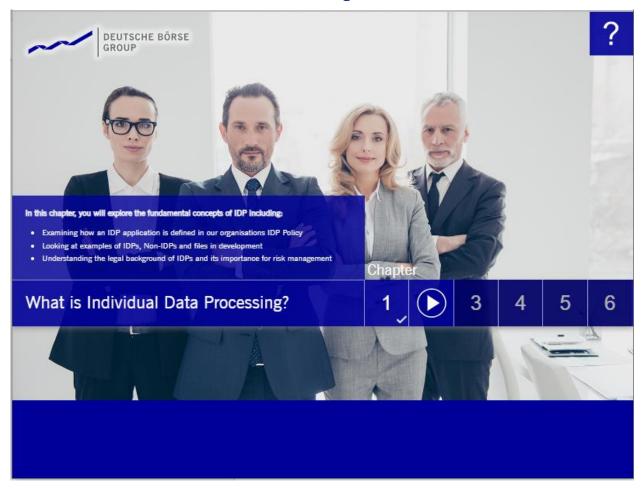
- 1. What is an IDP?
- 2. Roles and Responsibilities concerning IDPs
- 3. The IDP Lifecycle.

2.1 Learning Content

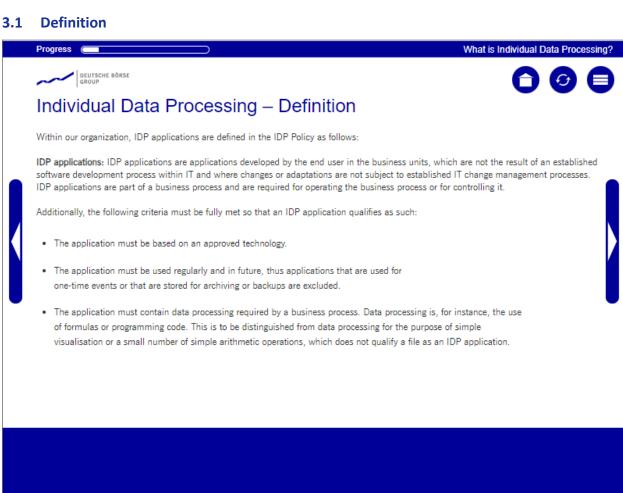


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3 What is "Individual Data Processing"?



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3.2 Deviations

Progress What is Individual Data Processing?









Individual Data Processing - Deviations

The IDP Policy also contains deviations which, if applicable, would require for an application to be classified as an IDP.

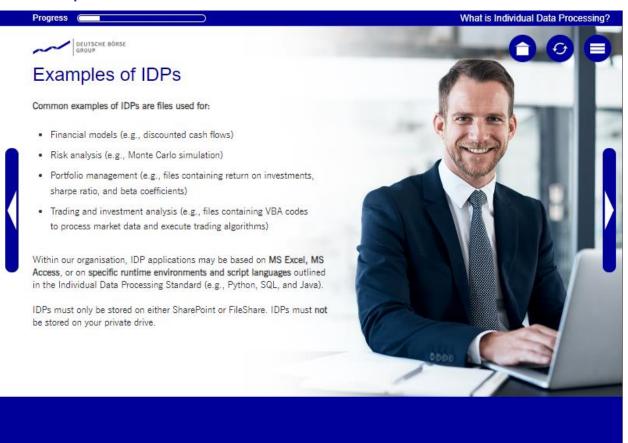
Deviations

- Deviating from point <u>2</u> are applications developed by the end user in the business units that are used once in a recurring process and that have a direct regulatory or legal relevance (particularly, regarding annual financial statements, tax, risk management, and external reporting). These are to be classified as IDP applications.
- Deviating from points 2 and 3 are such files that are directly used for external reporting. These are to be classified as IDP applications.

Understanding the definition and deviations is crucial for correctly identifying and managing IDPs within our work environment.

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3.3 Examples of IDPs



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3.4 Examples of Non-IDPs









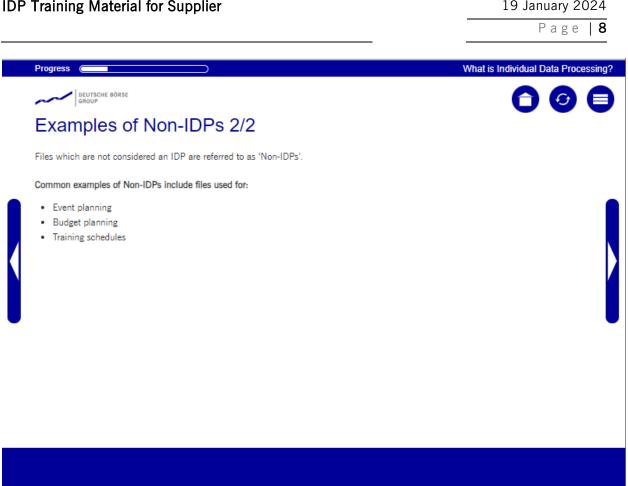
Examples of Non-IDPs 1/2

Files which are not considered an IDP are referred to as 'Non-IDPs'. The non-exhaustive standalone criteria in the left column of the table below is to be used as guidance to understand what **does not** constitue an IDP.

What does it mean?
The data processed in the file is NOT (part of) the necessary input which contributes to the output of the business process (i.e., it does not operate or control the business process). For example, a file with complex formulas which assigns secret Santas across different departments.
For example, the logic of the file can be understood by a qualified third person within a short period of time (5-10 minutes). This person can be your direct colleague or another subject matter expert.
Simply containing confidential data which is not otherwise used as input for the output of a business process does not make the file an IDP, especially since confidentiality is controlled by other mechanisms according to the Information Security Policy.
For example, a report extracted from a data-analytics tool such as SAP Analytics (SAC).
For example, the simple statistics of successfully performed test cases, or data is not processed but depicted in graphs, statistics, aggregations for management decisions.
For example, a team member list, activity plans, project management.
For example, to complete a one-time project task.

Source: QUICK GUIDE for IDP Identification, Documentation, and Approval

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3.5 Examples of 'In Development' files

Progress What is Individual Data Processing? DEUTSCHE BÖRSE GROUP Examples of 'In Development' Files

A file 'in development' remains in this state until the file has been approved by the IDP Process Owner. This is the case if the work on the logic of the file is either not yet complete, or the file has not yet been fully documented, tested, or approved. Until then, it must not be used.

A file that is in development is not, however, considered an IDP or a Non-IDP, but rather has the status 'in development'.

Files must not be in the status in development for more than 180 days.

Examples of in development files include:

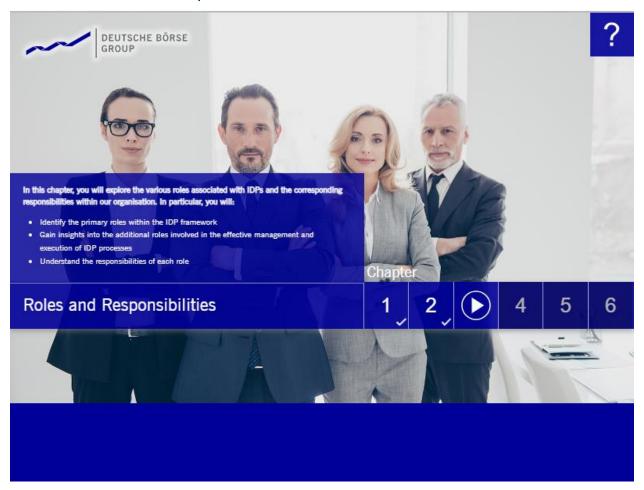
- · An Excel file whose formulas are still being developed and which, once successfully implemented, will be used to process business data.
- · A script file that is currently being tested with test data and, after successful implementation, will be used to read business data out of a database and transform or process the data.

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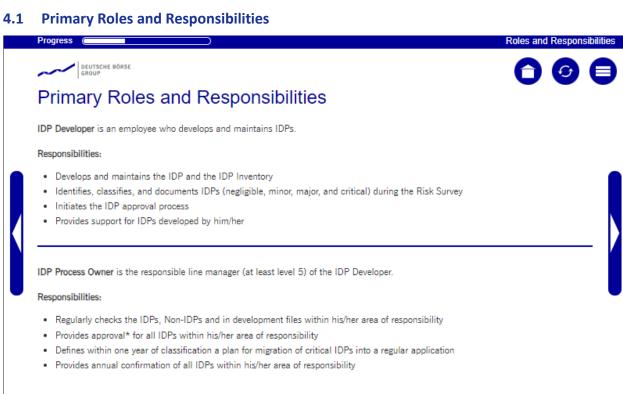


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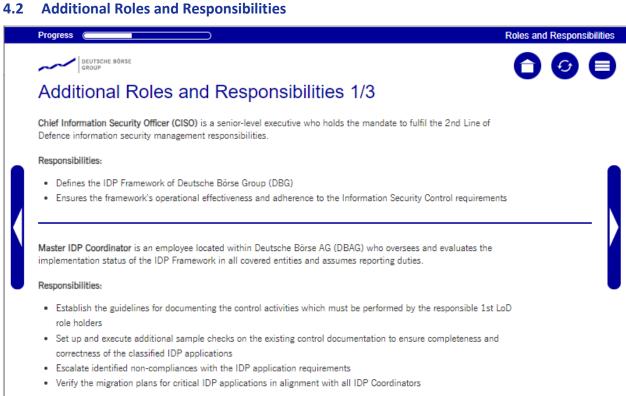
4 Roles and Responsibilites



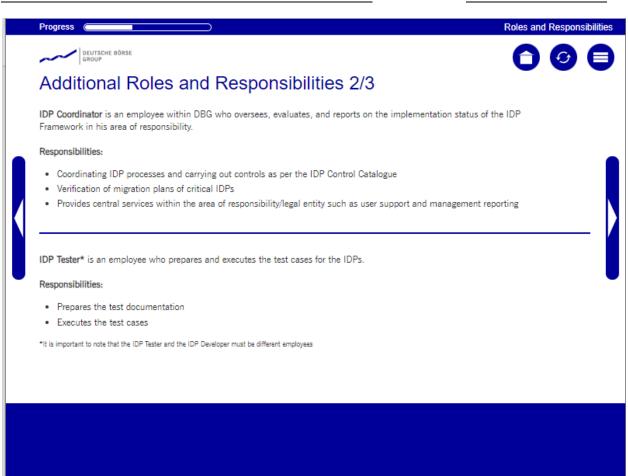
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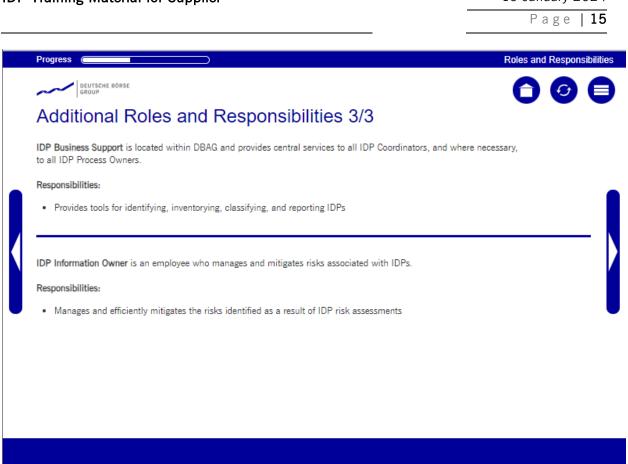
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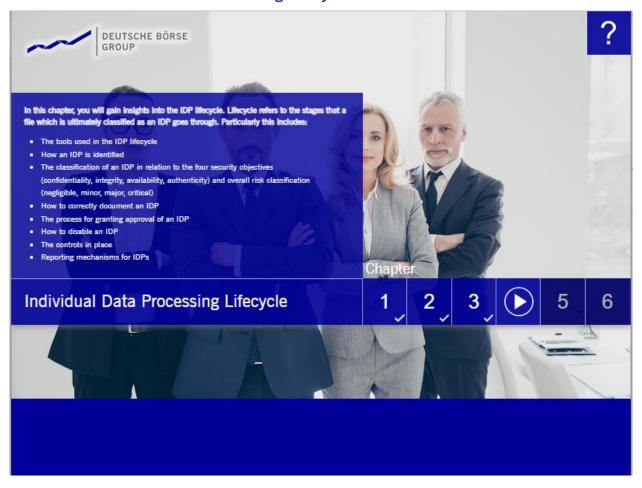


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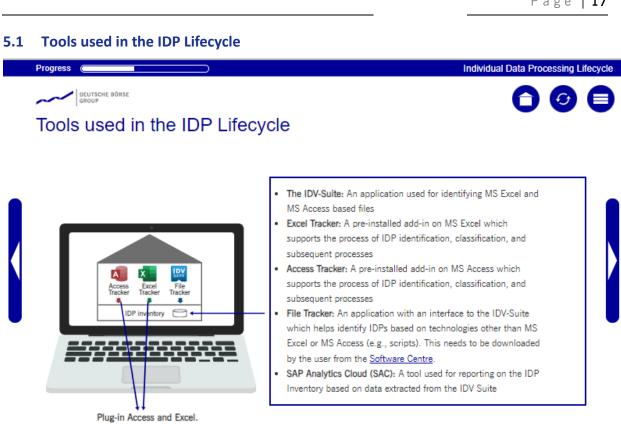


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5 Individual Data Processing Lifecycle

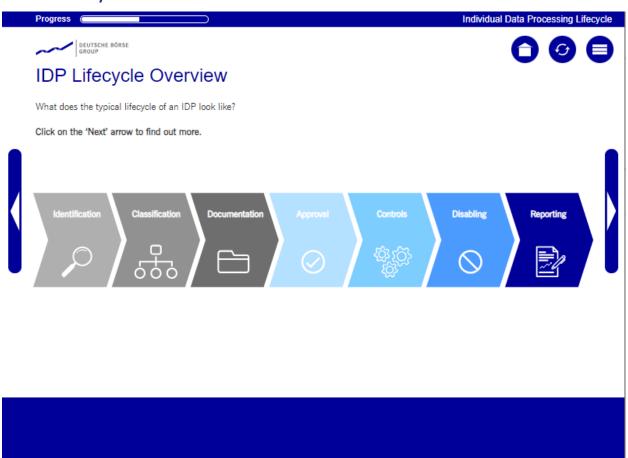


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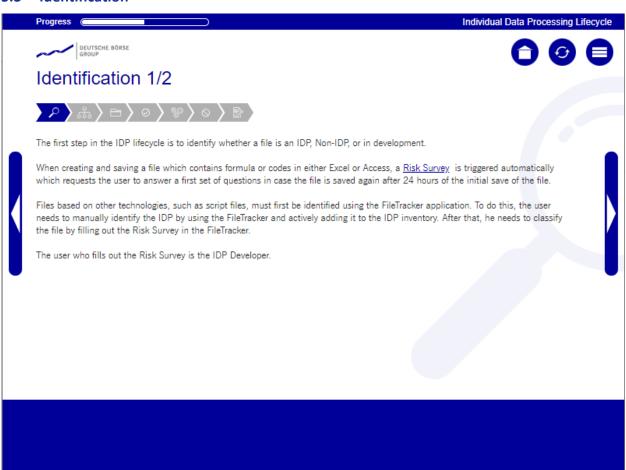
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5.2 IDP Lifecycle Overview

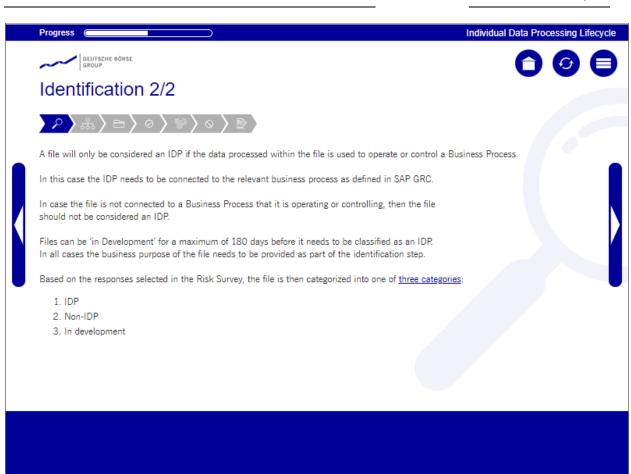


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5.3 Identification



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5.4 Classification

Progress

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Individual Data Processing Lifecycle







Classification



For files considered an IDP, the user is prompted via the Risk Survey to choose the risk classification of the IDP. The overall criticality of the file is derived from the four Information Security objectives. These are:

- . Confidentiality: The file is restricted to only those who are authorized to access it.
- . Integrity: The data or information contained in the file has not been altered or destroyed in an unauthorized manner.
- · Authenticity: The data contained in the file is complete and accurate.
- · Availability: The file is accessible and usable when an authorized entity demands access.

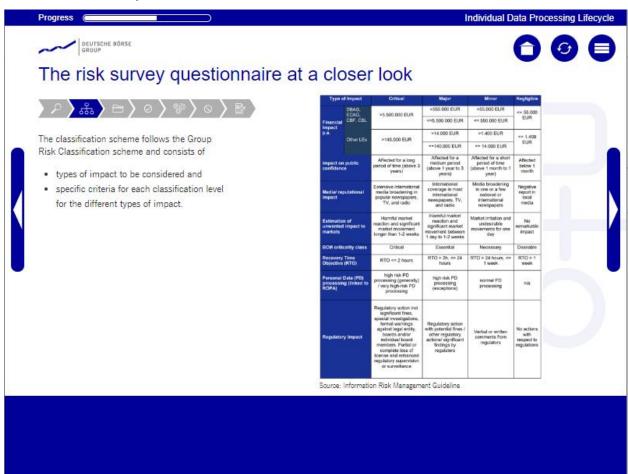
Within the Risk Survey, the user must answer <u>questions</u> related to the types of impact the IDP might have if a breach occurs (e.g., financial, reputational, media impact) and determine the specific classification level for the different types of impact. This must always depict the estimated maximum impact for each security objective in case of any possible breach. The user can click on the 'question mark' button in the Risk Survey if further information is required for each question.

The criticality of the IDP will therefore be one of the following classifications ranking from highest protection requirement to lowest protection requirement:

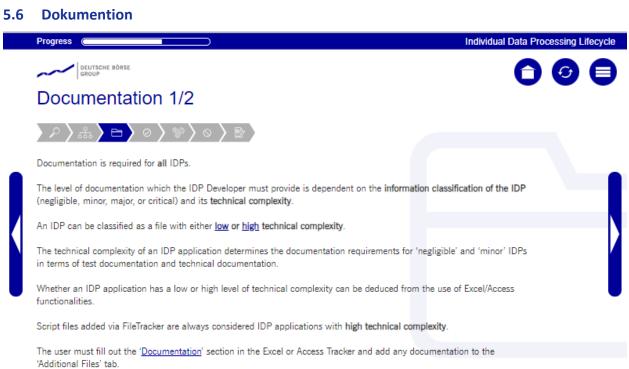
- Critical
- Minor
- Major
- Negligible

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5.5 The risk survey at a closer look



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Documentation 2/2



The following table shows which documents are required depending on the IDPs information classification.

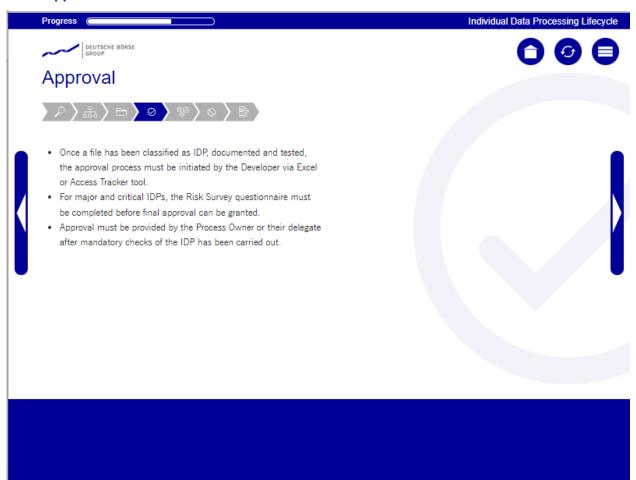
Documentation	'Negligible' and 'Minor' IDPs	'Major' and 'Critical' IDPs****
Business Purpose	Yes	Yes
Business Requirements	Yes*	Yes
Test Cases	Yes**	Yes
User Guide/Training Material	n/a	Yes
Technical Documentation	Yes**	Yes
Access Concept	Yes	Yes
Recovery Procedure	Yes***	Yes
Risk Assessment	n/a	Yes

- * If the file operates or controls more than one business process.
- ** Documentation requirements differ depending on whether the file is of low or high technical complexity
- *** If the standard protection requirements are not already met
- **** For IDPs that are classified as 'Major' or 'Critical' only for reasons of confidentiality, an access concept must be in place as a minimum requirement

Source: IDP Guideline V3.0

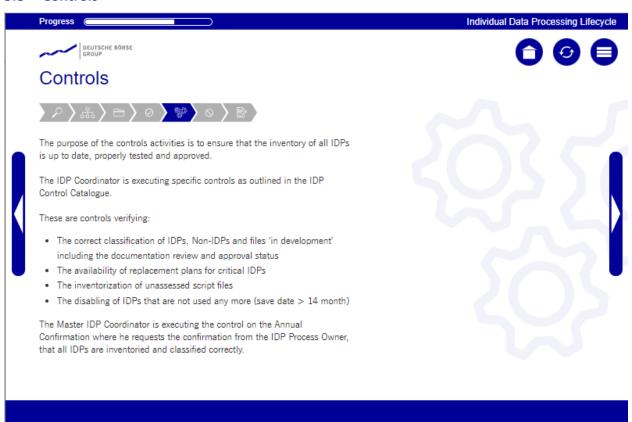
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5.7 Approval



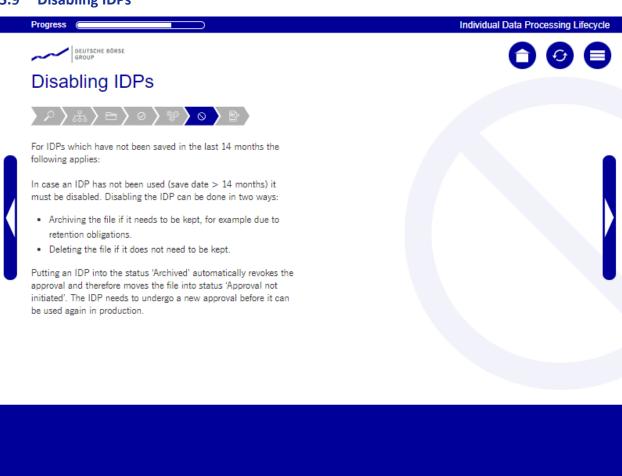
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5.8 Controls



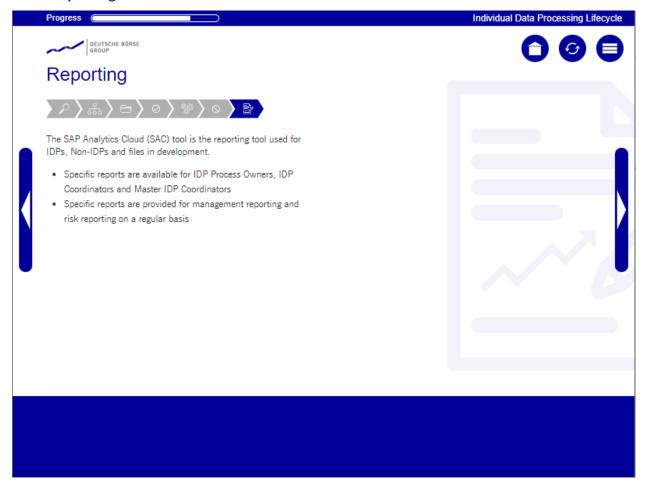
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5.9 Disabling IDPs



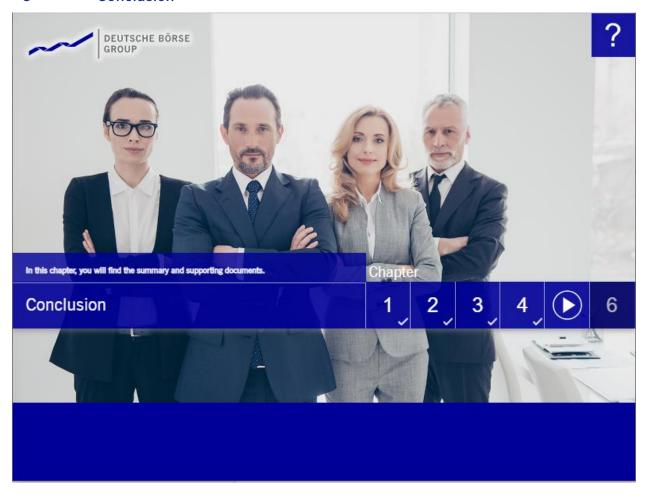
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5.10 Reporting



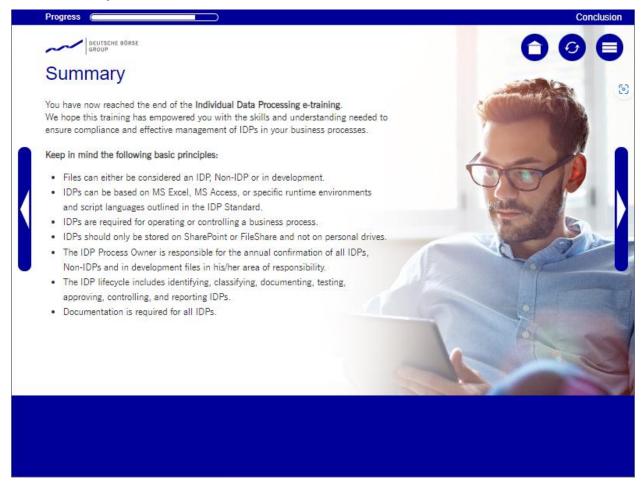
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6 Conclusion



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6.1 Summary



6.2 Important Link

https://deutscheboerse.sharepoint.com/sites/IN-Governance-and-Organisational-Services/SitePages/IDP.aspx