



SACHVERSTÄNDIGENBÜRO FÜR DATENSCHUTZ UND IT-SICHERHEIT

Report on the audit

IUM4cloud

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1 Mission and purpose

1.1 Facts on the case

In order to assess the compliance of the 'IUM4cloud' software developed by Accxia GmbH, Franz-Joseph-Straße 11, 80801 Munich, with the legal requirements for data protection in accordance with Regulation (EU) 2016/679 (GDPR) and the Federal Data Protection Act (BDSG) based on the GDPR, a review of the software was carried out on the basis of documents and information provided by responsible persons.

1.2 Contracting entity

Accxia GmbH is one of the largest cloud providers for Atlassian solutions. The reviewed software is part of Accxia GmbH's portfolio for the practical use of Atlassian services. The review was commissioned by Mr Patrick Pitschmann, Head of Private Cloud Solutions/Data Centre & Managed Services, Accxia GmbH.

1.3 Purpose

The purpose of the engagement is to analyse and evaluate the IUM4cloud software with regard to the fulfilment of the requirements for the handling of personal data required by the GDPR and the BDSG adapted to it.

It should be noted that this audit report is a description of a snapshot. Technical systems in general, computer systems and software in particular are subject to constant change. Threats can therefore constantly change or emerge.



1.4 Goal and procedure

The commissioned review was carried out by analysing provided documents, with information to the functions of the software, information to the installed infrastructure, service contracts with partners, and with information provided by responsible persons at Accxia GmbH. Based on this, a risk assessment was prepared with regard to the requirements of the GDPR and the BDSG for handling personal data. This audit report summarises the results.

2 Management summary

To summarise, it can be said that the **IUM4cloud software fully complies with the requirements of the GDPR and the BDSG** with regard to the processing of personal data



3 Software functionality

The IUM4cloud software enables licensed users of the Atlassian products Jira and Confluence to use the licenses more flexibly. The licences for these products are user-related. This means that a licence is permanently assigned to a user. Although not all users of a company in which these products are used work with the products all the time, companies are forced to purchase a licence even for users who only use Jira and/or Confluence occasionally

IUM4cloud enables the flexible use of a company's Atlassian licences. For this purpose, the IUM4cloud extension developed by Accxia GmbH has to be installed from the official Atlassian Marketplace to the Atlassian instance used by the customer. By this, the customer is able to create more users than licences available. The licences purchased by the customer from Atlassian are disclosed to IUM4cloud and managed by IUM4cloud. IUM4cloud allocates these licences dynamically to the users who are active in the system.

If the users end their sessions, the licences they are using are withdrawn and will be made available to other users.

Accxia GmbH provides the app via the Atlassian Marketplace. The Atlassian products are provided, hosted and operated by Atlassian. The data required for IUM4cloud (user, company, number of licences, etc.) is stored on Accxia GmbH servers in the data centre rented by Accxia GmbH. It is not possible to store the information required for dynamic licence allocation directly on Atlassian servers.

When a user logs in, IUM4cloud establishes a secure connection Accxia GmbH's data centre and assigns a licence. No data is shared with Atlassian in the process.



4 Use of personal data

Personal data in accordance with Art. 4 para. 1 GDPR is processed by both Atlassian and Accxia. In both cases, the processing is necessary for the fulfilment of a contract (Art. 6 para. 1 lit. b GDPR) and therefore lawful in accordance with Art. 5 para. 1 GDPR.

The use of the IUM4cloud software is only possible if the customer has purchased licences for the use of Atlassian products. As this audit report relates exclusively to the processing of personal data by Accxia's IUM4cloud software, all further explanations are therefore only related to the use of this software.

Users are created within the customer's Atlassian instance at Atlassian. When a user logs in, this information is used by IUM4cloud to check whether a licence is free and can be allocated. The information about which user is currently using a licence is stored by IUM4cloud on Accxia systems in the Accxia data centre. When the user ends their session, the licence is released. There is no data flow from Accxia systems to Atlassian systems.

IUM4cloud only stores the data required for licence management for the duration of the customer's use of the software. This fulfils the principles of purpose limitation, data minimisation and storage limitation of Art. 5 para. 1 GDPR.

5 Security of processing

The data required by the IUM4cloud software is processed in a data centre operated by Hetzner Online GmbH, Gunzenhausen.

The technical and organisational measures of Hetzner Online GmbH's data centres were audited by TÜV-Rheinland in February 2024. This audit report confirms the full implementation of the measures by Hetzner Online GmbH



Furthermore, the data centres of Hetzner Online GmbH are certified in accordance with ISO 27001:2023. A certificate from FOX Certification GmbH, 87642 Halblech, valid until September 2025 is available.

A data handling contract in accordance with Art. 28 GDPR between Accxia GmbH (client) and Hetzner Online GmbH (contractor) is also in place and up to date. An order processing contract between Accxia GmbH (contractor) and its customers (client) is in place and is offered to users of the IUM4cloud software.

The connection between the data centres is established exclusively by the IUM4cloud software in the event of a user login to check licence availability. Connections between the data centres and between the server systems are SSL-encrypted.

Maintenance and operation of the IUM4cloud software is carried out exclusively by Accxia personnel. Access by maintenance personnel to the servers in the data centre is only possible with personalised 4096 bit SSL keys. The SSL keys are generated by Accxia. The generation and allocation of SSL keys follows a process approved by the management of Accxia GmbH. All employees of Accxia GmbH are bound to confidentiality. The management of Accxia GmbH has introduced an IT security guideline that applies to all employees. Annual security briefings take place.

The requirements of Art. 32 GDPR and Section 64 BDSG on the security of processing, as well as the principle of confidentiality and integrity of Art. 5 (1) GDPR are fulfilled.



6 Result

After examining the documents submitted to me, as well as the information received from responsible persons at Accxia GmbH, I have come to the conclusion that the **principles of processing personal data** of Art. 5 para. 1 GDPR **are fully complied** with when using the software IUM4cloud of the manufacturer Accxia GmbH.

The requirements regarding security of the processing of personal data in Art. 32 GDPR and Section 64 BDSG are also met.

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7 Concluding remarks

This report has been prepared by me personally to the best of my knowledge and belief. I hereby declare that I have prepared this report under my own responsibility, free from any obligation, without any personal interest in the outcome and without pursuing the economic interests of third parties.

The documents provided to me were returned in full or irretrievably destroyed. If it has been agreed that documents remain with the assessor, these and a copy of the report will be archived by me in my office.

The archiving period is ten (10) years

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Hof, 27 October 2024

Friedrich Schraml
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Data protection auditor
Expert for IT security