

Data Privacy & Security White Paper

Scan2x

Date issued	-
Author	Jacques du Plooy
Document version	v 0.9
R3 Confidential. This document is for Canon Internal uses only	

1	Overview	3
1.1	Document Objective	3
1.2	Governance	3
2	Organisational Overview	4
3	Product / Service Overview	4
3.1	Product / Service Architecture	5
3.2	Description of Product / Service Architecture	5
3.3	Description of Components	6
3.4	Connectivity to other Products / Services / Systems	6
4	Organisational Measures & Security	7
5	Technical Measures & Security	9
6	Data Handling	11
6.1	Network, Data & Communication protocols used	12
6.2	Storage of Data	12
7	Data Privacy	13
7.1	How is Personal data used in Scan2x	13
7.2	Access to Personal Data	13
7.3	Deletion of Personal Data	13
7.4	Additional IT Security guidelines to protect personal data	13
8	Key Security Areas	14
8.1	Data Security	14
8.2	Network Security	14
8.3	Authentication Control	14
9	Auditing, Maintenance & Logging	15
10	Appendix 1 – Glossary of Terms & Acronyms	Error! Bookmark not defined.
11	Appendix 2 – Document changes	Error! Bookmark not defined.

1 Overview

1.1 Document Objective

This document provides Technical and Organisational Security and Privacy information in relation to the associated release of Scan2x.

This document will be periodically updated based in line with updates to the related Scan2x – these changes will be described in Summary of Changes below.

1.2 Governance

This document is subject to version control. Reference should only be made to versions contained within the Portfolio and Business Development SharePoint site.

The content remains the property of Canon Europe and is not intended for external use unless prior written approval has been given by the Document Author.

This document does not require localization.

2 Organisational Overview

The Avantech Group offers software solutions, office equipment and related products and services to the business community locally and abroad.

Avantech are official distributors and service agents for Canon Consumer and Business Solutions products. This portfolio spans the full Canon range of photo video equipment, digital photocopiers, inkjet and laser printers of all sizes, large format printers, digital projectors, document scanners and calculators. Also included are a wide range of specialised Canon software solutions designed to ease office document workflow, archive, sort, print and monitor documents.

Avantech are also local distributors for AXIS surveillance cameras and Vanguard accessories, including camera bags, tripods and binoculars.

The software department is Avantech's software solutions arm which develops software aimed at the financial services businesses in banking, wealth & fund management, insurance and FOREX. Avantech Software also developed and markets Scan2x – an innovative kiosk-style intelligent document capture solution. This unique system brings consistent and intelligent document scanning within the grasp of every user in an organization, whether big or small, while maintaining security, ease of use, consistency and audit.

3 Product Overview

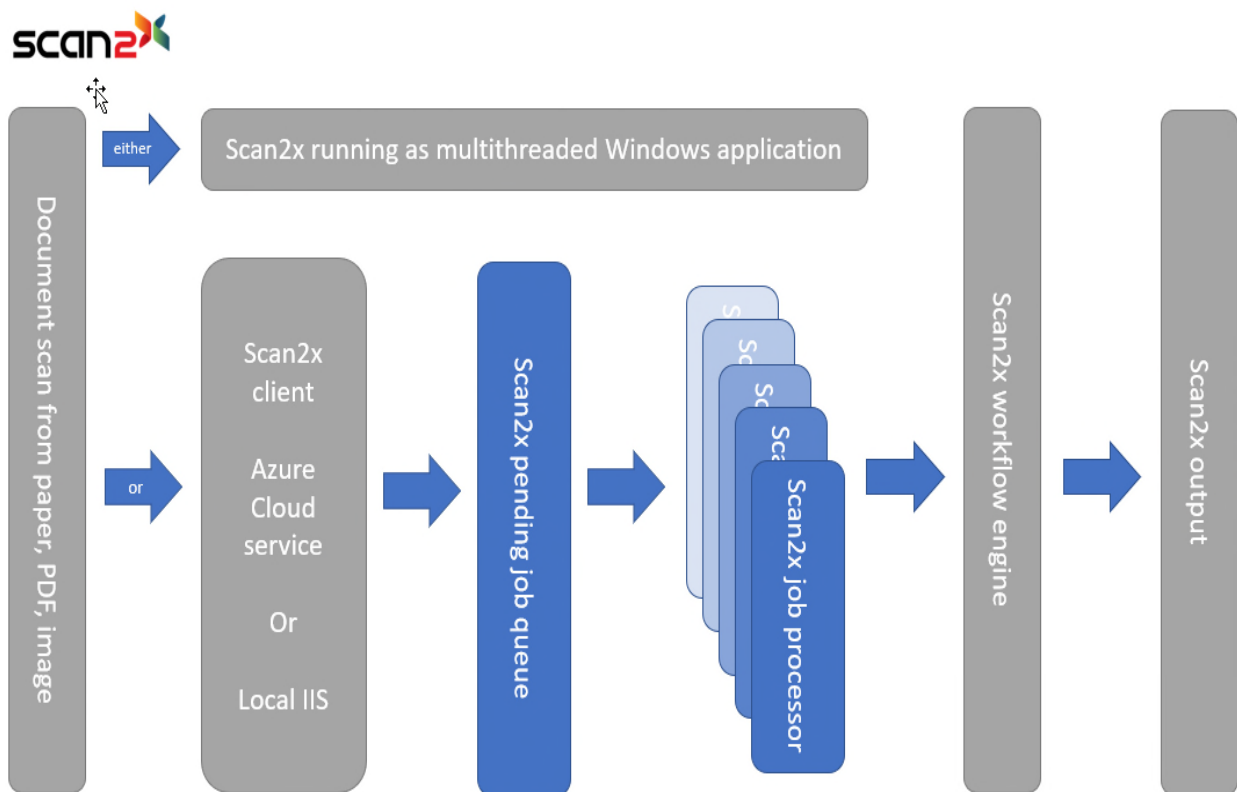
Scan2x is an Intelligent Document Capture software which boasts the unique combination of ease of use, ease of administration and ease of deployment. It can provide very simple icon-based interface for the users to scan with Scan2x or be deployed on the server while it starts the document workflows automatically based on the documents arriving in watched folders.

Both types of Scan2x deployment make it very simple to perform advanced scanning operations even with complex workflows behind them which means they can be performed by untrained operators - massively improving document workflows and speed of data processing within a business.

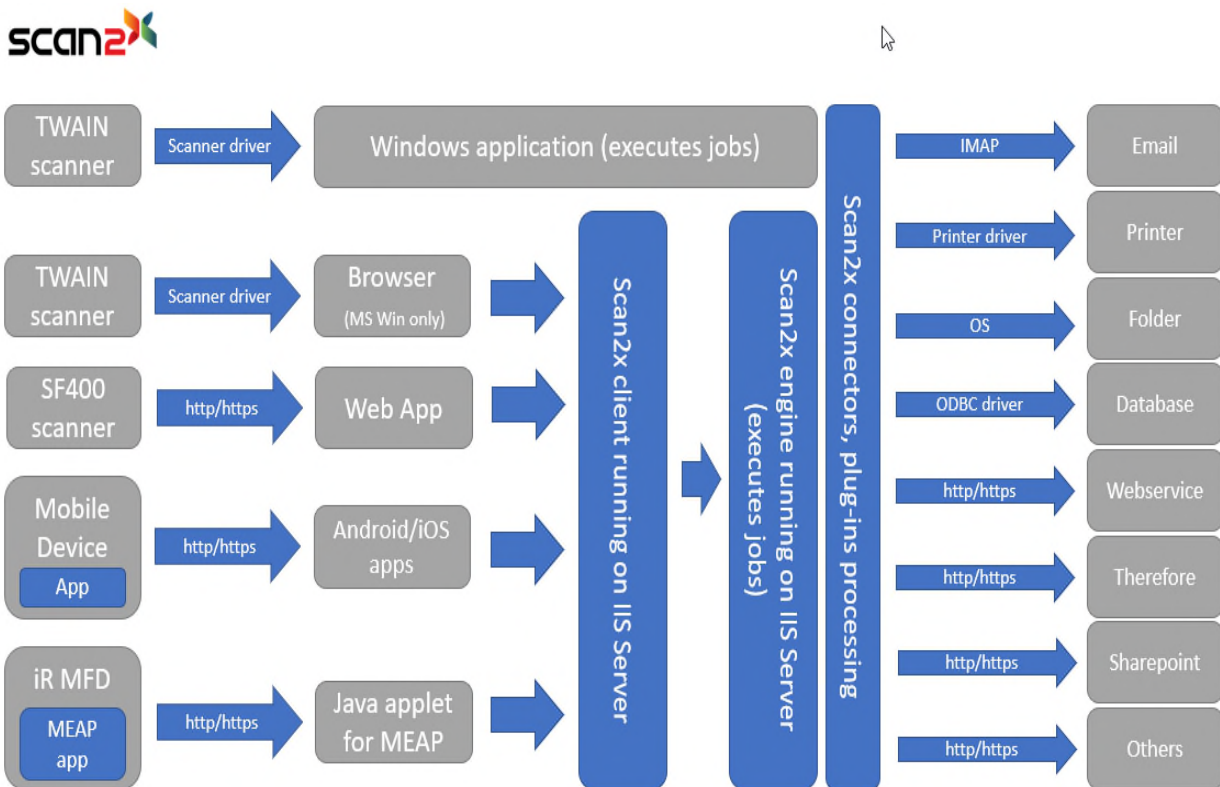
Additionally, Scan2x is designed for on-premise installation and can be implemented by a customer's IT with little to no professional services support required which opens new business opportunities to Canon.

[Scan2x Product Master Document](#)

3.1 Product / Service Architecture



3.2 Description of Product / Service Architecture



3.3 Description of Components

The Scan2x Windows application is supported on Microsoft Windows versions 10 and 11 and versions of Server 2016 and above. The software relies on a configuration database to function, and this can be hosted in MS SQL, Oracle or the Cloud. Multiple installations of Scan2x are able to access the same configuration database in order to provide synchronisation of settings across an organisation.

The IIS-based Scan2x system performs the same functions as that of the Windows version from a document processing perspective and it too relies on a configuration database. The IIS-based version also provides multiple interfaces and endpoints for communication with Scan2x on other platforms such as ScanFront 400, mobile, the MEAP multifunctional app, the MEAPWeb interface and standard browser access.

3.4 Connectivity to other Products / Services / Systems

Scan2x uses ODBC and web services to enable push and pull communication with a wide range of third party applications to suit client requirements. SOAP and REST web service protocols are both possible. There are also a growing number of dedicated interfaces and plug-ins that enable tight integration with DMS systems (Therefore, Sharepoint, FileDirector), invoice processing (IRIS) and one-button scan-and-sign functionality (Namirial, Circularo, Scrive).

4 Organisational Measures & Security

PART ONE: Organisational Measures	
Status	Measures
Measures fully implemented	<p>Policies</p> <p>Avantech has a Data Protection and Information Security policy which was compiled by external consultants in 2018 and is reviewed bi-annually upon advice from the same consulting firm.</p> <p>The policy covers the collection, handling, access and protection of personal data for employees, retail clients and any data we may be exposed to while providing support on customer production systems.</p> <p>Every onboarded Avantech employee submits a Good Conduct Certificate issued by the Police and signs an NDA with the company covering all data and intellectual property to which they are exposed during their period of employment, including third-party client data and IP. In addition, employees are briefed about their obligations and responsibilities regarding data protection and data privacy in a section of the company handbook.</p> <p>Avantech are in the process of ISO9001 certification with a target for certification by end-2022.</p>
Measures fully implemented	<p>Risk Management</p> <p>The process of identification of Information security, data protection and privacy security risks conducted annually and reviewed as new software lines or lines of business are entered into or launched. In addition, operational risks including data security are regularly reviewed as part the maintenance of our ISO9001 certification.</p>
Measures fully implemented	<p>Roles & Responsibilities</p> <p>Roles and responsibilities are defined in the Data Protection and Information Security policy. Our ISO9001 internal admin is responsible for regular reviews of any relevant policies. Incident review and remediation is handled as part of ISO9001.</p>
Measures fully implemented	<p>Confidentiality</p> <p>All Avantech group employees, agents and subcontractors sign NDAs as described above, and their duties and responsibilities are clearly explained as part of their onboarding process.</p> <p>Avantech have no relevant agents or sub-contractors.</p>
Measures fully implemented	<p>Outsourcing</p> <p>Avantech has written agreements with all third-party processors that include the detailing of obligations related to data processing and the security of any personal data. Where relevant, EU GDPR and international data transfer mechanisms are referenced to regulate privacy and security.</p>

N/A	<p>Notice and Transparency</p> <p>Avantech processes no personal data, and the only information that Avantech has of any use for is the username and email which is used during registration. Avantech also stores the IP address in the security log files, this is mapped against the username where relevant. Finally, as we provide a B2B service only, no personal data relevant to GDPR is retained.</p>
Measures fully implemented	<p>Awareness Education and Training</p> <p>Although Avantech is not processing personal data in this case, all Avantech employees receive an information security, data protection and privacy awareness course on joining and every 5 years Avantech employees get a refresher or receive an updated policy document. We sign standard NDAs with every customer we onboard.</p>
Measures fully implemented	<p>Privacy-By-Design</p> <p>Avantech follows a privacy-by-design approach to developing our applications, solutions and services. Our design of tenant-based Cloud systems ensures that we have a logical boundary between individual client databases by opening one database per tenant. Designs are peer-reviewed prior to vetting by a third-party consultant before implementation.</p>
Measures fully implemented	<p>Code(s) of Conduct</p> <p>Avantech follows a code of conduct that was reviewed and audited by Avantech's consultants, who are fully accredited in Information Security and Privacy legislation.</p>
N/A	<p>Records of Processing Activity</p> <p>Avantech does not hold or process personal information. Data that is processed as part of system provision is limited to transient OCR operations using temporary files that are logically separated by tenant and deleted periodically using automated functions. At no point is the data shared with third parties.</p>
N/A	<p>Incident Management</p> <p>Avantech does not hold or process personal information. Any incidents are managed via our service tracking system, which is monitored by our internal ISO administrator and escalated to management. Incident resolution is dependent upon underlying cause.</p>
Measures fully implemented	<p>Business Continuity</p> <p>A business continuity strategy is in place, and Avantech is also covered by a comprehensive business continuity business policy. ISO9001 processes govern annual strategy testing and review.</p>
Measures fully implemented	<p>(EU Only) Operational Base</p> <p>Avantech is based in Malta</p>

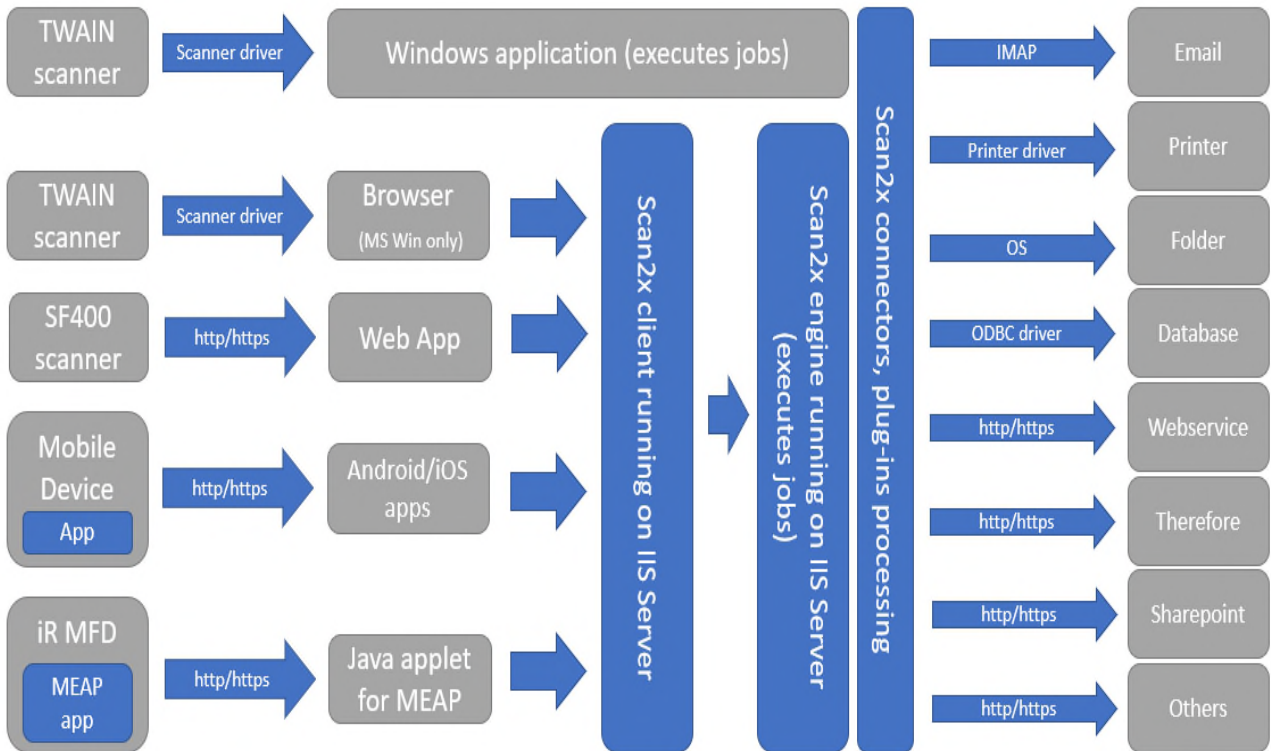
5 Technical Measures & Security

<<

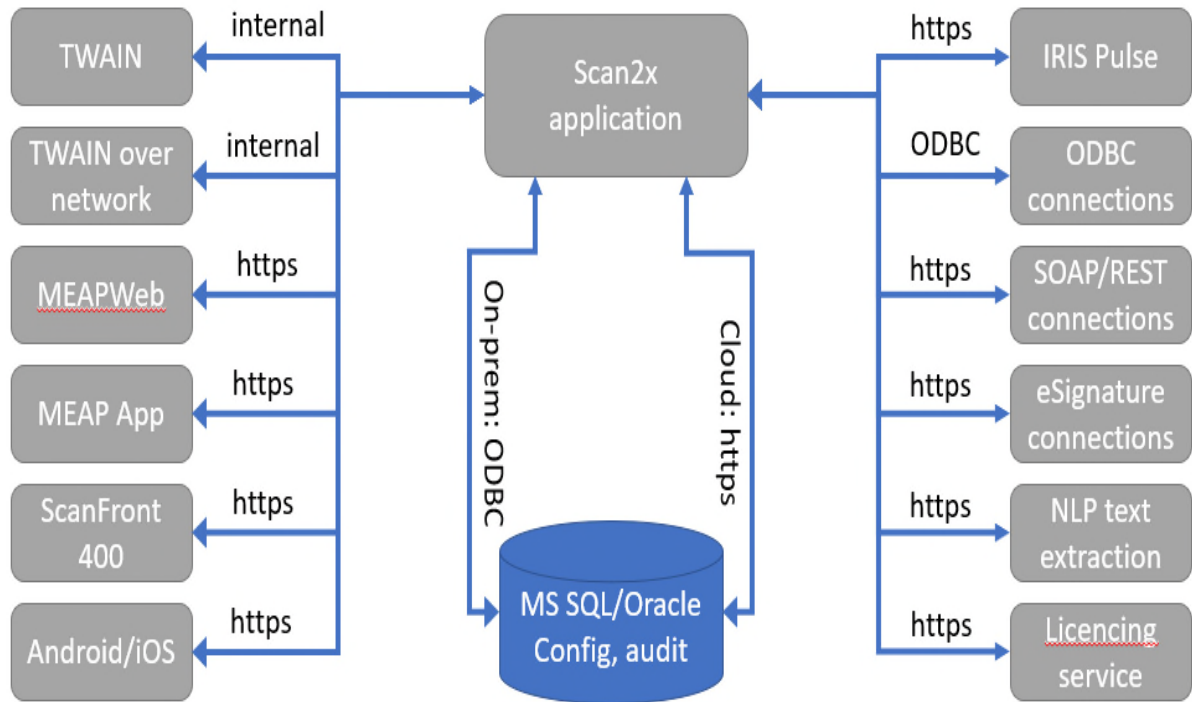
PART TWO: Product, Solution or Service Technical Measures	
Status	Measures
Measures partially implemented	<p>Certification</p> <p>ISO9001 certification process in progress, and GDPR audits have taken place with full certification.</p>
Measures not implemented	<p>De-Identification and Deletion</p> <p>Avantech does not hold or process personal information. Closed accounts are rendered invisible to staff without elevated access. Our tax laws require us to maintain records of past clients for ten years following closure and so we are prevented from deletion or anonymisation. ISO-led procedures will ensure annual review.</p>
Measures fully implemented	<p>Encryption</p> <p>Encryption is in place in transit and at rest. Processed data is only present on Cloud servers for temporary periods and secured using TLS throughout this time.</p>
Measures fully implemented	<p>Access Policy</p> <p>Access Control Policies are fully implemented on all live, development and testing environments. Devices are all secured using Microsoft Intune policy, and employees are bound with individual NDA agreements as part of standard onboarding practice.</p>
Measures fully implemented	<p>User Access Controls</p> <p>Logical Access Controls are fully implemented on all live, development and testing environments. User accounts are created only with HR approval and Active Directory policies are in place to enforce secure password policy.</p>
Measures fully implemented	<p>Segregated Environments</p> <p>All live, development and testing environments enforce logical tenant separation. The Scan2xOnline and CWC solutions are built with data segregation by tenant at their core. Tenant creation is done via automated scripting to ensure consistency in segregation policy. Each tenant is based upon a unique Azure Active Directory base and access is controlled via this component.</p>
Measures fully implemented	<p>Physical Security</p> <p>Access is controlled to all buildings and server rooms at our physical head office. CCTV is in place and monitored 24x7 by an external security company. Intruder alarms and fire alarms are also linked to the same security</p>

	company. All internal systems together with our dev, test, acceptance and production environments are Cloud-based and not hosted on site.
N/A	Removable Media No removable media is used.
N/A	Secure Disposal or Re-Use of Equipment N/A
Measures fully implemented	Activity Logs Access is logged on all systems including cloud systems and including client access on their hosted cloud solutions.
Measures fully implemented	Monitoring Avantech has automated monitoring of all cloud services.
Measures fully implemented	Availability Avantech is using Microsoft Azure and has configured failover and scaling on this platform to ensure availability.
Measures fully implemented	Evaluation of Effectiveness Avantech currently has all processes reviewed by external consultants every 5 years.

6 Data Handling



6.1 Network, Data & Communication protocols used



Only standard TCP/IP ports are required unless specifically configured differently by the user admin.

6.2 Storage of Data

Scan2x does not store data on a permanent basis unless configured to do so by the user admin. Optional audit data detailing each scan performed and including name of user, date and time, IP addresses and metadata processed is kept in the central Scan2x database. All metadata-related information is stored in the audit table in encrypted form.

All stored data is anonymised.

The Scan2x Online cloud solution is hosted in the Microsoft Azure West Europe region datacentres.

7 Data Privacy

7.1 How is Personal data used in Scan2x

Scan2x processes scans temporarily and subsequently discards all working copies of files and related data. The only optional exception to this is the user activity audit that can be configured to record metadata collected from documents, and this metadata may include encrypted personal information related only to user system access. The audit is held in a central Scan2x database and metadata records are encrypted.

7.2 Access to Personal Data

Technical staff with access to the raw database will only see encrypted values representing any document metadata audited. Only users with specific application permissions can access the decrypted audit trail via the Scan2x app, and this action is audited. There is never a situation in which users are required to access the Scan2x config and audit database.

Audit within Scan2x is configurable down to individual job level and so potential region-related data breaches can be prevented via configuration. Clients will have operational reasons why they need to have consolidated organisation-wide audit across multiple regions, however audit of metadata is disabled by default and must be specifically enabled by an admin.

7.3 Deletion of Personal Data

By default, audit data is never purged.

7.4 Additional IT Security guidelines to protect personal data

Metadata audit is disabled by default. When enabling this function for any scan job, be sure that there is a valid operational reason for doing so.

8 Key Security Areas

8.1 Data Security

Scan2x is designed with security at its core and retains no client scans whatsoever. Encryption is used by Scan2x to protect metadata collected and audited during the scan process. The encryption type used is AES256.

Scan2x data stored in the config and audit database is stored in encrypted form when required and can only be accessed through the system by an authenticated user.

The hosted version of Scan2x is monitored 24/7 by a specialist service and any non-responses from critical services trigger an immediate notification to be sent over multiple simultaneous channels (email, SMS, direct push) to the Scan2x support team. There is a status page online where live statuses can be viewed.

8.2 Network Security

No special network security measures are required to support Scan2x.

8.3 Authentication Control

Scan2x is able to authenticate users via local Active Directory for on-prem implementations, or its own Users & Groups functionality. It can also use a combination of the two. For Scan2x Online Scan2x uses Azure Active Directory via oAuth 2.0 as the basis for authentication and using the functionality contained therein it is possible to link to a client's own AD, thereby providing direct control to user admins via Single-Sign On to their own domain.

2-step authentication is possible if AD or AAD is used and configured by the client, and can be disabled by Admins if not required. All Scan2x platforms including mobile apps use the same underlying infrastructure and configuration.

The encryption technology used by Scan2x is AES256. Specific password requirements with regard to length, complexity and expiry are all configurable via the Microsoft Active Directory system.

8.3.1 User accounts

User Access levels are fully configurable.

9 Auditing, Maintenance & Logging

Logging of incidents takes place via our helpdesk and Task Manager system. Avantech tech support and development team leads have access to these logs.