gold-vision

CRM That Makes A Difference

GDPR Guide

Contents

Introduction

The following Guide describes the changes we have made to Gold-Vision to help you prepare for GDPR.

Definitions

GDPR definitions

Data Protection Impact Assessment (DPIA) helps organisations to identify the most effective way to comply with their data protection obligations and meet individuals’ expectations of privacy.

https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/accountability-and-governance/data-protection-impact-assessments/

You may need to do this if you undertake large-scale data processing or record special categories of data. If you don’t need to carry out a DDIA you will need to look at conducting a data audit.

https://ico.org.uk/for-organisations/resources-and-support/data-protection-self-assessment/

Privacy Notice – this holds information that you direct people to. It tells them about the categories of data you hold, how long you’ll keep it, the lawful basis for processing etc.

https://ico.org.uk/for-organisations/resources-and-support/getting-ready-for-the-gdpr-resources/

GV definitions

Purpose - Record why, how long you store personal data for and the lawful basis for processing personal data according to ICO Article 6

https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/

Privacy Rules - Set up automated system rules to apply the purposes you have created.

Privacy Log – this is a Gold-Vision object that holds any Privacy rules applied and also requests made by each data subject (Contact/Lead)

Privacy Notice Provided– records that a Privacy Notice has been provided. This can be triggered by a Rule applied individually or to a Campaign Stage.

Personal Data - GDPR applies to ‘personal data’ meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier.

Sensitive Data GDPR refers to sensitive personal data as “special categories of personal data” specifically this includes genetic data, and biometric data where processed to uniquely identify an individual.

https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/special-category-data/

Fields in Gold-Vision can be marked as personal or sensitive using the screen designer.

Subject Access Requests

Individuals have the right to access their personal data and supplementary information. The right of access allows individuals to be aware of and verify the lawfulness of the processing.

https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-of-access/

Erasure Requests

The broad principle underpinning this right is to enable an individual to request the deletion or removal of personal data where there is no compelling reason for its continued processing.

https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-erasure/

Expired Records

Records where the duration for the purpose for holding the data has expired. For example, you might hold prospect data for 2 years, at the end of 2 years the record will be marked as an Expired item.

Deleted Items

Deleted Gold-Vision records can be undeleted by an Administrator.

Erased Items

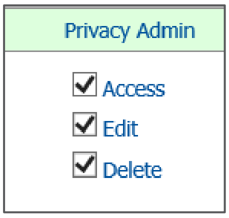
Records will be permanently removed from the data base and cannot be undeleted.

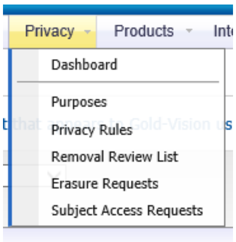
Help Resources

Access to privacy settings

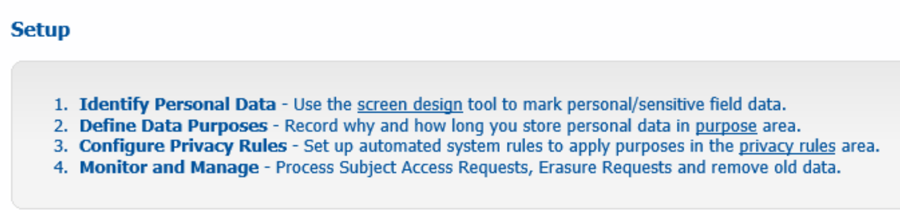
Access to privacy settings are managed in User access options.

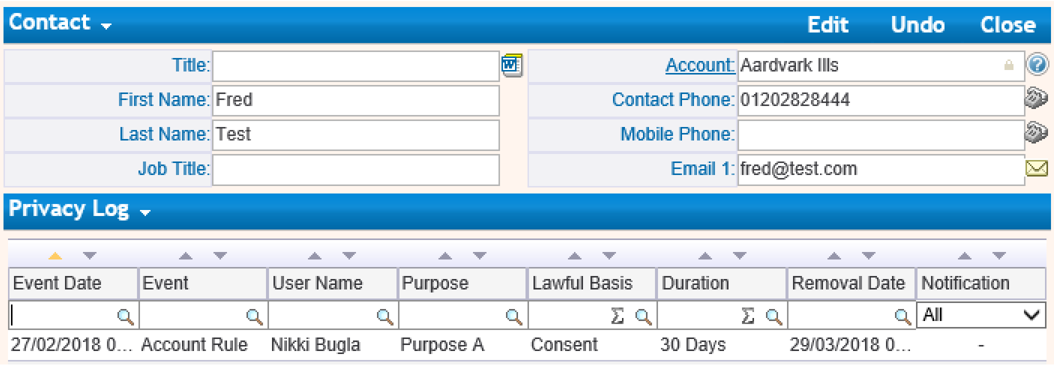
Your Data Protection Officer or person responsible for data will need access to the Privacy Admin menu in the Admin Console.



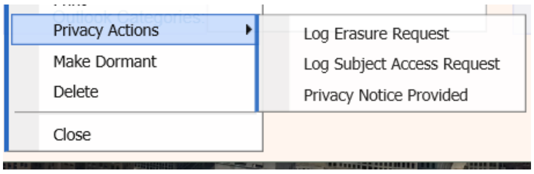


Dashboard page includes set up steps and data to review.

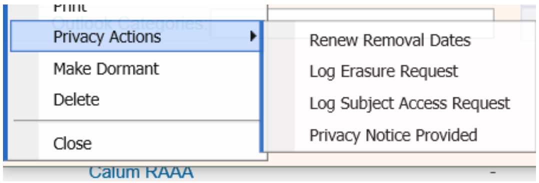


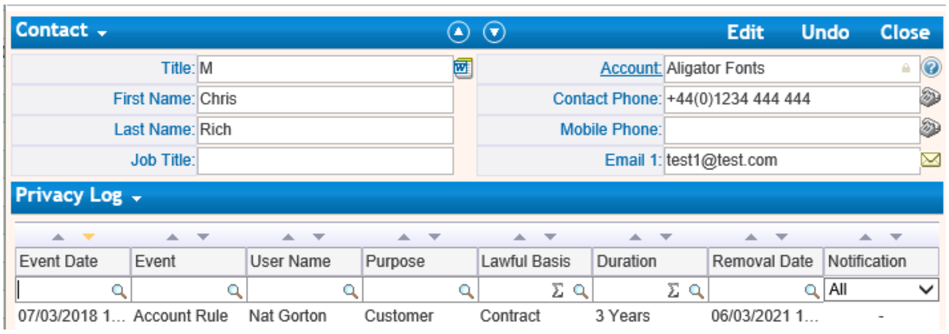


Note – all users have access to Privacy Actions: (see below for more details)



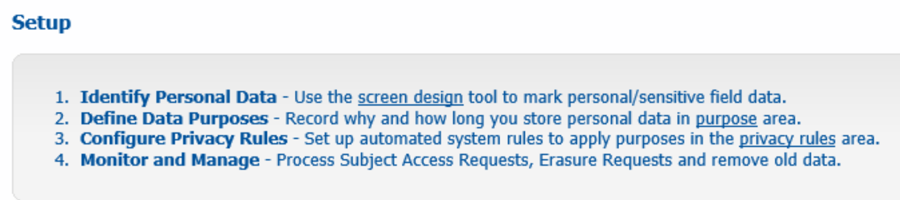
Users with access to Privacy Log will also have the Renew Removal Dates option:





Setup steps

Select Dashboard form the Privacy menu – this outlines the setup steps for you to follow:



Setup

1. **Identify Personal Data** - Use the screen design tool to mark personal/sensitive field data.
2. **Define Data Purposes** - Record why and how long you store personal data in purpose area.
3. **Configure Privacy Rules** - Set up automated system rules to apply purposes in the privacy rules area.
4. **Monitor and Manage** - Process Subject Access Requests, Erasure Requests and remove old data.

Step 1: Use the screen designer to mark Sensitive/Personal field data

Note: when records are erased, this is the data which is permanently removed from the database.

Only use sensitive for the special categories of data.

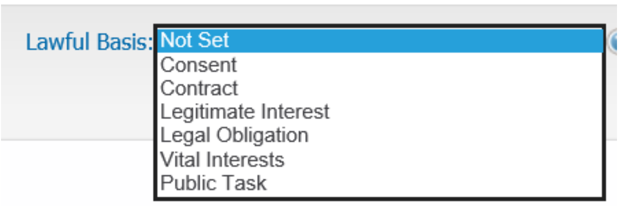
https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/special-category-data/

Step 2: Define Data Purposes

Record why and how long you store personal data (as per your Privacy Policy)

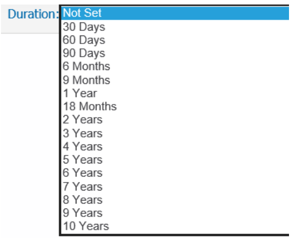
Add a description.

Set the **Lawful Basis** for processing personal data according to ICO Article 6 https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/

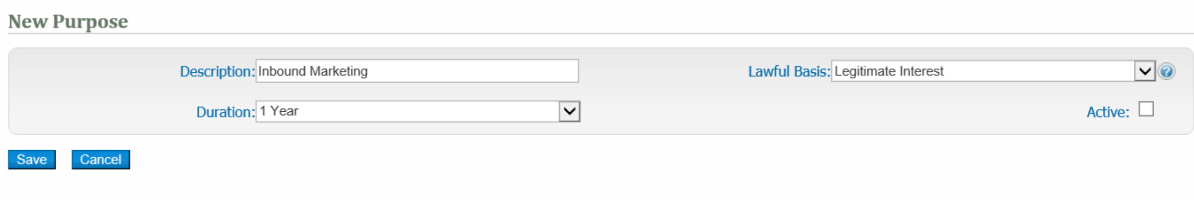


Note: these can be added to in the screen design, if for example you are processing sensitive data, see Article 9 https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/special-category-data/

Set the **Duration** from the drop down:



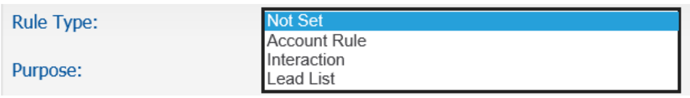
Example:



Step 3 Configure Privacy Rules

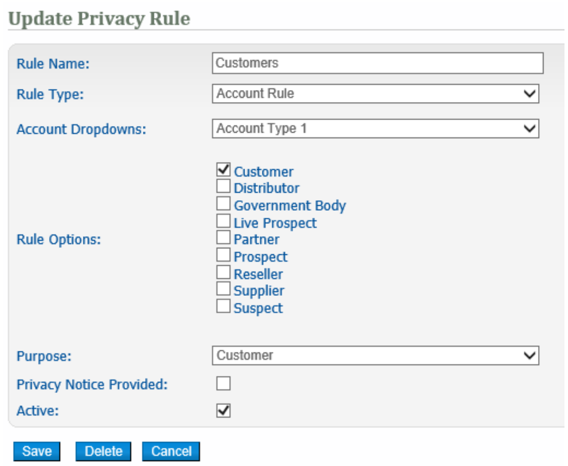
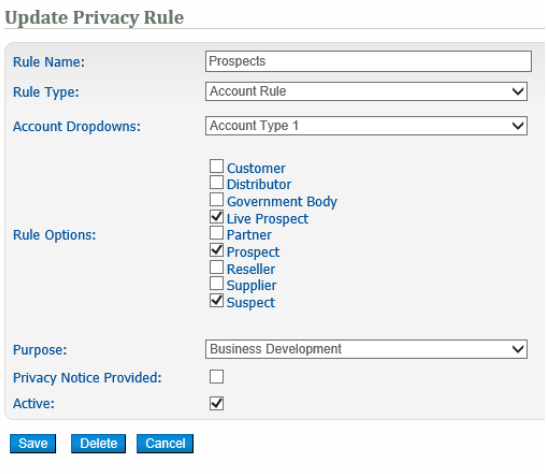
Set up automated system rules to apply purposes in the privacy rules area.

Set the Rule Type



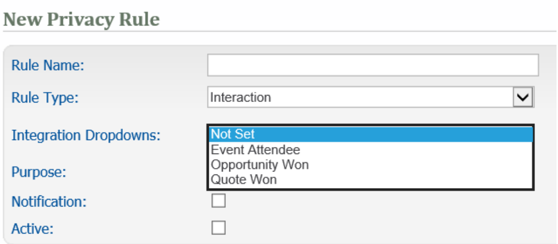
1. Account Rule

This allows you to apply a purpose to contacts based on the account type (relationship). Select the appropriate drop field for your system and choose one of more options for each rule.

Prospect/Live Prospect/Suspect	Example customer:
	Example: 

2. Interaction

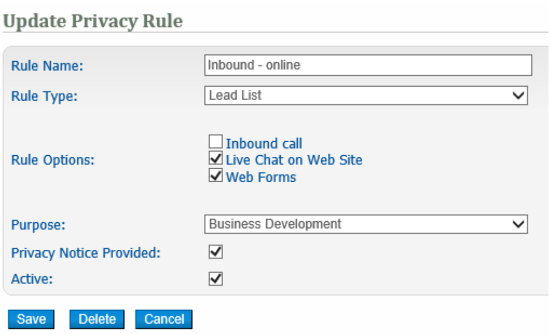
This allows you to apply a purpose to Contacts based on their behaviour – for example: when they make a purchase or attend an event. (Note: Event Attendee functionality is not available in 7.1.8, but will be in 7.1.9)



3. Lead List

This allows you to apply a purpose to a lead based on the Lead List Type. You can set up Lead List Types using the screen design tool (Listcontrol)

Select the lead list type then select the purpose to be assigned to this rule.



Privacy Notice Provided

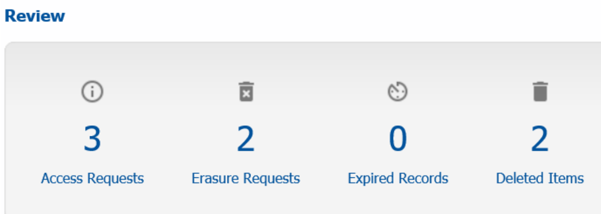
Tick this option if a Privacy Notification would have been provided – for example a link on a web sign up form.

Bulk Run Privacy Rules

Option to update all existing records – this will update all records with the relevant rules. Note all dates set will be based on the created date of the item NOT the date the bulk update is run.

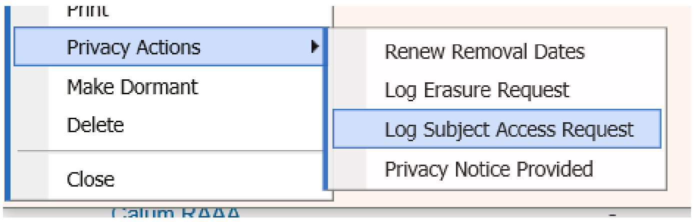
Step 4 Monitor and Manage

Process Subject Access Requests, Erasure Requests and remove old data.

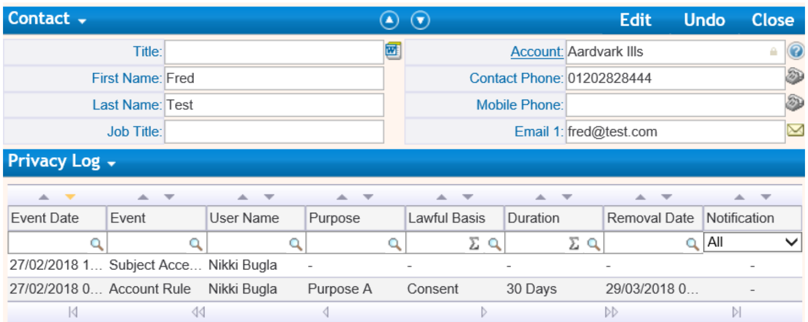


Subject Access Requests - Individuals have the right to access their personal data and supplementary information.

If a contact a requests access to their personal data this can be actioned in the contact record:



The request will be logged against the contact or lead record in their Privacy Log



The request can then be actioned by person responsible for data from the Administration Console. Under Article 12: you should process the request “without and undue delay” and within one month.

Subject Access Requests

Summary	Requested Date	Requested By	Access Request	Complete
	Select a date...			No
Fred Test	27/02/2018 10:35:05	Nikki Bugla		

Gold-Vision Message

Export Privacy Data

- Export Personal Sensitive Data
- Export Privacy Log
- Export Notes

Ok

Export Personal Sensitive Data

CSV file with contact name (summary) and all fields which have been marked as personal or sensitive. **Note**: the fields marked as Personal or Sensitive are the fields which are erased.

	A	B	C	D	E
1	Summary	First Name	Last Name	Birthday	Email 1
2	Fred Test	Fred	Test		fred@test.com
3					

If there are personal or sensitive fields stored in other Gold-Vision items, such as profiles or opportunities, they will also be listed.

Export Privacy Log

CSV file containing your lawful basis for processing, purposes and planned removal date.

Date	Event	Purpose	Lawful Basis	Planned Removal
27/02/2018 10:59	Personal Sensitive Data Exported			
27/02/2018 10:35	Subject Access Request			
27/02/2018 09:52	Account R	Purpose A	Consent	29/03/2018 09:52

Export Notes

CSV file of notes relating to the contact or lead.

Erasure Requests

Erasure Requests: All | Erase All

Summary	Requested Date	Requested By	Erase	Request Completed
	Select a date...			No
Joe Bloggs	13/03/2018 15:56:57	Nikki Bugla	✕	-
Bob Geldof	13/03/2018 15:55:01	Nikki Bugla	✕	-

Records 1 to 2 of 2

Contacts will be permanently removed from Gold-Vision and the database

Expired Records

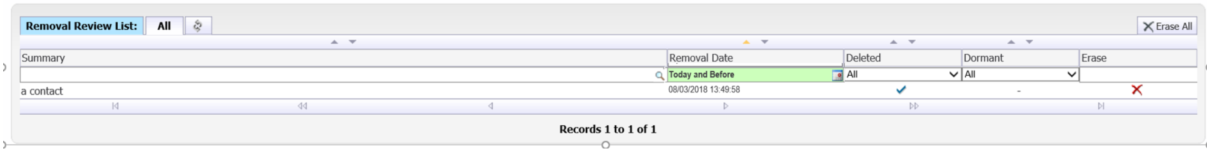
Removal Dates are there to show when a contact or lead has gone passed the original retention period that was applied based on the Privacy Rules. This does not mean that the data is removed automatically - or that you should not keep the contact or lead in Gold-Vision. It does give you the opportunity to review the data, check the lead or contact are still interested in your products or services or indeed, still an active customer.

Ideally, you would review your data before the removal date was reached so that your Privacy Administrator can keep your data no longer than is necessary. (article 5.5)

Removal review list.

Shows contacts and leads whose removal date has passed as well as deleted or dormant contacts.

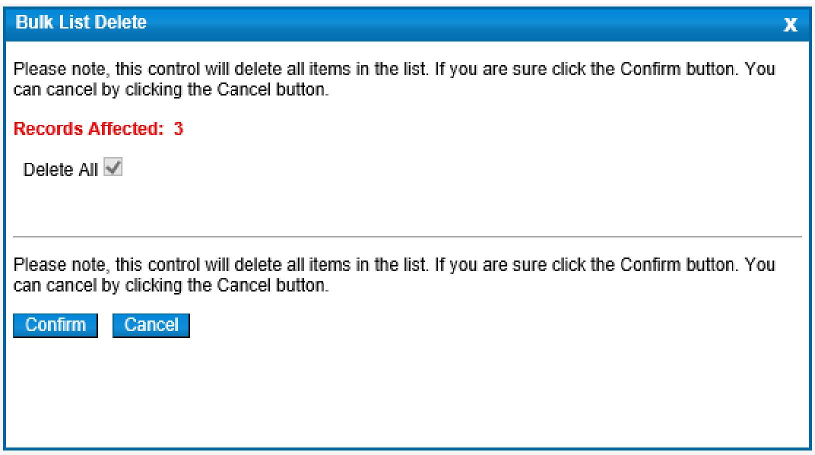
Filter this list as required to bulk erase.



Deleted Items

The Removal review list shows all records marked as deleted or dormant as well as contacts whose removal date has passed. Filter the list to show only deleted contacts or leads. Records can be erased individually or in bulk.

Note: there is a now a Bulk Delete option in all lists in Gold-Vision (available under the same access options as Bulk Replace)

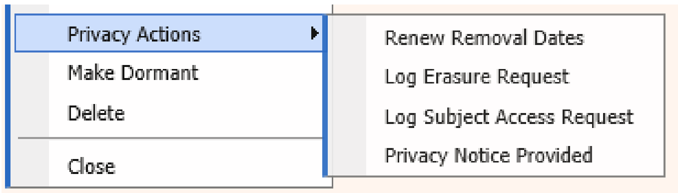


Any contacts deleted will appear in the removal review list and can be erased from the system.

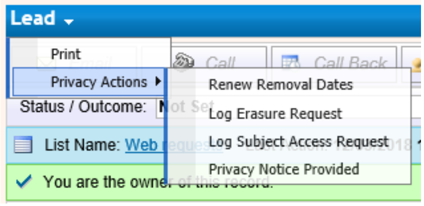
Privacy Actions

All Gold-Vision users will have access to Privacy Actions.

Contacts



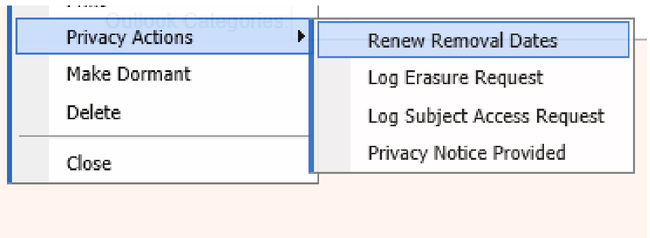
Leads



Note: If you do not have access to the Privacy Log (in user Access Options) you will not have access to the Renewal Removal Dates option.

Renew Removal Dates

Within the Privacy Actions, you can extend the retention of your leads and contacts as this reapplies the Account Rules(s) or Lead List rule.



Note access to the Privacy Log is available in user access options.

Privacy Log

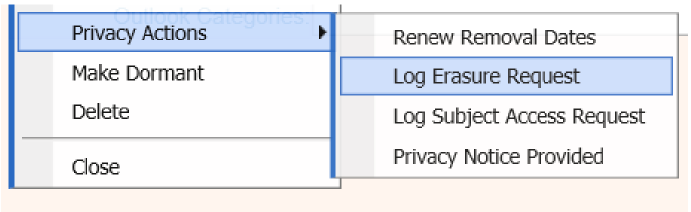
Event Date	Event	User Name	Purpose	Lawful Basis	Duration	Removal Date	Notification
12/03/2018 11:12:49	Account Rule	Nikki Bugla	Customer	Contract	3 Years	11/03/2021 11:12:49	-
12/03/2015 11:12:09	Account Rule	Nikki Bugla	Customer	Contract	3 Years	11/04/2018 11:12:09	-

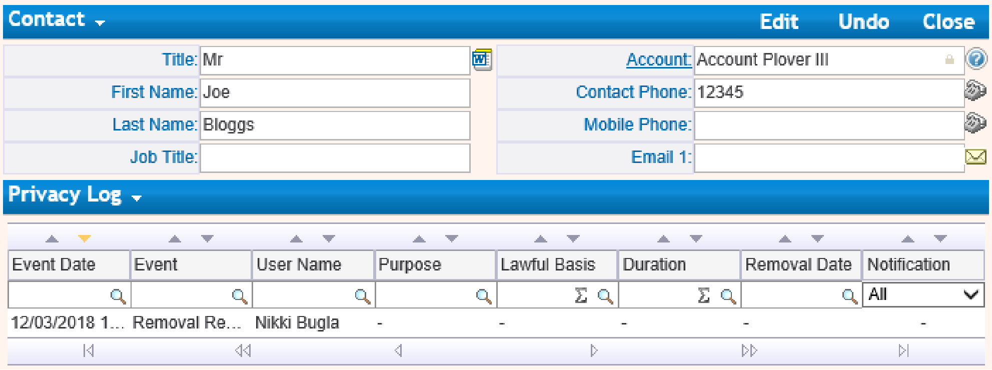
Log Erasure Request

The right to erasure is also known as 'the right to be forgotten'. The broad principle underpinning this right is to enable an individual to request the deletion or removal of personal data where there is no compelling reason for its continued processing.

https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-erasure/

If a contact or lead requests that their data be removed from your Gold-Vision, this can be done by logging an Erasure Request:





The request will be logged against the contact or lead record in their Privacy Log. Note access to this is available in user access options.

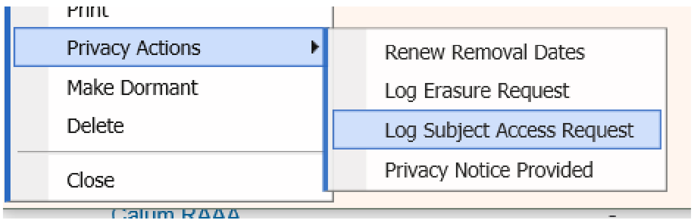
This can then be actioned by your data administrator (see above). The data will be permanently deleted.

Note: if a contact is deleted, is can be undeleted in the Admin Console. Erased data cannot be brought back in to Gold-Vision.

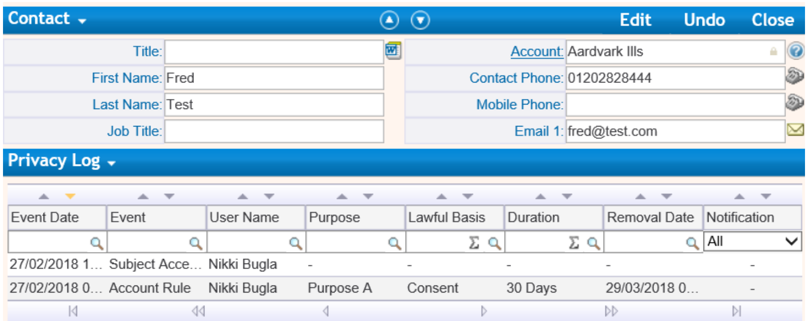
Log Subject Access Request

Individuals have the right to access their personal data and supplementary information.

If a contact or lead requests access to their personal data this can be action in the contact record:



The request will be logged against the contact or lead record in their Privacy Log. Note access to this is available in user access options.



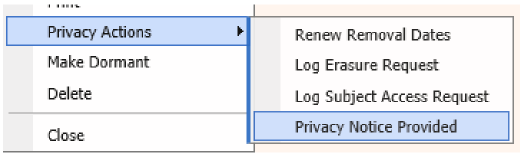
The request can then be actioned by person responsible for data from the Administration Console. Under Article 12: you should process the request "without and undue delay" and within one month.

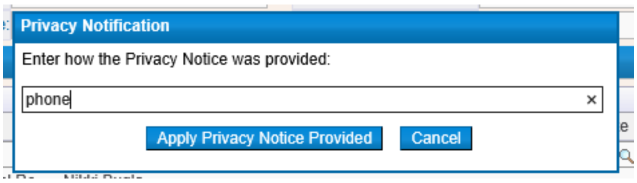
https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-of-access/

Your data administrator will be able to send the data you hold about them (see above)

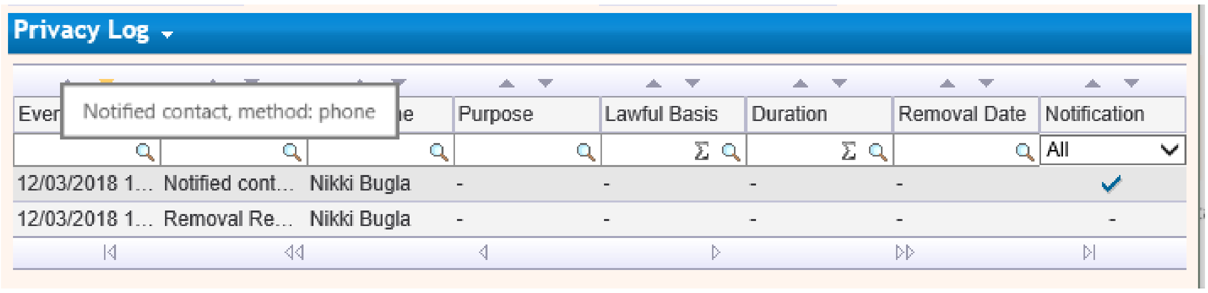
Privacy Notice Provided

A user might have advised the contact or lead about your privacy policy whilst on the phone, this can be recorded in Gold-Vision, against the Contact or the Lead.





This action will be displayed in the Privacy Log

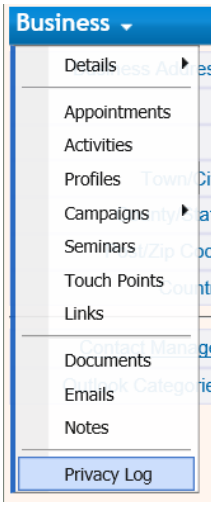


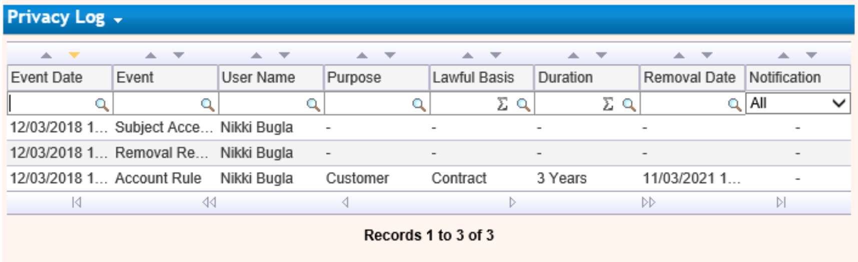
Privacy Log

The Privacy log documents rules which have been applied to the contact or lead, erasure requests, subject access requests and privacy notices that have been provided.

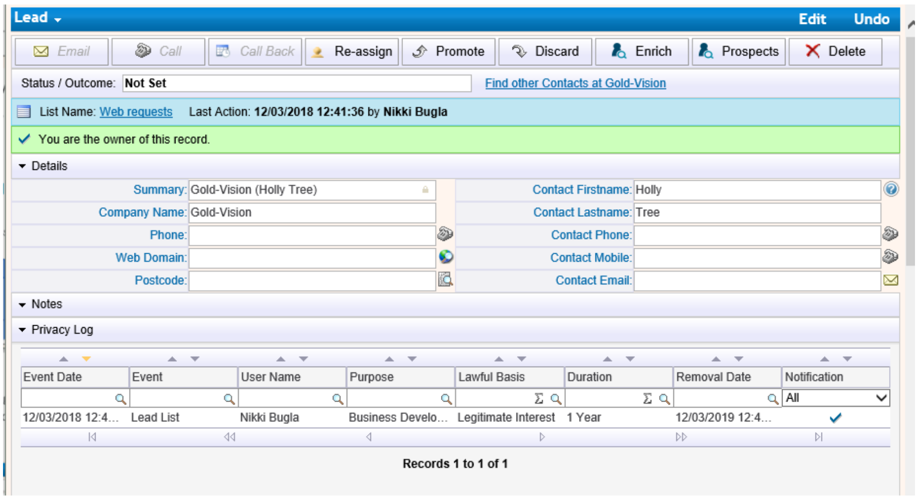
Note access to the Privacy Log is available in user access options.

Contact





Lead



Best Practice

Privacy Notices

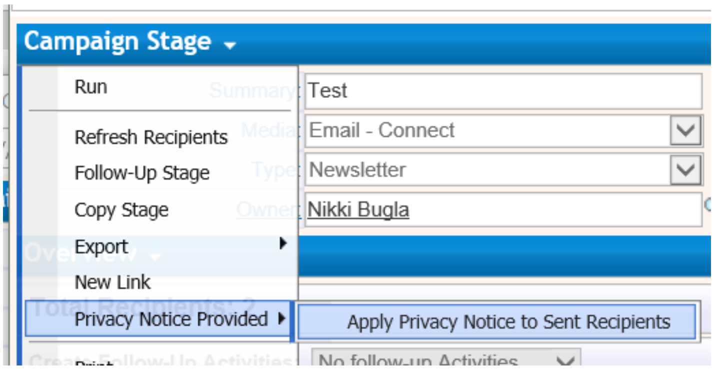
Q. Do I have to provide a Privacy Notice (Right to be informed) to my existing Contacts and Leads?

A. You can ask for clarifications from the ICO. Current opinion is that you do, and it is good practice.

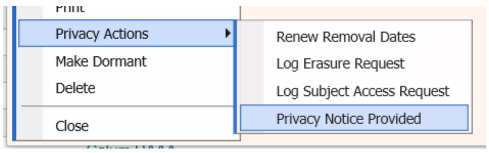
Q. How do I show I've sent a Privacy Notice?

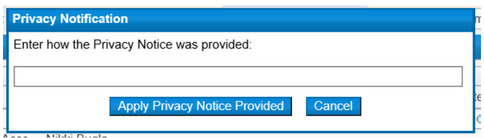
A. Gold-Vision documents this for you in the Privacy Log.

- You can use Campaigns and once the stage has been run go to Campaign Stage → Privacy Notice Provided → Apply Privacy Notes Sent to Recipients



- New leads from inbound marketing may have been provided with a Privacy Notice so use a Lead list rule for this.
- If you individually provide a Privacy Notice, you can record this from the Privacy Action menu on a Contact or Lead





Q. Can I automatically email a Privacy Notice using Alerts?

A. If you are using your own SMTP Settings [Tools-> Administration, Settings-> SMTP Settings], you can set up an alert on Contacts and Lead Lists to send an email on creation.

If you are a Hosted customer and have not entered your own SMTP Settings, the email would come from 'Gold-Vision' and therefore is not suitable for this (as its purpose is to inform the data subject that you are the Data Controller).

The best solution is to use Marketing Automation for this regular task. This will be available in a later release.