cc|crm gdpr process and data package

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1   Preliminary remarks

The General Data Protection Regulation (GDPR) stipulates in its "Principles relating to processing of personal data" (Art. 5 GDPR) and the resulting further legal articles some information which must be considered in CRM systems in order to comply with the requirements correctly.

This requires a modification of the CRM system or other technical and organizational measures leading to the same results.

The following describes the additional data fields and processes included in the GDPR module for this purpose. References to legal articles always relate to the respective article of the General Data Protection Regulation unless marked differently. (Original text see: http://bit.ly/dsgvo-gesetz)

All information is located in the "Contact" and "Lead" entities as this is where data of actual people is processed in general. For this purpose, the "General Data Protection Regulation" section was added to the processing form:
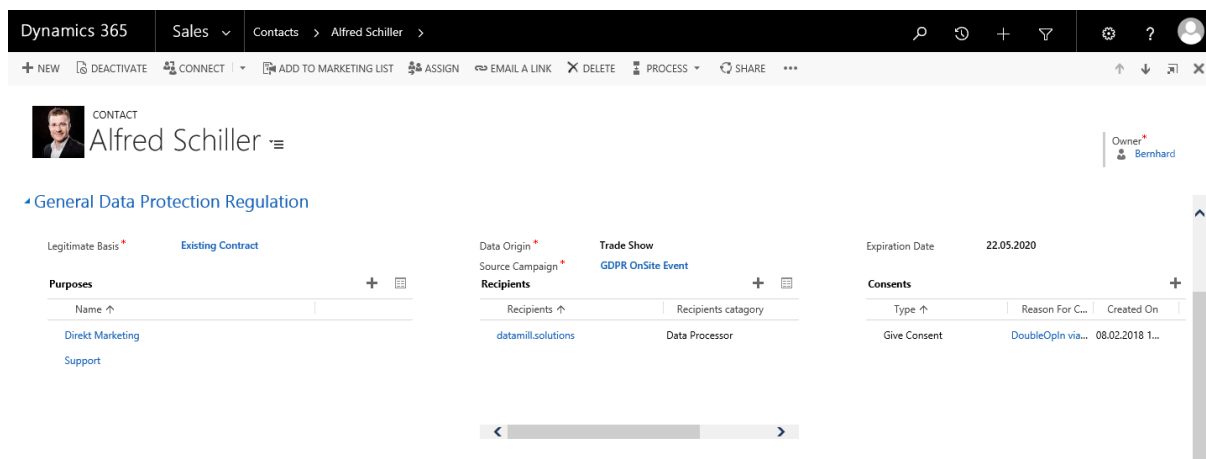
2   Structure and GDPR basis of the individual sections

2.1   Legitimate Basis

The "Legitimate Basis" field allows the selection of the possible permission options according to Art. 6:

In the case of new data records, the legitimate basis "Pre-contractual measures" and the purpose "Customer support" are entered automatically. This is a sensible default for new records. If a different default should be entered, this requires a short intervention by the support centre.

With the exception of the legitimate basis "Pre-contractual measures", the other legitimate bases can be renamed and expanded in the "Settings". There, you can also define the month specifications for the individual legitimate bases. This should be done in coordination with the data protection officer of your own company.

2.2   Expiry Date

The respective number below the entries specifies the currently defined storage period in months set for this legitimate basis. After the expiry of this period, the record is up for deletion.

The storage period is important because it must also be specified for the respective processing for information to be provided according to Art. 13 + 14, fulfilment of the right of access according to Art. 15 as well as records of processing activities according to Art. 30.

The storage limitation is also specified in Art. 5 Para. 1 e as one of the principles of processing personal data. Once a data record is no longer needed, it must be deleted or anonymized by removing the data which provide personal references.

The number of months for the respective legitimate basis results in an estimated expiry date for the respective record. If, for example, the record is created on 24.02.2018 and the legitimate basis specifies a retention of 3 months, this results in an expiry date on 24.05.2018.

However, the "Expiration Date" does not remain constant but changes automatically if:

▶ a different legitimate basis with other retention periods is selected OR

▶ an incoming activity is recorded (e.g., an incoming call) OR

▶ an appointment involving the concerned person is created.

The retention period is reset in these cases.

ATTENTION: When a data record has reached its expiry date, it will be automatically deleted by the system the following night or manually. This also applies to any associated object and/or the personal reference is removed from these other objects. For example, an appointment with the other participating individuals remains.

In order to comply with the notification obligation according to Art. 19, you can create a query returning the records expiring soon. These can also be represented clearly on the personal dashboard. Any recipients of the data could then be notified of the imminent deletion.

2.3   Data Origin

As a result of the accountability (Art. 5 Para. 2), but also in the context of replying to an information request (Art. 15), the origin of a data record must be specified. Therefore, in a newly created data record, the Origin and the underlying Source Campaign must be selected from a list.

A change in the selection list for the Data Origin requires a short intervention by the support centre.

2.4   Purposes

A similar situation prevails for the specification of the purposes as for the storage period. They must be specified for information to be provided (Art. 13), information request (Art. 15) as well as records of processing activities (Art. 30). In order to avoid confusion, the terms of the individual purposes

should be selected consistently. For example, using the term "Customer Service" for information to be provided and then "Customer and Prospect Service" for information request is not productive.

Each contact can have multiple purposes.
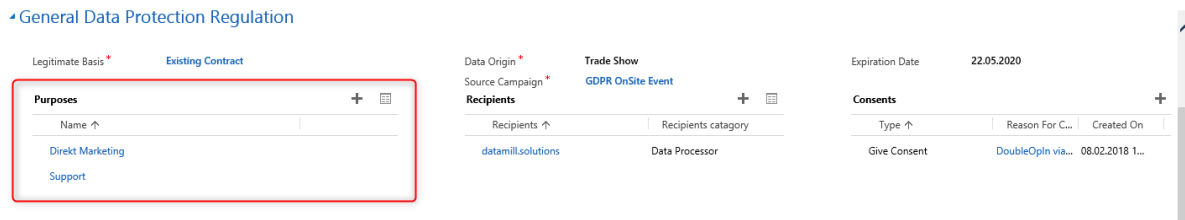
ATTENTION: If a data record no longer has a purpose (for example, because the data subject has objected to the purpose), there will be no need for further storage of data. The Expiration Date is automatically set to the current date and the record will be deleted from the system the following night.

You can amend the list of purposes at will and adjust it yourself in the "Settings" section. This should be done in coordination with the data protection officer of your own company. However, please note that in the sense of the GDPR principle of "purpose limitation" (Art. 5 Para. 1 b), the data subjects may need to be informed about newly added purposes (Art. 13 Para. 3) so that they may contradict the new use. This concerns in particular direct marketing purposes (Art. 21).

2.5   Recipients

In the context of information to be provided (Art. 13), the GDPR only requests the specification of categories of recipients. For a detailed reply to an information request (Art. 15) as well as for compliance with the notification obligation according to Art. 19, we, however, recommend logging the actual recipients.
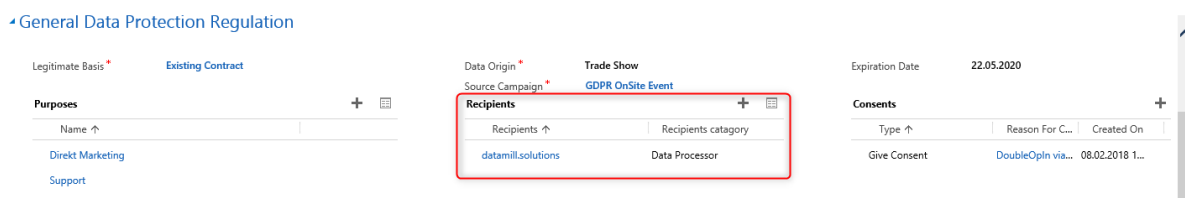
Recipients must be differentiated from processors (Art. 28). While processors process data only in the context of an assignment defined by a controller, recipients have an individual interest in processing the data. An example of a recipient would be a company with which you jointly organised a competition, which shall receive the data records of the contest participants for their own

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purposes. Of course, this transmission must already be included in the information to be provided according to Art. 13.

Any company data record can be selected as recipient. You can specify any number of recipients.

2.6   Consents

According to Art. 6, consent can be a legitimate basis for the processing of personal data. Even if other legitimate bases exist, consent may still be required for some of activities (e.g., sending newsletters to consumers). Art. 7 specifies the conditions for obtaining valid consent. For the purposes of accountability, you must be able to furnish proof of the consent. In addition to a double opt-in process, we therefore also recommend a corresponding note in the database.

Hence, any number of consents and also their withdraws can be managed per contact data record. The "Reason For Consent" can be selected freely, for example "Newsletter".

Make sure to adapt the search criteria appropriately and check for existence of the respective declaration when defining segments for marketing lists that only go to contacts that have given a certain consent.

According to Art. 7, consent may be revoked at any time with effect for the future. In this case, the consent entry must be removed from the list. For better traceability, you should add a note to the relevant record regarding the revoked consent.

2.7   Replying to information requests

Replying to information requests according to Art. 15 GDPR is one of the most important elements in the implementation of the new General Data Protection Regulation. Since the provision of information must be free of charge and within a relatively short period of time (1 month max.) and must also include a copy of all personal data, it is important that you are able to extract the required information quickly and efficiently from the systems.

This is implemented in the form of a report, producing the following associated entities by default:

- Address
- Activities (e-mails, appointments, etc.)
- Service requests
- Quotation
- Claim
- Order
- Feedback
- Company
- Recipients
- Contact
- Lead
- Notes
- Invoice
- Connection
- Consent
- Sales opportunities
- Contract

The "Right of Access" report can be adjusted through intervention of the support centre.

This report can be called up directly at the contact:

LÖSCHEN FORMULAR VERARBEITEN ▾ •••

- Freigeben
- Folgen
- Workflow ausführen
- Dialog starten
- Word-Vorlagen ▸
- Bericht ausführen ▸ | Für den aktuellen Datensatz ausführen
- Andere Aktivitäten ▸ | DSGVO_Recht_Auf_Auskunft

Dynamics 365   Sales ▾   Contacts > Alfred Schiller ▾

+ NEW   DEACTIVATE   CON

CONTACT
Alfred Sc

Report Viewer: DSGVO_Recht_Auf_Auskunft - Internet Explorer

File   Help ▾

Edit Filter

Language German ▾   View Report

|◀ ◀ 1 of 18 ▶ ▶| ⟳   100% ▾   [   ] Find | Next   💾 ▾ ⟳ 🖨

Kontakt

Kontaktinformationen		Persönlich		Marketing	
Name	Alfred Schiller	Geschlecht	Male	Ursprungslead	
Position	Senior Sales Manager	Familienstand		Letztes Kampagnendatum	
Firmenname	FWI	Name des Ehepartners		Marketingmaterialien	Send
E-Mail	alfred.schiller@fwi-group.co	Geburtstag		**Fakturierung**	
Telefon (geschäftlich)	+43 664 88492098	Jahrestag		Währung	Euro
Mobiltelefon	+43 660 856085075	**Persönliche Notizen**		Kreditlimit	
Fax		S460		Kreditsperre	No
Bevorzugte Kontaktmethode	Email			Zahlungsbedingungen	
Straße 1	Im Stadtgut Zone A			**Kontaktvoreinstellungen**	
Straße 2				Kontaktmethode	Email
Straße 3				E-Mail	Allow
Ort	Steyr			E-Mail folgen	Allow
Bundesland/Kanton	Oberösterreich	**Datenschutz-Grundverordnung**		Massen E-Mail	Do Not Allow
Postleitzahl	4407	Rechtsgrund	Existing Contract	Telefonnummer	Allow
Land/Region	Österreich	Datensatzursprung	Trade Show	Fax	Do Not Allow
Versand		Quellkampagne	GDPR OnSite Event	Post	Allow
Versandmethode	Default Value	Ablaufdatum	22.05.2020	**Sonstiges**	
Lieferbedingungen				Besitzer	Bernhard Rastorfer
Datenvalidierung				Erstellt am	05.10.2017 09:55
E-Mail gültig	No			Erstellt von	Bernhard Rastorfer
Telefonnummer gültig	Yes				
Mobilnummer gültig	Yes				
Status Mobilnummer	valid				
Phonetic Code	A416 S460				

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Legitimate Basis *   Exis

Purposes

Name ↑

Direkt Marketing
Support

Data Validation

Email Valid	🔒 No
Phonenumber Valid	🔒 Yes
Mobilenumber Valid	🔒 Yes
Status Mobilenumber	🔒 valid
Phonetic Code	🔒 A416 S

Active