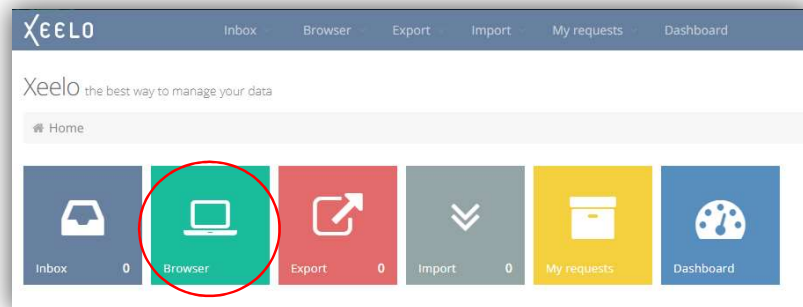*After the log in into Xeelo environment, please continue to Browser section*

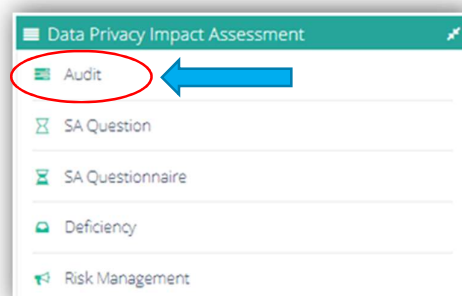## Situation 1 – Managing the GDPR Audits

To be in line with Article 32 (d) of the GDPR, you decided to perform internal assessment evaluating the effectiveness of technical and organizational measures. As a first thing, you establish new audit in Xeelo.
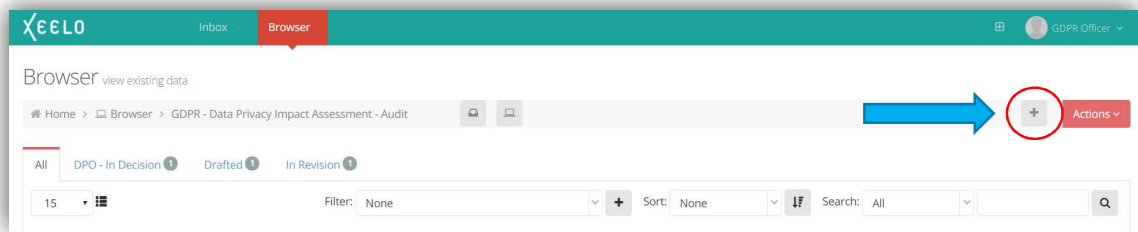
Article 32 Security of processing

...the controller and the processor shall implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk, including inter alia as appropriate:

(d) process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing.
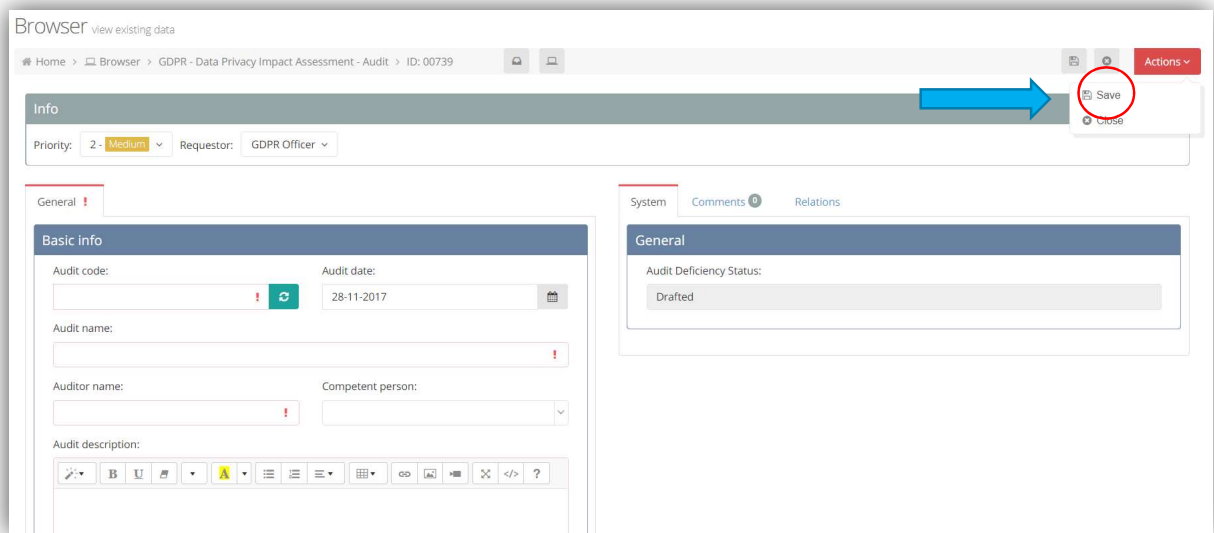
1.1   Go to the Audit Section
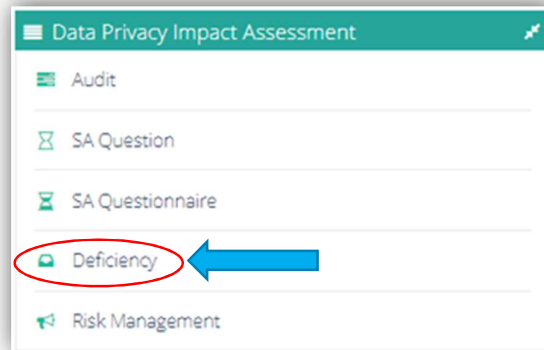
1.2   Create New Audit Record

1.3   Fill in the Basic Audit Info and click on Save & Submit button
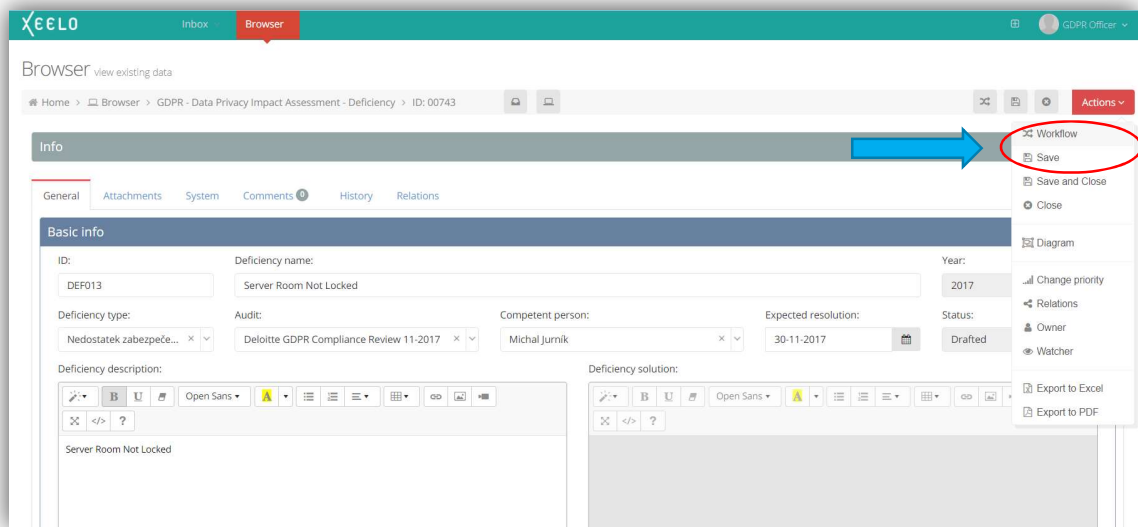

Now you have established the basis for recording the audit results.

During the audit, you continuously identify various deficiencies that needs to be documented and handled. Each time you identify one, record it in Xeelo.

1.4 Go to Deficiency section
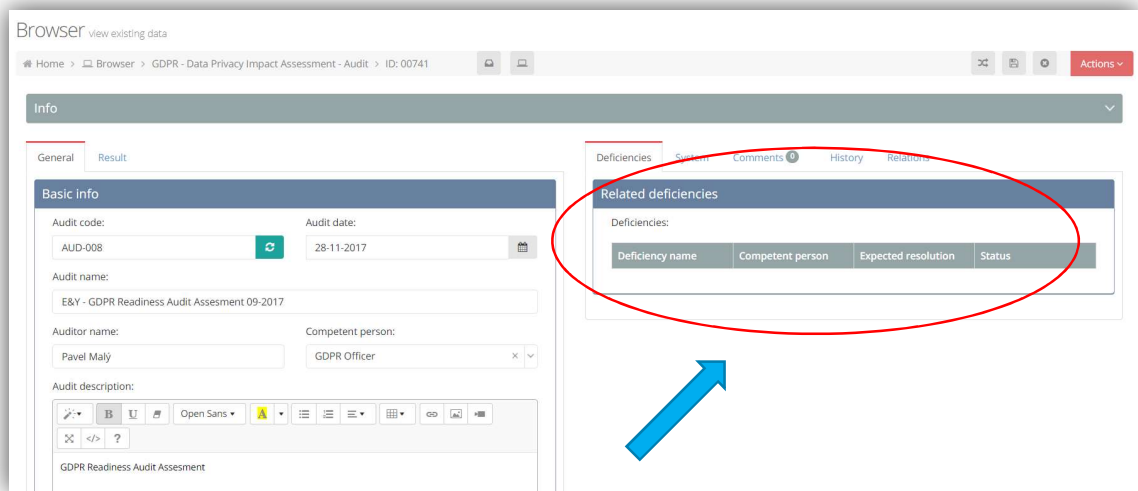

1.5 Record Deficiency

Fill in all the details and click on Save button, then on Workflow button.

Please note that during this process, you do 2 key things:

- Assign the deficiency to specific person for solution. This person will be notified via e-mail and you can always check the solution status of each deficiency in Xeelo (Open / Closed)

- You link the deficiency with particular audit. Next time you open the Audit created in previous step, you will also see all related deficiencies in a nice summary on main page
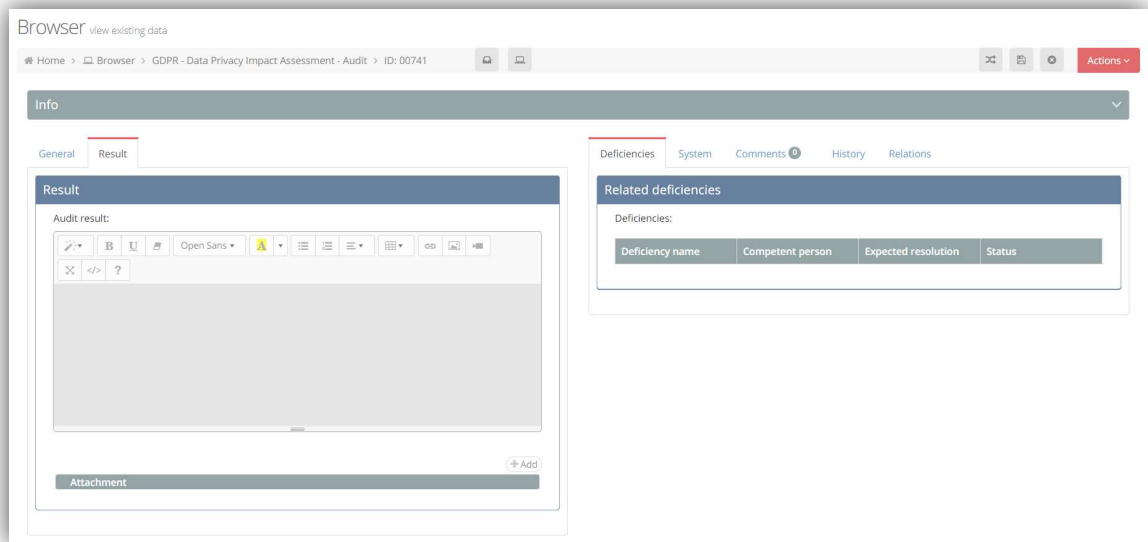
1.6   Finalisation of Audit

Once the audit is done, go to the Audit section again, select audit you created and click on the update section.
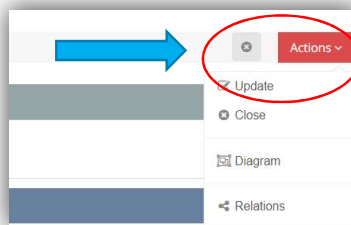
On the Tab Results you can now briefly Summarize the Audit results, add the report as an attachment etc.

Once done, save it and via Actions button sent it to Final workflow step. Now the Audit will be closed, no further modification will be possible.

Audit section can be accessed by various people in you organization (Top Management, Board etc.) and presented as an structured evidence to the Regulator.
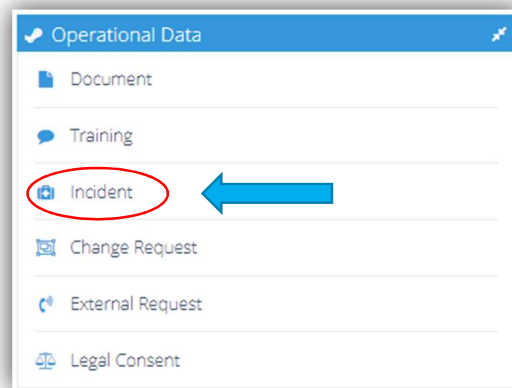
Situation 2 – Incident Reporting

Employee lost the laptop containing personal information. Because he / she is aware of GDPR policies are in place, wants to report the incident properly in order the Data Privacy Officer woud be immediately informed and could decided on further steps.
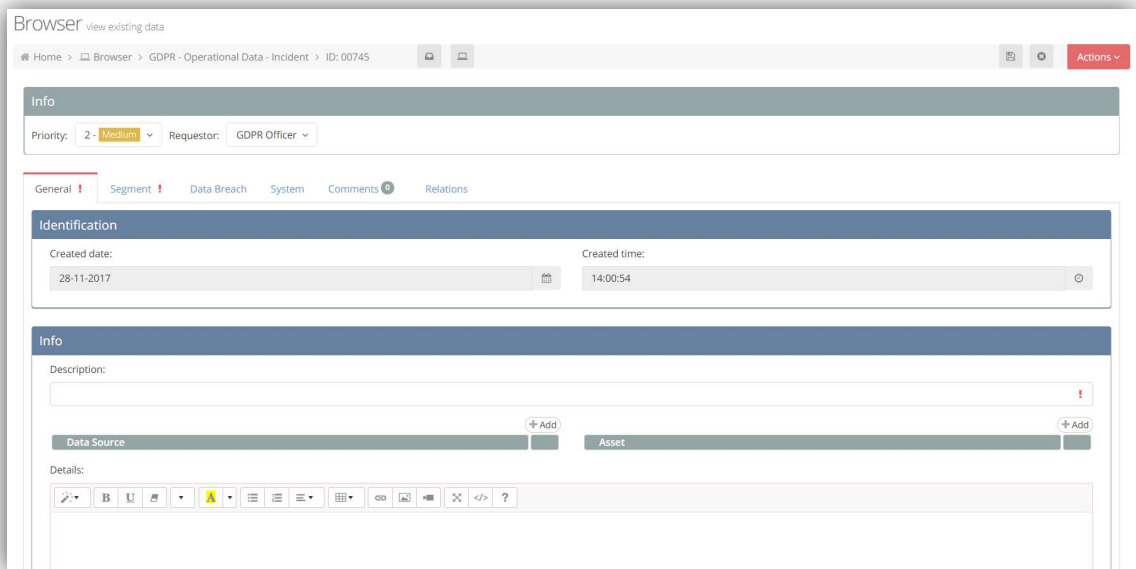
Article 33 - Notification of a personal data breach to the supervisory authority
In the case of a personal data breach, the controller shall without undue delay and, where feasible, not later than 72 hours after having become aware of it, notify the personal data breach to the supervisory authority competent in accordance with Article 55, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons.

2.1 Go to Incident Section
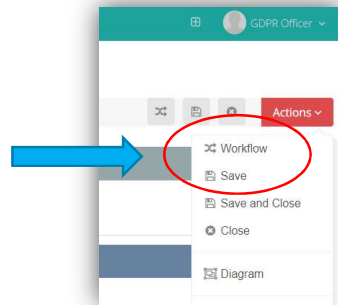

2.2 Fill in the incident Details
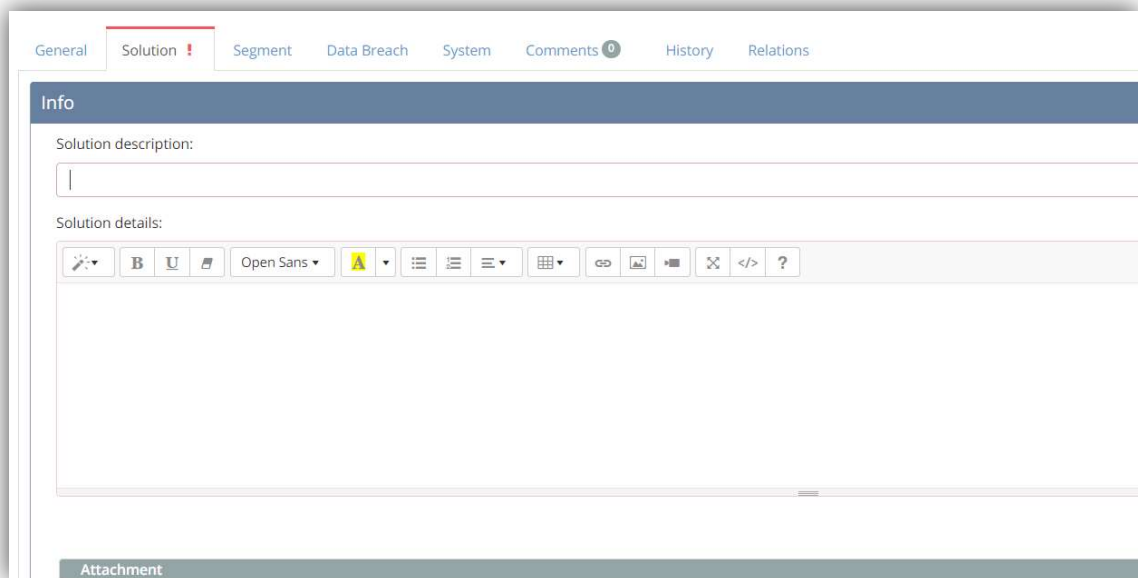
You briefly describe what happened, what asset or data sources were compromised or you can add the attachment. On the tab Segment you also Select your Department and segment the data concerned.

Under the button Actions you click Save and subsequently Workflow.

Your report is now sent to designated person for assesment.

2.3   Designated Person receives the incident for assessment

Attaches the comments and resolution and decides whether its a mere Incident and can be closed from GDPR point of view or true Data Breach and executives, authorities or data subjects should be notified.

Situation 3 – Training of Employees

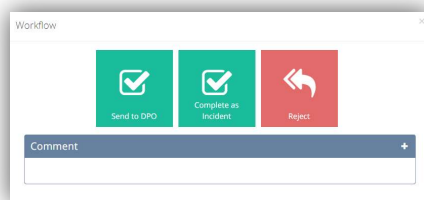You as a Data Privacy Officer decide to arrange employee training on new GDPR legislation updates, in line with Articles 39 or / and 47, knowing that it is important not only perform the training, but also to be able to demonstrate how it was held, who attended etc. Here again, Xeelo easily helps.

Article 39 Tasks of the data protection officer
*The data protection officer shall have at least the following tasks:*
(b) … awareness-raising and training of staff involved in processing operations, and the related audits;

Article 47 Binding corporate rules
1.The competent supervisory authority shall approve binding corporate rules in accordance with the consistency mechanism set out in Article 63, provided that they:
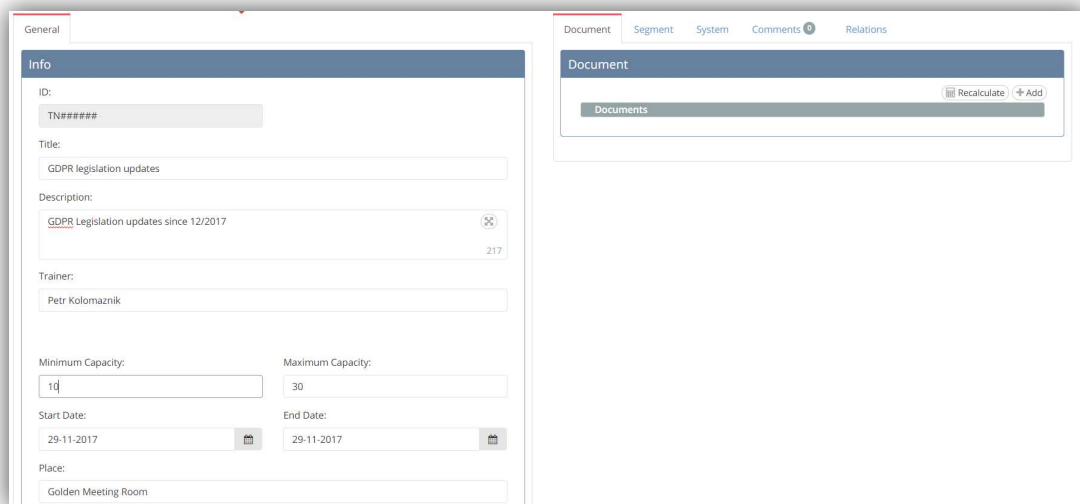*(n) the appropriate data protection training to personnel having permanent or regular access to personal data.*
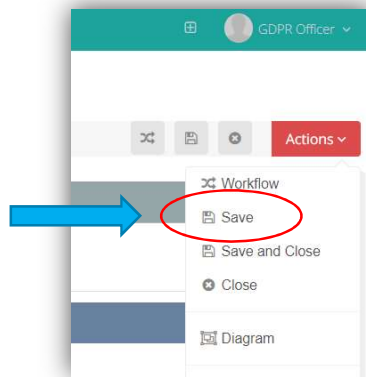
3.1 Go to the Training section
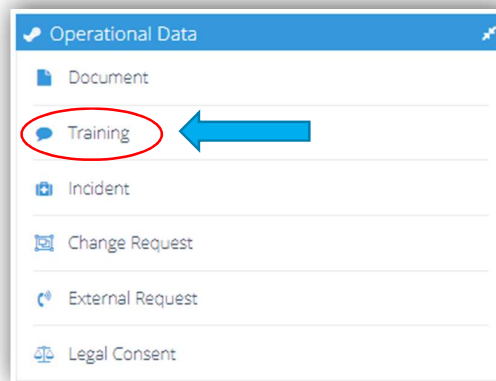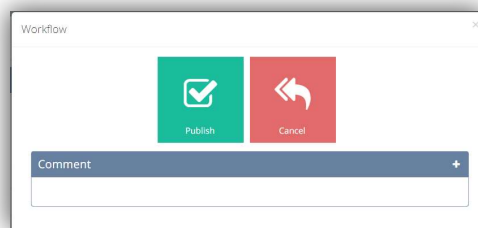

3.2 Fill in the Trainigns details

Fill in the short descriptions, add attachments as course prerequisities etc.

Once you are done, click on Save under Actions button.

The dialog box with Publish Option appears.
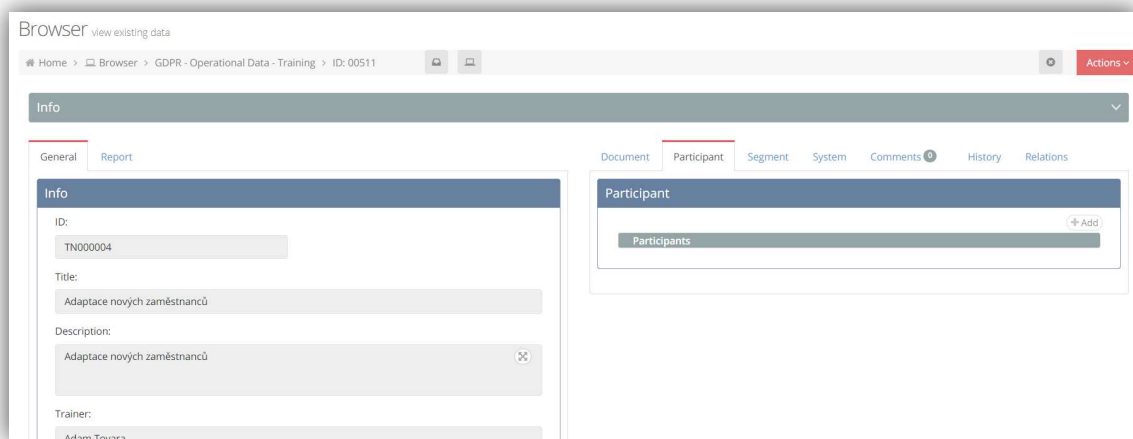

By clicking on Publish, the training become visible to people in your organization (they can also be notified via e-mail) and can start apply in.

Applying in is simple – employee goes to the training you created, under the red button Actions selects workflow and click „Register". Now he is registered and can be seen in the list of participants under the training details.
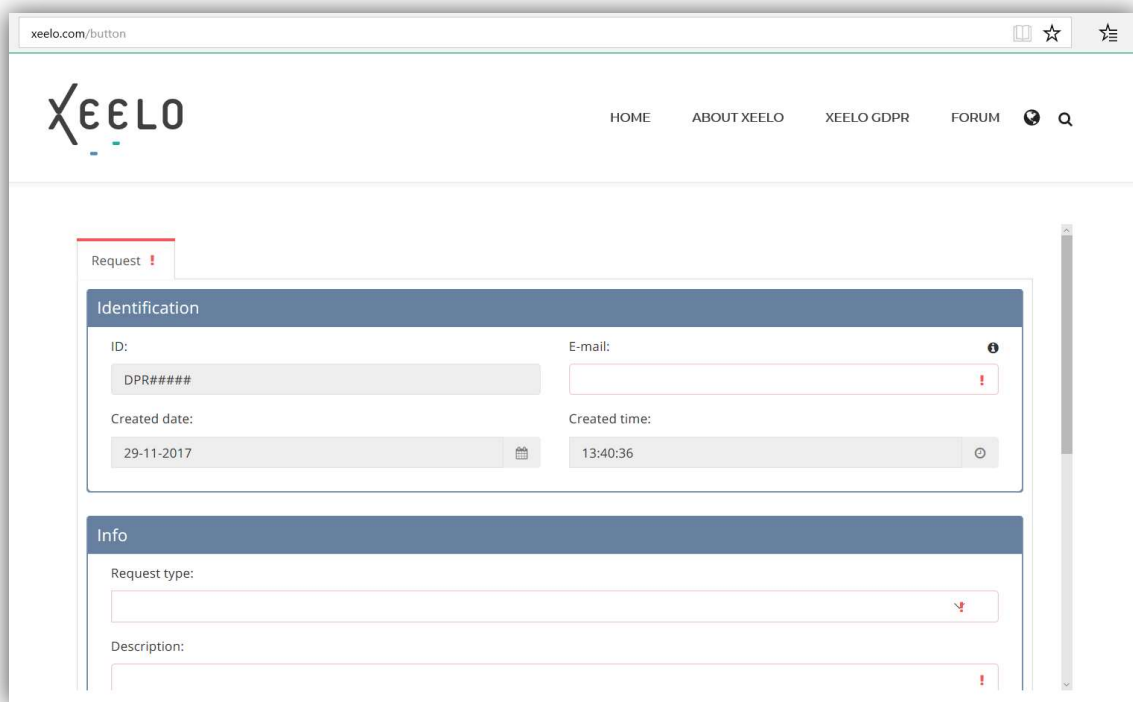
Situation 4 – External Information Request

Your customer requests detail about personal information you store on him. Fills in the built-in request form you have on Company website. The data from this form are automatically transferred to Xeelo - for purpose of Demo simulation we have prepared Test site.

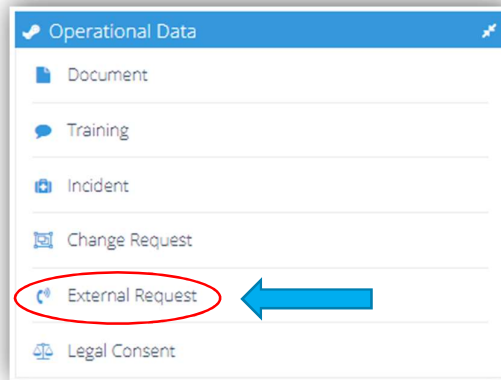***Recital 59 EU General Data Protection Regulation***
(59) Modalities should be provided for facilitating the exercise of the data subject's rights under this Regulation, including mechanisms to request and, if applicable, obtain, free of charge, in particular, access to and rectification or erasure of personal data and the exercise of the right to object. The controller should also provide means for requests to be made electronically, especially where personal data are processed by electronic means. The controller should be obliged to respond to requests from the data subject without undue delay and at the latest within one month and to give reasons where the controller does not intend to comply with any such requests.
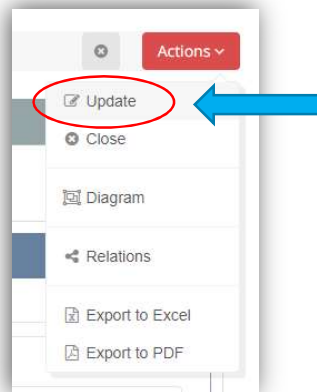
4.1 Go to the website http://xeelo.com/button/ and fill in the form

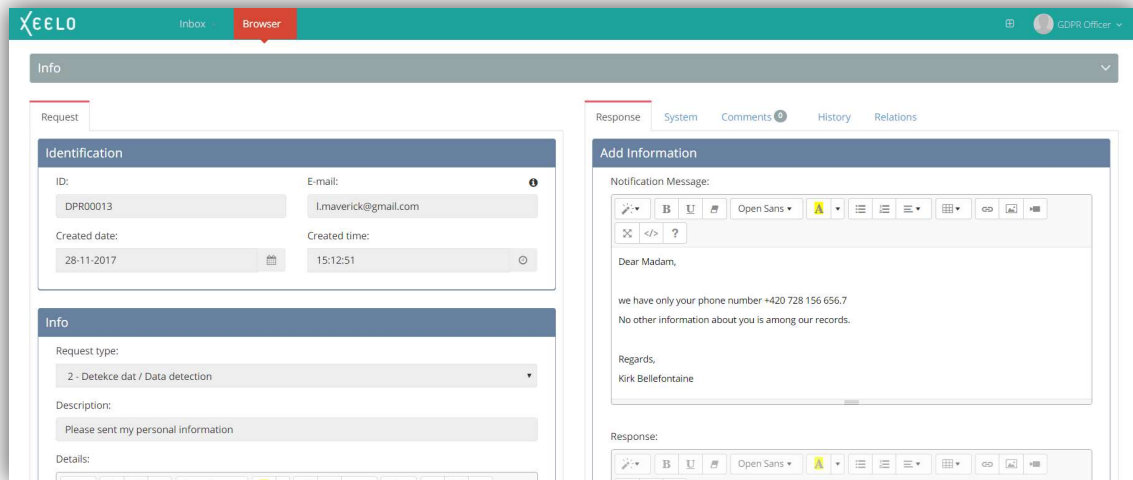## 4.2 Switch back to Xeelo and go to the External Request Section

4.3 Find the request you submitted and under Actions button click on update

4.4 Formulate response to the request
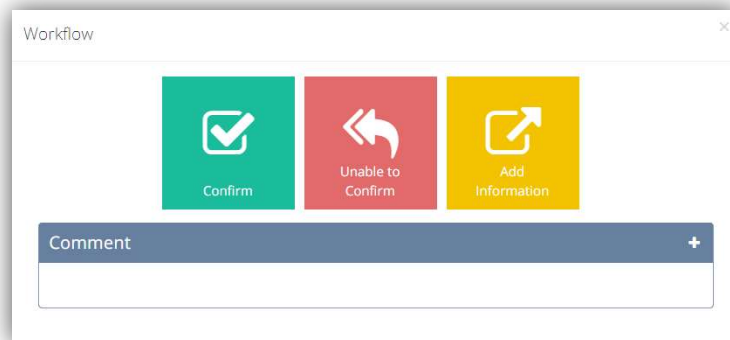
Now you are in the role of company employee responsible to handle the request. You would now check the relevant databases, record the result of search on the form (of course, Xeelo built in data map would assist you where to look for data) and formulates the respond to the request.

After that, proper workflow action is selected:

- Confirmation that customer was found in database
- Unable to Confirm in case no record was found
- Informations provided by custmer were insufficient to perform the search – request sent back for amendment from customer side

Closed request is stored in database and is later searchable by name etc.

Situation 5 – Customer consent with data processing

As new GDPR legislation came in force, you need clear consent from all your vendors / customers on processing of their personal data. You can manage it simply in Xeelo.

Recital 32 EU General Data Protection Regulation
(32) Consent should be given by a clear affirmative act establishing a freely given, specific, informed and unambiguous indication of the data subject's agreement to the processing of personal data relating to him or her, such as by a written statement, including by electronic means, or an oral statement.
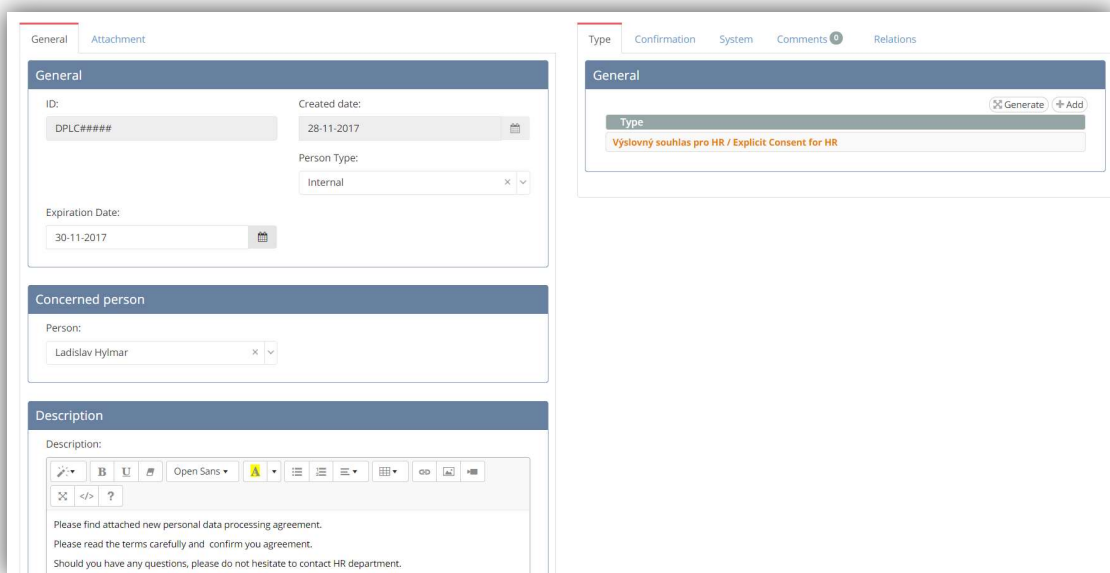
5.1 Go to the Legal Consent Section
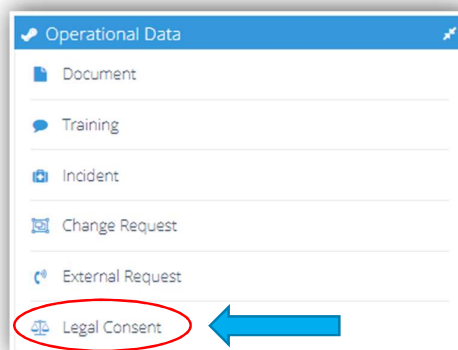
5.2 Fill the Legal Consent Request

Fill in the details as description, type of consent, consent expiration date (how long will be valid) or add the document as an attachment.

Of course, select the person from which you need the consent.

Once you are done, click on Save under Actions button and subseqeuntly Sent to internal in the opened dialog.
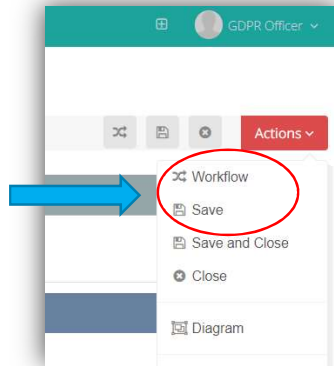
The request will be sent on employees e-mail where he/she can confirm or reject the consent.

One case or another, his / her answer will be automatically recorded back to Xeelo, serving as an eventual proof for state authority.

Situation 6 – New project

You are about to run new project in your Company. As part of the project, personal information will be processed. No matter whether it is installation of GPS units to your car fleet or implementation of artificial intelligence for analyzing customer journey – as per GDPR you are oblidged to perform deep impact assesment exercise for such project. Xeelo will assist You.

Recital 84 EU General Data Protection Regulation
*In order to enhance compliance with this Regulation where processing operations are likely to result in a high risk to the rights and freedoms of natural persons, the controller should be responsible for the carrying-out of a data protection impact assessment to evaluate, in particular, the origin, nature, particularity and severity of that risk. The outcome of the assessment should be taken into account when determining the appropriate measures to be taken in order to demonstrate that the processing of personal data complies with this Regulation.*
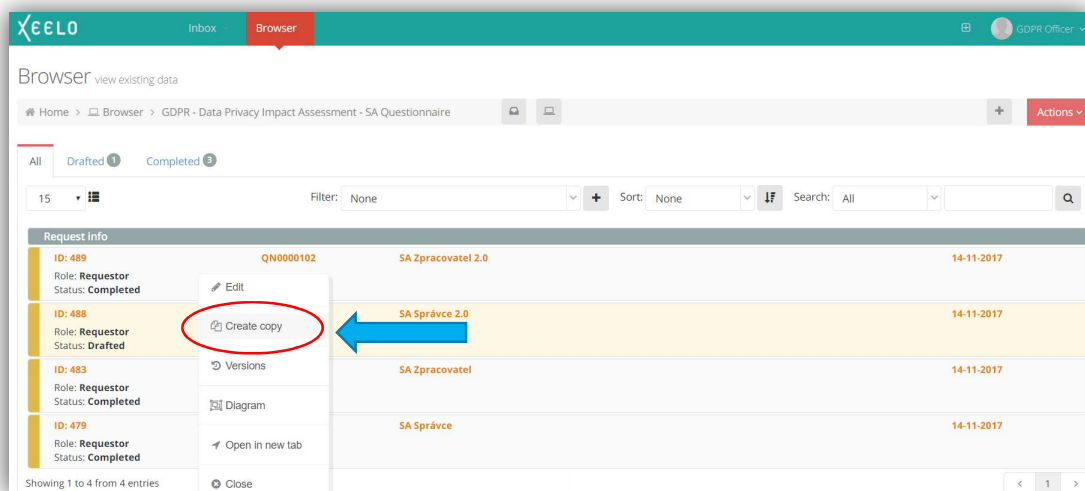
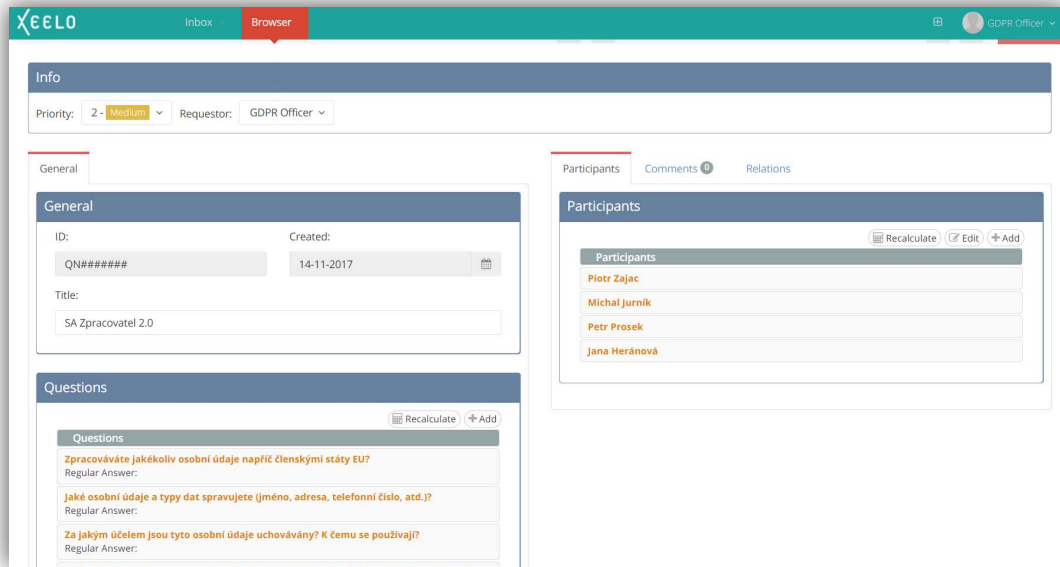## 6.1 Go to the SA Questionnaire Section
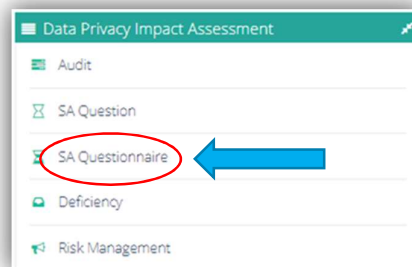
6.2 Create new Questionnaire

Now You have basically 2 options. Set up brand new Questionnaire or use existing templete / old one. We will show you how easy is second option.

Right click on any existing questionnaire and select „Create Copy" option
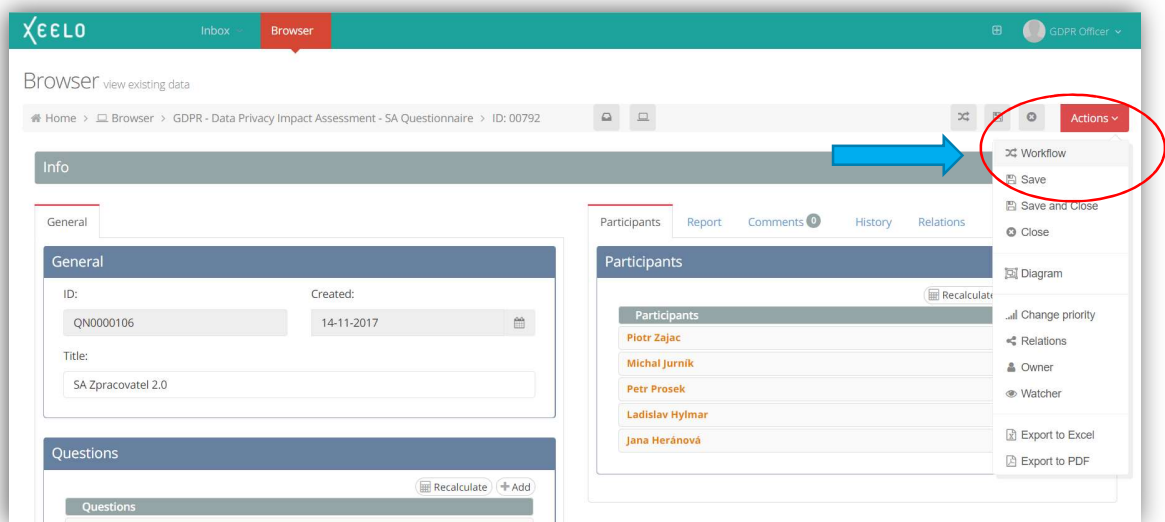
6.3 Edit the questionnaire

Now you can customize the questionnaire – remove some questions, add another from the questions pool, edit the list of questionnaire recipients etc.

Once done, click on Actions button, first select Save and then Workflow option.

Once you confirmed the Workflow option, link to questionnaire will be sent to selected people in your organization and they can answer their part. The whole process is paperless, all the time you can monitor who already responded and all actions regarding the questionnaire are automatically logged for purpose of eventual demonstration compliance to authorities / auditors.

Final note

Besides features mentioned above, the biggest added value of Xeelo in GDPR context is ability to assist with data mapping and subsequent demonstration of identified relationships. What does it mean?

Article 30 Records of processing activities

Each controller and, where applicable, the controller's representative, shall maintain a record of processing activities under its responsibility. That record shall contain all of the following information:
*(b) the purposes of the processing; (c) a description of the categories of data subjects and of the categories of personal data;*

4.The controller or the processor and, where applicable, the controller's or the processor's representative, shall make the record available to the supervisory authority on request.

As part of GDPR implementation you should among first steps identify all places where you store personal data. What software you use for customer evidence, employee evidence etc. You should identify not just systems, but also specific tables and fields within those systems.

If you use Xeelo for evidence of all above mentioned, as a result you will be able easily see where all you have data about customers, vendors – at reach of one click. Such initial set-up is not subject of this Demo, but you can see the results in our Demo environment.
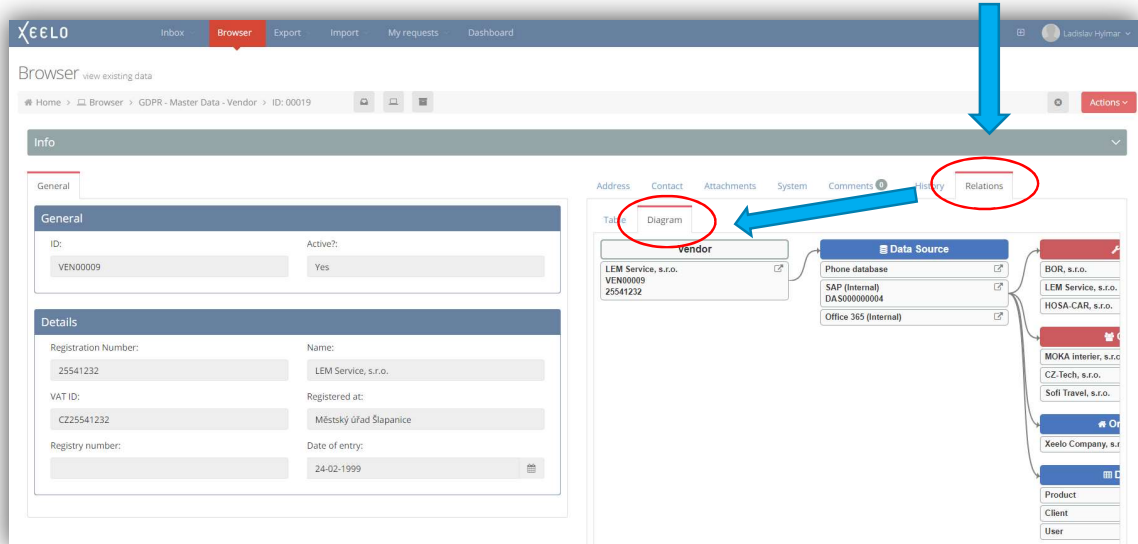
Go to the Vendor Section
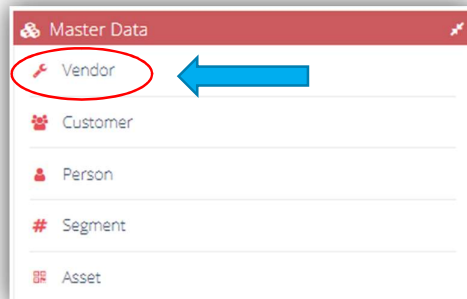
Click on any sample vendor

On the tab Relations and Sub-Tab Diagram you can easily see where all data about this vendor stored, where to look in case of external request and don't overlook something.

No matter if choose to have also your master data in Xeelo (meaning Customer Data, Vendor Data etc.) or to keep them in your current systems. Xeelo can serve you on pure abstract basis, to tell you just where the data about vendors are in general.