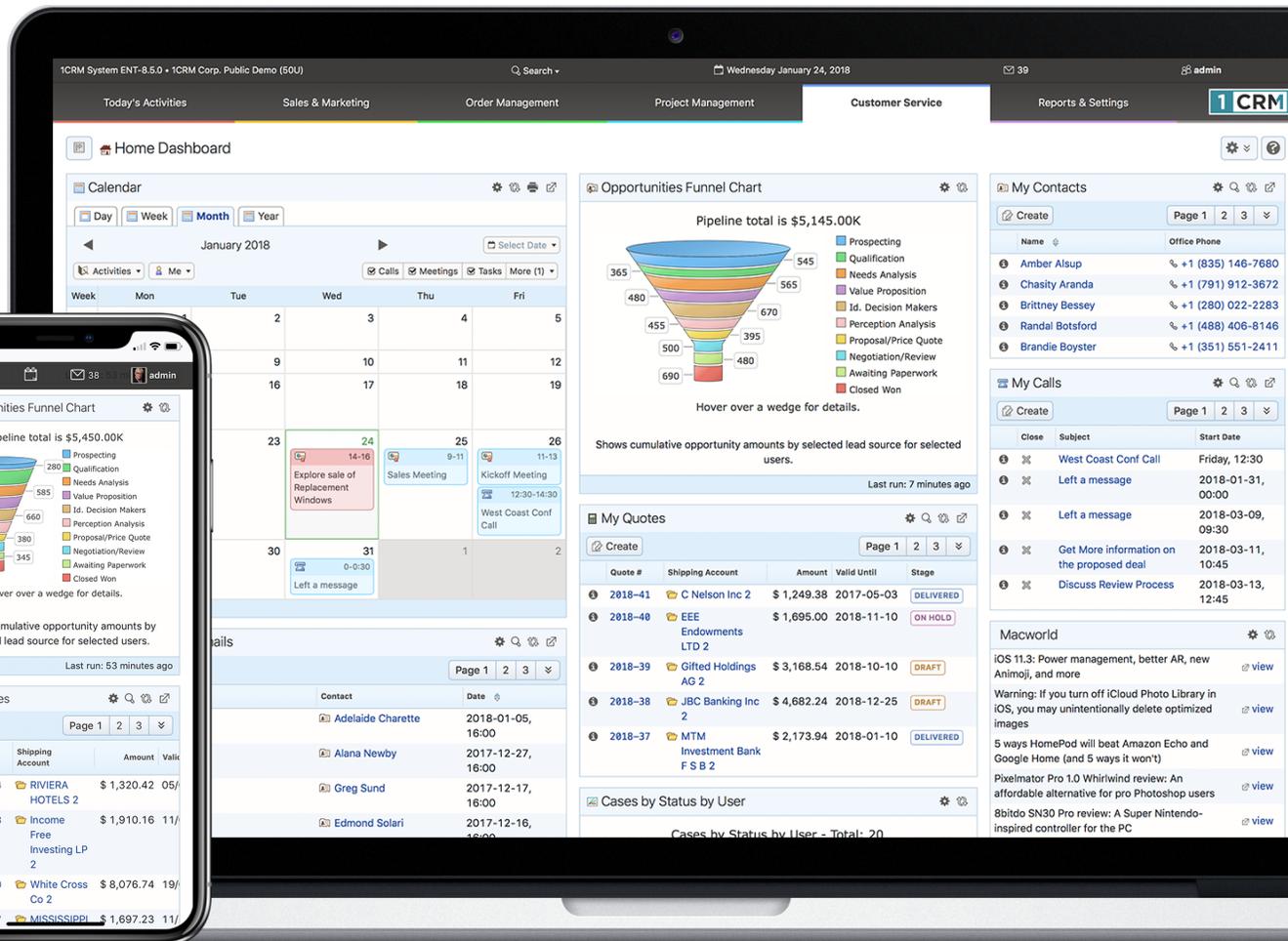


# 1CRM & GDPR

## A Discussion on the General Data Protection Regulation, and What 1CRM Clients Need to Know



## Background

The **General Data Protection Regulation (GDPR)** (Regulation (EU) 2016/679) is a regulation by which the European Parliament, the Council of the European Union, and the European Commission intend to strengthen and unify data protection for all individuals within the European Union (EU). It also addresses the export of personal data outside the EU.

The GDPR aims primarily to give control back to citizens and residents over their personal data and to simplify the regulatory environment for international business by unifying the regulation within the EU. When the GDPR takes effect, it will replace the 1995 Data Protection Directive (Directive 95/46/EC).

It was adopted on 27 April 2016. It becomes enforceable from 25 May 2018, after a two-year transition period.

While the GDPR is an EU regulation, it is important to note that in our interconnected digital world it has critical ramifications for businesses worldwide. It does not merely apply to EU businesses; any entities processing the personal data of EU citizens need to comply. Failure to comply will result in significant fines of up to 4% of annual revenue or €20 Million, whichever is more.

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### **Disclaimer**

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# 1.0 The Basics of GDPR

## 1.1 What is the scope of GDPR?

The **General Data Protection Regulation (GDPR)** applies to personal information about people. Personal information includes such information as a person's name, email address, mailing address, photograph, social links and IP address. The regulation also has strict rules for sensitive information such as medical history as well as for children's data. Sensitive personal information under GDPR also includes such data elements as the racial or ethnic origin of the data subject, political opinions, religious beliefs or other beliefs of a similar nature, membership of a trade union, sexual life, and criminal background.

GDPR generally does not apply to company data or any other non-person data such as Company Revenue.

## 1.2 What is a data processor vs. a data controller?

A *Data Controller* is a natural or legal person, entity, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

A *Data Processor* means a natural or legal person, entity, public authority, agency or other body which processes personal data on behalf of the Data Controller.

In the context of 1CRM, our customers are the Data Controllers. They determine what information to capture on their own prospects or customers (referred to as data subjects under the GDPR), and how the data will be processed. 1CRM is one software application through which the Data Controllers manage that information. 1CRM is a Data Processor application, as it only processes data on its service that the Data Controller instructs it to process.

Under GDPR, Data Controllers and Data Processors have separate responsibilities and obligations for the protection and privacy of personal data.

## 1.3 What is data processing?

Processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

## 2.0 1CRM Product Capabilities

### 2.1 How has 1CRM adjusted to meet GDPR?

Data Privacy and Security have always been a key focus for 1CRM, and accordingly we have made comprehensive revisions to 1CRM to meet GDPR requirements. We are excited to introduce these changes to 1CRM in order to further enable our customers to address their responsibilities as Data Controllers. We believe you'll agree we have an industry-leading solution to manage GDPR compliance.

These data privacy related features are made available for general client use in the Spring 2018 (1CRM 8.5) release of 1CRM and are included in all editions and for On-Premise, Cloud and OEM customers. This release became available in early May, 2018.

In the table below, we explain how various GDPR requirements map onto enhanced data privacy features in 1CRM 8.5, in order to help Data Controllers comply with GDPR.

#### ➔ 2.1.1 Lawfulness of Processing

Requirement	How 1CRM Handles It
<b>Managing Consent</b>	<p>Controllers can record if consent has been received and for what business purposes. Consent related custom fields may be added to the leads, contacts and targets modules. Customers can also add custom fields in web-to-lead forms to manage consent from individuals.</p> <p>Consent can also be withdrawn by the data subject. All changes to consent over time may be tracked in the Data Privacy module.</p>
<b>Opt In Policy</b>	<p>GDPR requires that collected email addresses be automatically opted-out of receiving marketing emails. Emails can be opted-in only by request of the individual. Customers who capture leads electronically on web forms can easily record the preference of each visitor as indicated on the web form on the resulting lead in 1CRM.</p> <p>If an email is set to <i>Opt Out</i>, users can still send business-legitimate emails but should not send marketing materials.</p>
<b>Data Minimization</b>	<p>Customers should only process data that is relevant to their business purposes. Any data on individuals that is not relevant should be removed. These unneeded fields can easily be removed using the Studio.</p>

## ➔ 2.1.2 Data Subject Requests

Requirement	How 1CRM Handles It
<b>Recording data subject requests</b>	<p>A new Data Privacy module allows 1CRM Data Privacy Managers to log events such as data subject requests or consent and also record the resulting actions taken.</p> <p>This module is configurable just like any other module. By default the module is related to Leads, Contacts and Targets, but it can be related to any other module using the Studio.</p>
<b>Right to Access</b>	<p>We introduced a Personal Information View which displays the latest personal information and the source. The contents of the view may be sent to data subjects when they request access to their personal data.</p> <p>Admins can define what fields are considered personal information in the Studio. The Personal Information View will then display (or Print to PDF) fields that are marked personal information.</p>
<b>Right to Erase</b>	<p>Data subjects can request permanent erasure of some or all of their data. The request is first logged in the Data Privacy module.</p> <p>We have added a new role called Data Privacy Manager (DPM). Customers can assign their designated Data Privacy users to this role.</p> <p>A DPM may review requests and mark relevant records for erasure. They may also select individual personal information fields for erasure. e.g remove social links.</p> <p>Once they complete the erasure process, the selected personal fields will have their values removed. Personal information from the Change Logs will also be removed.</p> <p>Fields that are erased through this process will be displayed as <i>Value erased</i>. These fields will still be editable, assuming that users have received the appropriate consent to re-enter information about data subjects.</p> <p>The existing delete functionality is still available to users. Erasure behaves differently than deletion in that:</p> <ol style="list-style-type: none"> <li>1. Erasure permanently removes the data from the database such that it is not retrievable again.</li> <li>2. Erasure can only be performed by users with the DPM role.</li> </ol> <p>The Change Log records which fields were erased for later reference.</p>
<b>Right to Rectify</b>	<p>Users can correct information using existing functionality. Changes to personal data will be maintained in the Change Log.</p>
<b>Right to Portability</b>	<p>Users can export the personal information from the list view using the Export option and email it to the data subject.</p>
<b>Right to Object to Processing</b>	<p>Data subject may request that they object to processing of information. In such a case, the records should be marked so that they are not available for processing.</p> <p>Customers can add custom fields e.g. a flag that says this record is not to be processed or used in profiling for automated decision making. This field can then be used as a filter in campaigns, reports or other business processes.</p>

## 2.2 What are the specific 1CRM changes?

Here are the key product capabilities that were added to address Data Privacy requirements:

1. A new module was added to capture all *Data Privacy* activities, including consent and data subject rights. The records in this module are called *Data Privacy Activities*.

Each *Data Privacy Activity* records a particular activity related to personal data, such as a request from the personal data subject (the GDPR term for your client or prospect) to erase their personal data, to grant or withdraw their personal data consent, or to request to view their personal data.

Each *Data Privacy Activity* has a *Type* - it can be *Right to Erase* their personal data, *Consent to Process*, *Withdrawal of Consent* or *Request to View*.

Each *Data Privacy Activity* can be associated with a record in another module that represents a personal data subject. The modules used by default are Contacts, Leads and Targets, but this can be changed.

**Note:** Creating a *Data Privacy Activity* doesn't modify the related personal data subject (Lead, Contact or Target, for example) record in any way. You are simply logging a *Data Privacy* event - how it is handled it is up to you.

The screenshot shows the 1CRM user interface for creating a new Data Privacy Activity. The top navigation bar includes 'Today's Activities', 'Sales & Marketing', 'Order Management', 'Project Management', 'Customer Service', and 'Reports & Settings'. The main content area is titled 'Data Privacy - (new record)'. The form contains the following fields:

- Subject:** Created New Lead with Consent
- Related To:** Jackie Perham
- Type:** Consent to Process
- Status:** In Progress
- Source:** Web Form
- Source Description:** 1crm.com site, Free Trial Request Form
- Consent:** Consent To Process
- Description:** Client checked field to agree to our use of their personal data for communications purposes re 30-day free trial.

Figure 1: Creating a Data Privacy Activity

2. A new Role was added - *Data Privacy Manager* (DPM) - plus added Role permissions. Add this Role to any user to allow them access to the Data Privacy module (notice that access to the Data Privacy module is *Enabled* in the Figure below - it is *Disabled* in the Default Role).

New Role permissions have also been added, which when enabled allow a user to erase the data in fields of any module which are marked as Personal Data (see the *Personal* column in the Figure below - short for *Manage Personal Data* capability). Erasing Personal Data fields also

erases the historical values in *Change Log* entries for those fields (the log records themselves are not deleted, but *before* and *after* values are erased). Erased fields are shown as *Value Erased*. As well, this option enables access to Personal Data views, detail views which only display fields marked as Personal Data, regardless of their visibility in any conventional layout.

The screenshot displays the 'Roles - Data Privacy Manager' interface. At the top, it shows the role name 'Data Privacy Manager' and its description: 'Default role for users allowed to manage personal information'. Below this, there are several sections, each containing a table of permissions for different modules. The 'Personal' column is highlighted with a blue circle, indicating that this role has access to personal data views. The 'Data Privacy' role is highlighted with a blue circle at the bottom of the list.

Module	Access	View	List	Edit	Delete	Import	Export	Report	Approve	Personal
Calendar	Enabled									
Calls	Enabled	All	All	All	All	All	All	All	All	
Chats	Enabled	All	All	All	All		All	All	All	
Email	Enabled	All	All	All	All		All	All	All	
Email Folders	Enabled	Owner	Owner	Owner	Owner		Owner	Owner		
Email Templates	Enabled	All	All	All	All		All	All	All	
Forum Categories	Limited	All	All	Admin	Admin		Admin	Admin		
Forum Threads	Enabled	All	All	All	All		All	All	All	
Forums	Limited	All	All	Admin	Admin		Admin	Admin		
Meetings	Enabled	All	All	All	All	All	All	All	All	
Notes	Enabled	All	All	All	All	All	All	All	All	
Resources	Limited	All	All	Admin	Admin		Admin	Admin		
Tasks	Enabled	All	All	All	All	All	All	All	All	
Vacations & Sick days	Enabled	Owner	Owner	Owner	Owner		Owner	Owner		Disabled
<b>Sales &amp; Marketing</b>										
Accounts	Enabled	All	All	All	All	All	All	All	All	
Campaigns	Enabled	All	All	All	All		All	All	All	
Contacts	Enabled	All	All	All	All	All	All	All	All	All
Documents	Enabled	All	All	All	All		All	All		
Event Types	Limited	All	All	Admin	Admin		Admin	Admin		
Forecasts	Enabled	All	All	All	All		All	All		
Leads	Enabled	All	All	All	All	All	All	All	All	All
Marketing Events	Enabled	All	All	All	All		All	All	All	
Opportunities	Enabled	All	All	All	All	All	All	All	All	All
Partners	Enabled	All	All	All	All		All	All	All	
Target Lists	Enabled	All	All	All	All		All	All	All	
Targets	Enabled	All	All	All	All	All	All	All	All	All
<b>Order Management</b>										
Assemblies	Enabled	All	All	All	All		All	All		
Bills	Enabled	All	All	All	All		All	All		
Credit Notes	Enabled	All	All	All	All		All	All		
Discounts	Limited	All	All	Admin	Admin		Admin	Admin		
Invoices	Enabled	All	All	All	All		All	All		
Models	Enabled	All	All	All	All		All	All		
Payments	Enabled	All	All	All	All		All	All		
Price Books	Enabled	All	All	All	All	All	All	All	All	
Product Catalog	Enabled	All	All	All	All	All	All	All	All	
Product Categories	Limited	All	All	Admin	Admin	Admin	Admin	Admin		
Product Types	Limited	All	All	Admin	Admin		Admin	Admin		
Purchase Orders	Enabled	All	All	All	All		All	All	All	
Quotes	Enabled	All	All	All	All		All	All	All	Disabled
Receiving	Enabled	All	All	All	All		All	All	All	
Sales Orders	Enabled	All	All	All	All		All	All	All	
Shipping	Enabled	All	All	All	All		All	All	All	
Shipping Providers	Limited	All	All	Admin	Admin		Admin	Admin		
Tax Codes	Limited	All	All	Admin	Admin		Admin	Admin		
Tax Rates	Limited	All	All	Admin	Admin		Admin	Admin		
<b>Project Management</b>										
Booked Hours	Enabled	All	All	Owner	Owner		All	All	Disabled	
Booking Categories	Limited	All	All	Admin	Admin		Admin	Admin		
Expense Reports	Enabled	Owner	Owner	Owner	Owner		Owner	Owner	Disabled	
Human Resources	Enabled	Owner	Owner	Owner	Disabled		Admin	Owner		
Project Tasks	Enabled	All	All	All	All		All	All		
Projects	Enabled	All	All	All	All		All	All	All	
Timesheets	Enabled	Owner	Owner	Owner	Owner		Owner	Owner	Disabled	
<b>Customer Service</b>										
Cases	Enabled	All	All	All	All	All	All	All		
Knowledge Base	Enabled	All	All	All	All		All	All		
Recurring Services	Enabled	All	All	All	All		All	All		
Releases	Limited	All	All	Admin	Admin		Admin	Admin		
Service Contract Types	Limited	All	All	Admin	Admin		Admin	Admin		
Service Subcontracts	Enabled	All	All	All	All		All	All		
Software Bugs	Enabled	All	All	All	All		All	All		
Software Products	Limited	All	All	Admin	Admin		Admin	Admin		
Supported Assemblies	Enabled	All	All	All	All		All	All	All	
Supported Products	Enabled	All	All	All	All		All	All	All	
<b>Reports &amp; Settings</b>										
Activity Log	Limited	All	All	Admin	Admin		Admin	Admin		
Dashboard	Enabled	Team	Team	Owner	Team		Team	Team		
Data Privacy	Enabled	None	None	None	None		Disabled	Disabled	Disabled	
System Settings	Limited	All	All	Admin	Admin		Admin	Admin		

Figure 2: Role Changes

- When any Data Privacy Activity is associated with a personal data subject record (by default, a Target, Lead or Contact), the detail view for that Data Privacy Activity record will include a *View Personal Data* button. This displays a special view showing all personal data fields from that personal data subject record (Figure 4 below), and providing a *Print* button to render this personal data as a PDF (see Figure 5).

In addition, if the Data Privacy Activity type is *Right to Erase*, the detail view will offer an *Erase Personal Data* button. Pressing this button then allows the user to select which fields to erase (Figure 6 below).

The *View Personal Data* and *Erase Personal Data* buttons are also available on the detail view of the record for the person related to the Data Privacy Activity, as seen in Figure 3 below.

1CRM System ENT-8.5.0 • 1CRM Corp. Public Demo (50U) Search Saturday May 5, 2018 41 admin

Today's Activities Sales & Marketing Order Management Project Management Customer Service Reports & Settings 1 CRM

Leads - Jackie Perham << Created New Lead with Consent

Jackie Perham ☆  
President  
pro87@example.eu  
+1 (059) 250-2203 work  
+1 (670) 646-4558 home  
+1 (425) 741-1777 mobile

Converted

Converted Contact  
Jackie Perham

Status: RECYCLED Lead Source: Trade Show

Primary Address: 48920 San Carlos, Sunnyvale, CA 31687 USA

Portal Information

Portal Active: Portal Name:

View Personal Data Erase Personal Data Manage Subscriptions

Activities

Compose Email Schedule Meeting Schedule Call Create Task No results

History

Create Note or Attachment Archive Email View Summary No results

Marketing Events

Create Add Existing No results

Campaigns

No results

Documents

Create Add Existing No results

Data Privacy Activities

Subject	Type	Source	Status	Related To	Date Created
Created New Lead with Consent	Consent to Process	Web Form	In Progress	Jackie Perham	Yesterday, 12:16

Figure 3: Lead Detail View, Showing Personal Data Controls & Activities Subpanel

Print Cancel

<b>ID</b> 8282f3b3-193e-bdd0-15ca-5aecabf059ec	
<b>First Name</b> Jackie	<b>Last Name</b> Perham
<b>Title</b> President	<b>Email</b> ✉ pro87@example.eu
<b>Other Email</b>	<b>Office Phone</b> ☎ +1 (059) 250-2203
<b>Home Phone</b> ☎ +1 (670) 646-4558	<b>Mobile</b> ☎ +1 (425) 741-1777
<b>Salutation</b>	<b>Primary Address Street</b> 48920 San Carlos
<b>Primary Address City</b> Sunnyvale	<b>Primary Address State</b> CA
<b>Primary Address Postalcode</b> 31687	<b>Primary Address Country</b> USA

Figure 4: Personal Data View, With Print Button

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### Personal Data : Leads

<b>ID</b>	8282f3b3-193e-bdd0-15ca-5aecabf059ec		
<b>First Name</b>	Jackie	<b>Last Name</b>	Perham
<b>Title</b>	President	<b>Email</b>	pro87@example.eu
<b>Other Email</b>		<b>Office Phone</b>	+1 (059) 250-2203
<b>Home Phone</b>	+1 (670) 646-4558	<b>Mobile</b>	+1 (425) 741-1777
<b>Other Phone</b>		<b>Skype ID</b>	
<b>Website</b>		<b>Fax Number</b>	
<b>Salutation</b>		<b>Primary Address Street</b>	48920 San Carlos
<b>Primary Address City</b>	Sunnyvale	<b>Primary Address State</b>	CA
<b>Primary Address Postalcode</b>	31687	<b>Primary Address Country</b>	USA
<b>Primary Address State Code</b>		<b>Primary Address Country Code</b>	
<b>Alt Address Street</b>		<b>Alt Address City</b>	
<b>Alt Address State</b>		<b>Alt Address Postalcode</b>	
<b>Alt Address Country</b>		<b>Alternate Address State Code</b>	
<b>Alternate Address Country Code</b>			

Figure 5: PDF for Printing Personal Data (Top Portion only)

LBL_MODULE	Current Value	Erase?
Salutation		<input type="checkbox"/>
First Name	Jackie	<input checked="" type="checkbox"/>
Last Name	Perham	<input checked="" type="checkbox"/>
Title	President	<input checked="" type="checkbox"/>
Home Phone	% +1 (670) 646-4558	<input checked="" type="checkbox"/>
Mobile	☐ +1 (425) 741-1777	<input checked="" type="checkbox"/>
Office Phone	% +1 (059) 250-2203	<input checked="" type="checkbox"/>
Other Phone		<input type="checkbox"/>
Fax Number		<input type="checkbox"/>
Skype ID		<input type="checkbox"/>
Email	☐ pro87@example.eu	<input checked="" type="checkbox"/>
Other Email		<input type="checkbox"/>
Website		<input type="checkbox"/>
Primary Address Street	48920 San Carlos	<input checked="" type="checkbox"/>
Primary Address City	Sunnyvale	<input checked="" type="checkbox"/>
Primary Address State	CA	<input checked="" type="checkbox"/>
Primary Address Postalcode	31687	<input checked="" type="checkbox"/>
Primary Address Country	USA	<input checked="" type="checkbox"/>
Primary Address State Code		<input type="checkbox"/>
Primary Address Country Code		<input type="checkbox"/>
Alt Address Street		<input type="checkbox"/>
Alt Address City		<input type="checkbox"/>
Alt Address State		<input type="checkbox"/>
Alt Address Postalcode		<input type="checkbox"/>
Alt Address Country		<input type="checkbox"/>
Alternate Address State Code		<input type="checkbox"/>
Alternate Address Country Code		<input type="checkbox"/>

Figure 6: Erasing Personal Data

- In the 1CRM Enterprise Edition, admin users can use the Module Designer to configure which modules and standard fields are to be considered as *Personal Data*.
- In non-Enterprise editions, admin users have a new Administration screen - *Configure Personal Data* - to configure which modules and standard fields are to be considered as *Personal Data*. First select the module to work with:

Figure 7: Configure Personal Data (Admin Function)

Then mark the Personal Data fields, and Save.

1CRM System PRO-8.5.1 + 1CRM Corp. Public Demo (Professional Edition) (6U) Friday May 25, 2018 35 admin

Today's Activities Sales & Marketing Order Management Project Management Customer Service Reports & Settings **1 CRM**

Studio - Configure Personal Data (Contacts) ⚙️ ⓘ

Save Cancel

This Module Contains Personal Data?

*This screen is used for standard fields only. Use Custom Fields Editor to manage custom fields with personal data.*

Select Fields with Personal Data

Field	Personal Data?	Privacy Consent?
Deleted	<input type="checkbox"/>	<input type="checkbox"/>
Modified by	<input type="checkbox"/>	<input type="checkbox"/>
Assigned to	<input type="checkbox"/>	<input type="checkbox"/>
Created by	<input type="checkbox"/>	<input type="checkbox"/>
Name	<input type="checkbox"/>	<input type="checkbox"/>
Primary Account	<input type="checkbox"/>	<input type="checkbox"/>
B2C Account	<input type="checkbox"/>	<input type="checkbox"/>
Category	<input type="checkbox"/>	<input type="checkbox"/>
Business Role	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Salutation	<input checked="" type="checkbox"/>	<input type="checkbox"/>
First Name	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Last Name	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Lead Source	<input type="checkbox"/>	<input type="checkbox"/>
Title	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Department	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Reports To	<input type="checkbox"/>	<input type="checkbox"/>
Birthdate	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Do Not Call	<input type="checkbox"/>	<input type="checkbox"/>
Accounting Contact	<input type="checkbox"/>	<input type="checkbox"/>
phone_home_raw	<input type="checkbox"/>	<input type="checkbox"/>
phone_mobile_raw	<input type="checkbox"/>	<input type="checkbox"/>
phone_work_raw	<input type="checkbox"/>	<input type="checkbox"/>
phone_other_raw	<input type="checkbox"/>	<input type="checkbox"/>
phone_fax_raw	<input type="checkbox"/>	<input type="checkbox"/>
Email	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other Email	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Assistant	<input checked="" type="checkbox"/>	<input type="checkbox"/>
assistant_phone_raw	<input type="checkbox"/>	<input type="checkbox"/>
Email Opt Out	<input type="checkbox"/>	<input type="checkbox"/>
Email Opt In	<input type="checkbox"/>	<input type="checkbox"/>
Email Opt-in Date	<input type="checkbox"/>	<input type="checkbox"/>
Website	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Primary Address Street	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Primary Address City	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Primary Address State	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Primary Address Postal Code	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Primary Address Country	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Primary Address State Code	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Primary Address Country Code	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Alternate Address Street	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Alternate Address City	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Alternate Address State	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Alternate Address Postal Code	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Alternate Address Country	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Alternate Address State Code	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Alternate Address Country Code	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Description	<input type="checkbox"/>	<input type="checkbox"/>
Portal Name	<input type="checkbox"/>	<input type="checkbox"/>
Portal Active	<input type="checkbox"/>	<input type="checkbox"/>
Portal Application	<input type="checkbox"/>	<input type="checkbox"/>
Invalid Email	<input type="checkbox"/>	<input type="checkbox"/>
Partner	<input type="checkbox"/>	<input type="checkbox"/>
Campaign	<input type="checkbox"/>	<input type="checkbox"/>
vcard_size	<input type="checkbox"/>	<input type="checkbox"/>
vcard	<input type="checkbox"/>	<input type="checkbox"/>
vcard_uri	<input type="checkbox"/>	<input type="checkbox"/>
Consent To Process	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Live Chat Activity	<input type="checkbox"/>	<input type="checkbox"/>
Lead Guerrilla Contact ID	<input type="checkbox"/>	<input type="checkbox"/>
Chat Activity	<input type="checkbox"/>	<input type="checkbox"/>
Personal Information Source	<input type="checkbox"/>	<input type="checkbox"/>

Figure 8: Configure Personal Data for Contacts Module

6. In all 1CRM editions, custom fields may be marked as *Personal Data* by admin users, with the *Custom Fields Editor*.

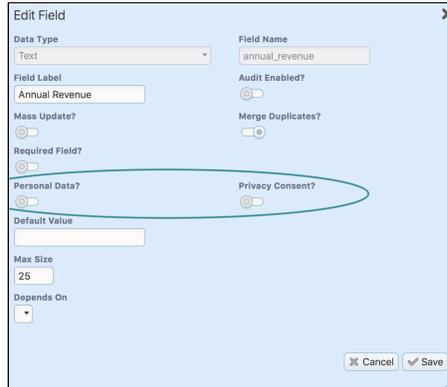


Figure 9: Custom Fields Editor

7. In both of the Figures above we see the *Personal Data* property for a field, as well as the *Privacy Consent* property. All fields may be marked as *Personal Data* fields, or as *Privacy Consent* fields. While we now know what the first type means, what does the second type mean, and how is it used?

If a field is marked as *Privacy Consent*, it will be available as an option for the *Consent* dropdown selection field when logging a Data Privacy event (see Figure 1 above). That way the user can indicate that this particular Data Privacy event is related to this particular kind of consent, as you may receive multiple types of consent from your clients - for specific actions they say they find acceptable.

**Note:** This is for information purposes only, and does not trigger any automated action. How the field is used is up to the user, marking it as privacy consent does not modify its behaviour in any other way.

For example, you might have three fields in your Contacts module marked as *Privacy Consent*: *Basic Consent to Process*, *Consent for Newsletters* and *Consent for Special Offers*. Then, if you create a Data Privacy record for a Contact, you could select *Consent for Newsletters* for the *Consent* field, to identify that this particular Data Privacy record is related to *Consent for Newsletters*.

## 2.3 What do Administrators need to know?

### ➔ 2.3.1 Data Privacy Module

Make sure this module is enabled in Administration for the Role used for your Data Privacy Manager. The *Data Privacy* module has a *many to many* relationship with *Leads*, *Contacts* and *Targets*. The module can also be related to other modules, including custom modules, by using the Module Designer in 1CRM Enterprise Edition, or the *Configure Personal Data* screen in other Editions.

**Note:** The *Status* field is a dropdown list whose values should not be altered.

### ➔ 2.3.2 List of Values - Type

1CRM provides the type of data privacy activity that are relevant under GDPR such as data subject rights, consent receipt and consent withdrawal. You can customize the labels in this list of values. The only restriction is that the following types cannot be removed (label can be changed) -

- Right to Erase Information
- Consent to Process
- Withdraw Consent
- Request to View

### ➔ 2.3.3 Consent fields

Two consent fields are included for leads, contacts and targets respectively - *Personal Information Source* and *Consent To Process*. To use these fields, add them to the record view layout.

### ➔ 2.3.4 Mark fields as personal information

In the Module Designer (in 1CRM Enterprise Edition), or the *Configure Personal Data* screen (in other Editions), each field can be marked as personal information. This is used for the personal information view and for the erase process. 1CRM has marked specific fields in the Leads, Targets and Contacts module as personal information by default.

### ➔ 2.3.5 Assigning users to DPM

The Data Privacy Manager (DPM) role is included out of the box. Designated users who will perform data privacy related tasks should be assigned to this role. Users in the DPM role will be able to perform tasks such as erasure.

## 3.0 Data Protection in the 1CRM Cloud

### *3.1 How is personal information protected in the 1CRM cloud?*

1CRM Systems Corp. has put in place plans to protect our customers' data in the cloud and has the processes necessary to perform our obligations as data processor.

- We have implemented policies, and will continue to implement further policies and reasonable measures, necessary for securing personal data and for mitigating potential negative consequences for data subjects.
- In the event of a data breach, we have policies and procedures in place to notify our customers.
- We have implemented the necessary technical and organizational measures, including logical access, physical access, intervention control, transfer control, input control, separation control, availability controls, change management, logging, monitoring, restoring and encryption.
- We intend to process the personal data as necessary to perform our obligations in accordance with GDPR. We further plan to document all records of processing activities such as backups and its maintenance, logging, monitoring and testing activities.
- For further details, see our [Technical & Organizational Security Measures](#).

## 4.0 Data Controller Responsibilities

### 4.1 *What are the responsibilities of 1CRM customers as data controllers ?*

1CRM customers are the *Data Controllers* for the client data contained within their 1CRM systems, and are required to have their systems and processes in place to comply with GDPR.

**Note:** 1CRM is not responsible for customers' obligations as *Data Controllers*.

The complete text of the GDPR is publicly available here for [reference](#). The items below are headlines for various GDPR requirements. We encourage you to reach out to your counsel and/or compliance group to ensure your organization is ready to comply with GDPR.

### 4.2 *Lawfulness of processing*

- Purpose Limitation and Data Minimization
- Accurate data
- Storage limitation
- Confidentiality
- Accountability
- Consent to processing
- Opt In / Opt Out policy
- Processing of special categories of data
- Processing of children's data

### 4.3 *Data Subject Rights*

- Right of information (Article 13 and 14)
- Right of access to personal information (Article 15)
- Right to rectify personal information (Article 16)
- Right to erasure or right to be forgotten (Article 17)
- Right to restriction of processing of data (Article 18)
- Right to data portability (Article 20)
- Right to object to processing (Article 21)

- Right to object to automated decision making, including profiling (Article 22)

### *4.4 Organization and Processes*

- Record of processing activities (Article 30)
- Appointing a Data Protection Officer (DPO)
- Technical and Organizational Measures

# 1CRM & GDPR

## A Discussion on the General Data Protection Regulation, and What 1CRM Clients Need to Know

