

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

1CRM System ENT-8.5.0 • 1CRM C	Corp. Public Demo (50U)	Q Search +	🛱 Wednesday Jan	uary 24, 2018	⊠ 39	88 admin
Today's Activities	Sales & Marketing	Order Management	Project Management	Customer Service	Reports & Settings	
📧 🗂 Home Dashb	oard					* × Ø
🚍 Calendar		* 10 = 2	🔊 Opportunities Funnel Chart	* 0.	My Contacts	¢ Q (0, ⊄
Day Week N	Aonth 🔄 Year		Pipeline total is	\$5,145.00K	Create	Page 1 2 3 ¥
■ N Activities ■ Act	January 2018	Eetings Staks More (1)	365	Prospecting 545 Qualification	Name 💠	Office Phone % +1 (835) 146-7680
Week Mon	Tue Wed Th	u Fri	480 - 56	5 Needs Analysis Value Proposition Id. Decision Makers	<ul><li>Chasity Aranda</li><li>Brittney Bessey</li></ul>	% +1 (791) 912-3672 % +1 (280) 022-2283
12:26	2 3	4 5	455 - 395	Perception Analysis Proposal/Price Quote	<ul><li>Randal Botsford</li><li>Brandie Boyster</li></ul>	% +1 (488) 406-8146 % +1 (351) 551-2411
🚍 🔍 🛱 🗹 38 53 m 🚺 admin	9 10 16 17	11 12 18 19	690 - 480	<ul> <li>Negotiation/Review</li> <li>Awaiting Paperwork</li> <li>Closed Won</li> </ul>	🕿 My Calls	<b>\$</b> \\$ \\$ Z
🔊 Opportunities Funnel Chart 🌼 🖏			Hover over a wedg	ge for details.	Create	Page 1 2 3 ×
Pipeline total is \$5,450.00K	23 24 © 14-16	25 26 9-11 🜚 11-13	Shows cumulative opportunity amounts b users.		Close Subject	Start Date Friday, 12:30
840 Needs Analysis	Explore sale of Replacement Windows	12:30-14:30		Last run: 7 minutes ago	📵 💥 Left a message	2018-01-31, 00:00
620 - 660 Control Cont		West Coast Conf Call	My Quotes	\$ Q @ 2	E Konstanting State S	2018-03-09, 09:30
505 - 345 Negotiation/Review 610 - 345 Awaiting Paperwork	30 31	1 2	Quote # Shipping Account	Page 1 2 3 Amount Valid Until Stage	Get More information     the proposed deal	10:45
Hover over a wedge for details.	Left a message			249.38 2017-05-03 DELIVERED	X Discuss Review Proce	ss 2018-03-13, 12:45
Shows cumulative opportunity amounts by selected lead source for selected users.	ails	<b>\$</b> <.\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	2018-40 CEE \$ 1, Endowments LTD 2	695.00 2018-11-10 ON HOLD	Macworld	\$ U.
Last run: 53 minutes ago		Page 1 2 3 ≽		168.54 2018-10-10 DRAFT	iOS 11.3: Power management, bette Animoji, and more	r AR, new ⊘ view
🖬 My Quotes 🌼 🖓 🕲 🖉	Contact	Date ≑ 2018-01-05.	<ul> <li>2018–38</li></ul>	682.24 2018-12-25 DRAFT	Warning: If you turn off iCloud Phot iOS, you may unintentionally delete	
Quote #         Shipping Account         Amount         Valid	(III) Adetaide Charette	16:00 2017-12-27,	<ul> <li>2018–37          MTM \$2, Investment Bank     </li> </ul>	173.94 2018-01-10 DELIVERED	images 5 ways HomePod will beat Amazon Google Home (and 5 ways it won't)	
€ 2017-44	All Greg Sund	16:00 2017-12-17, 16:00	FSB2	Ø &	Pixelmator Pro 1.0 Whirlwind review affordable alternative for pro Photo	
2017-38 Dicome \$ 1,910.16 11/ Free	Edmond Solari	2017-12-16,	Cases by Status by I	User - Total: 20	8bitdo SN30 Pro review: A Super N inspired controller for the PC	intendo- ⊘ view
Investing LP 2						
2017-40 White Cross \$8,076.74 19/ Co 2						
3 2017-37 <u>MISSISSIPPI</u> \$ 1,697.23 11/						

## 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.

Version 1.0, May, 2018. This document is subject to change without notice.

#### Disclaimer

While every effort has been made to ensure the accuracy and completeness of information included in this document, no guarantee is given, or responsibility taken by 1CRM Systems Corp. for errors and omissions.

#### www.1crm.com

Bac	kgrou	nd	.2
1.0	The B	asics of GDPR	.4
	1.1	What is the scope of GDPR?	.4
	1.2	What is a data processor vs. a data controller?	.4
	1.3	What is data processing?	.4
2.0	1CRM	Product Capabilities	.5
	2.1	How has 1CRM adjusted to meet GDPR?	.5
		21.1 Lawfulness of Processing	5
		2.1.2 Data Subject Requests	6
	2.2	What are the specific 1CRM changes?	7
	2.3	What do Administrators need to know?	14
		2.3.1 Data Privacy Module	.14
		2.3.2 List of Values - Type	.14
		2.3.3 Consent fields	.14
		2.3.4 Mark fields as personal information	.14
		2.3.5 Assigning users to DPM	
3.0	Data	Protection in the 1CRM Cloud	15
	3.1	How is personal information protected in the 1CRM cloud?	15
4.0	Data	Controller Responsibilities	16
	4.1	What are the responsibilities of 1CRM customers as data controllers ?	16
	4.2	Lawfulness of processing	16
	4.3	Data Subject Rights	16
	4.4	Organization and Processes	17

## **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
Managing Consent	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.
	Consent can also be withdrawn by the data subject. All changes to consent over time may be tracked in the Data Privacy module.
Opt In Policy	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.
	If an email is set to <i>Opt Out</i> , users can still send business-legitimate emails but should not send send marketing materials.
Data Minimization	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.

#### 2.1.2 Data Subject Requests

Requirement	How 1CRM Handles It
Recording data subject	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.
requests	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.
Right to Access	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.
	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.
Right to Erase	Data subjects can request permanent erasure of some or all of their data. The request is first logged in the Data Privacy module.
	We have added a new role called Data Privacy Manager (DPM). Customers can assign their designated Data Privacy users to this role.
	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.
	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.
	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.
	The existing delete functionality is still available to users. Erasure behaves differently than deletion in that:
	1. Erasure permanently removes the data from the database such that it is not retrievable again.
	2. Erasure can only be performed by users with the DPM role.
	The Change Log records which fields were erased for later reference.
Right to Rectify	Users can correct information using existing functionality. Changes to personal data will be maintained in the Change Log.
Right to Portability	Users can export the personal information from the list view using the Export option and email it to the data subject.
Right to Object to	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.
Processing	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.

### 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.

1CRM System ENT-8.5.0 • 10	CRM Corp. Public Demo (50U)	Q, Search <del>-</del>	🛱 Friday	r May 4, 2018	⊠ 41	ළයි admin
Today's Activities	Sales & Marketing	Order Management	Project Management	Customer Service	Reports & Settings	1 CRM
Data Priva	acy – (new record)					** 0
	Save X Cancel					
	Subject  Created New Lead with Consent Related To Successful Deviation Related To	]				
	Type + Consent to Process Source	•	Status In Progress Source Description	•		
	Web Form		1crm.com site, Fre	e Trial Request Form	4	
	Consent Consent To Process V Description					
	Client checked field to agree to our u purposes re 30-day free trial.	se of their personal data for comm	nunications			
	Save Cancel					

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.

oday's Activities	Sales	a & Marketing On	der Managem	ent	Project Ma	anagement	Cu	stomer Servic	9	Reports & S	ettings	10
	– Data	a Privacy Manager										\$ *
tesults •	-	🕼 Edit 🗈 Duplicate		Print						Created: 0		10
cuts eate Role it Roles	$\langle$	Data Privacy Manag Default role for users allowe	jer d to manage (	personal infor	mation	>					Yesterday, 11: Yesterday, 11:	49
t Roles ams ers		Today's Activities										
ers fault Role			Access	View	List	Edit	Delete	Import	Export	Report	Approve	Personal
/iewed		Calendar	Enabled	All	All	All	AL	AL	AL	All		
ta Privacy Manager		© Chats	Enabled	Al	All	All	All	1	Al	All		
sated New Lead with C skie Perham		Se Email	Enabled	Al	All	All	All		Al	All		
		SI Email Folders	Enabled	Owner	Owner	Owner	Owner		Owner	Owner		
		Email Templates Forum Categories	Enabled	AI AI	All	All Admin	All		All	All Admin		
		Forum Threads	Enabled	All	All	Admin	All		Al	All		
		Forums	Limited	All	All	Admin	Admin		Admin	Admin		
		Neetings	Enabled	All	All	All	All	AI	Al	ILA		
		Resources	Enabled Limited	AI AI	All	All Admin	All	AI	All	All		
		Tasks	Enabled	All	All	Admin	All	AI	All	Admin		$\sim$
		Vacations & Sick days	Enabled	Owner	Owner	Owner	Owner		Owner	Owner	Disabled	$  \rangle \rangle$
				l								$  \rangle$
		Sales & Marketing	Access	View	List	Edit	Delete	Import	Export	Report	Approve	Personal
		C Accounts	Enabled	All	All	All	All	Al	Al	All	Approve	Personal
		Campaigns	Enabled	All	All	All	All	1	All	All	1	
		Contacts	Enabled	All	All	All	All	AI	Al	All	]	All
		Documents	Enabled	All	All	All	All		Al	All		
		Event Types Forecasts	Limited Enabled	All	All	Admin	Admin		Admin	Admin	{	
		Contents (Contents)	Enabled	All	All	All	AI	AI	Al	Ali	j	All
		Marketing Events	Enabled	All	All	All	AI		Al	Al	į	
		Ø Opportunities	Enabled	All	All	All	All	AI	Al	IIA		
		Partners  Target Lists	Enabled	All	All	All	AI		Al	All	{	
		(e) Targets	Enabled	All	All	All	All	AL	Al	All		All
		Order Menseemer									,	
		Order Managemer	Access	View	List	Edit	Delete	Import	Export	Report	Approve	Personal
		S Assemblies	Enabled	Al	All	All	AI		Al	AI		$\setminus$ /
		🗄 Bills	Enabled	All	All	All	All		All	All		$\langle \rangle$
		Z Credit Notes	Enabled	Al	All	All	All		Al	Ali		$\bigcirc$
		% Discounts	Limited Enabled	Al	All	Admin All	Admin		Admin	Admin		
		Models	Enabled	All	All	All	All		All	All		
		Payments	Enabled	All	All	All	AI		Al	All		
		M Price Books	Enabled	All	All	All	All	AI	Al	IIA		
		Product Catalog     Product Categories	Enabled Limited	Al	All	All	All Admin	All Admin	All	All		
		Product Types	Limited	All	All	Admin	Admin	Admin	Admin	Admin		
		Purchase Orders	Enabled	Al	All	All	All		Al	All		
		Quotes	Enabled	All	All	All	Al		Al	All I	Disabled	
		Receiving	Enabled Enabled	AI AI	All	All	AI		Al	Ali		
		<ul> <li>Sales Orders</li> <li>Shipping</li> </ul>	Enabled	All	All	All	AI		Al	All		
		Shipping Providers	Limited	Al	All	Admin	Admin		Admin	Admin		
		🕺 Tax Codes	Limited	Al	All	Admin	Admin		Admin	Admin		
		% Tax Rates	Limited	Al	All	Admin	Admin		Admin	Admin		
		Project Manageme	ent									
			Access	View	List	Edit	Delete	Import	Export	Report	Approve	Personal
		Booked Hours Booking Categories	Enabled Limited	AI AI	Ali	Owner Admin	Owner Admin		All	All	Disabled	
		Booking Categories	Enabled	Owner	Owner	Owner	Owner		Admin	Owner	Disabled	
		121 Human Resources	Enabled	Owner	Owner	Owner	Disabled		Admin	Owner	j	
		🖺 Project Tasks	Enabled	All	All	All	All		Al	All		
		Projects	Enabled	All	All	All	All		All	All	Dischlard	
		( Timesheets	Enabled	Owner	Owner	Owner	Owner		Owner	Owner	Disabled	
		Customer Service										
		St Cases	Access Enabled	View	List	Edit	Delete	Al	All	All	Approve	Personal
		Knowledge Base	Enabled	All	All	All	AI	~	AI	All		
		Recurring Services	Enabled	All	All	All	All		Al	All		
		Releases	Limited	Al	All	Admin	Admin		Admin	Admin		
		Service Contract Types	Limited	Al	All	Admin	Admin		Admin	Admin		
		Service Subcontracts	Enabled	Al	All	All	All		Al	Ali		
		<ul> <li>Software Bugs</li> <li>Software Products</li> </ul>	Enabled Limited	Al	All	All	All		All	All		
			Enabled	Al	All	Admin	Admin		Admin	Admin		
		<ul> <li>Supported Assemblies</li> <li>Supported Products</li> </ul>	Enabled	Al	Ali	All	AI		Al	IIA IIA		
										, A0		
		Reports & Settings		10				1.0			4	
		C Autor 1	Access	View	List	Edit	Delete	Import	Export	Report Admin	Approve	Personal
		🔂 Activity Log	umited				Admin	ļ	Admin	Admin		
		12 Dashboards	Enabled	Team	Team	Owner				Teorin		
<	_	Date Privacy	Enabled Enabled	None	None	None	None		Disabled	Disabled	Disabled	>

Figure 2: Role Changes

3. 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. F	Public Demo (50U)	Q, Search <del>-</del>	🛱 Sa	urday May 5, 2018	⊠ 41	ළයි admin
Today's Activities	Sales & Marketing	Order Management	Project Management	Customer Service	Reports & Settin	gs 1 CRM
🗐 🖗 Leads	– Jackie Perham « 📾 <u>C</u>	reated New Lead wi	th Consent			* × •
List Results •	Edit Duplicate	🕞 Delete 🗎 Print 📚	Convert ¥ View Persona	Data Erase Personal Data	Manage Subscriptions	
Shortcuts  Greate Lead  Create Lead  Create From vCard  Database Import  Last Viewed  Create Viewed	Presi prot \$ +1 ( \$ +1 ( 1 +1 (	ie Perham ☆ Jent /@example.eu )59) 250-2203 work 370) 646-4558 home 125) 741-1777 mobile 🗣 📰 🔛 🖬				esterday, 11:50 esterday, 11:50
<ul> <li>Jackie Perham</li> <li>Data Privacy Manager</li> <li>Created New Lead with C</li> </ul>	Converted Converted Contact					
	Status RECYCLED			Lead Source Trade Show		
	Primary Address 48920 San Carlos Sunnyvale, CA 31687 USA		₩E	Other Address		
	Portal Informatio	n				
	Portal Active			Portal Name		
		Delete Print 🛱	Convert ¥ View Persona	Data Erase Personal Data	Manage Subscriptions	
	Activities					🏘 🗘 🗹
	Compose Email	Schedule Meeting	thedule Call 🔀 Create Task			No results
	E History					<b>\$</b> (U) 🗹
	Ge Create Note or Atta	chment 🕞 Archive Email	<b>View Summary</b>			No results
	Z Marketing Event	S				🏘 🗘 🗹
	Create 🗔 Add E	kisting				No results
	🖪 Campaigns					🏘 🗘 🗹
						No results
	Documents	inting				♦ 00 Z
	Create 🗔 Add E	_				
	Data Privacy Activ	ities •				🍄 🔃 🗹
	Subject	Туре	Source	Status Rela	ated To Date Cro	
	Created New Lead Consent		ess Web Form			day, 12:16

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

Print X Cancel	
ID 8282f3b3-193e-bdd0-15ca-5aecabf059ec	
First Name	Last Name
Jackie	Perham
Title	Email
President	⊠ pro87@example.eu
Other Email	Office Phone & +1 (059) 250-2203
Home Phone	Mobile
% +1 (670) 646-4558	
Salutation	Primary Address Street 48920 San Carlos
Primary Address City	Primary Address State
Sunnyvale	CA
Primary Address Postalcode	Primary Address Country
31687	USA

Figure 4: Personal Data View, With Print Button

	1CRM Systems Corp. • 688	Falkland Road • Victoria, BC V8S 4L5 •	Canada
	Perso	onal Data : Leads	
ID	8282f3b3-193e-bdd0-15ca-5	aecabf059ec	
First Name	Jackie	Last Name	Perham
Title	President	Email	pro87@example.eu
Other Email		Office Phone	+1 (059) 250-2203
Home Phone	+1 (670) 646-4558	Mobile	+1 (425) 741-1777
Other Phone		Skype ID	
Website		Fax Number	
Salutation		Primary Address Street	48920 San Carlos
Primary Address City	Sunnyvale	Primary Address State	CA
Primary Address Postalcode	31687	Primary Address Country	USA
Primary Address State Code		Primary Address Country Code	
Alt Address Street		Alt Address City	
Alt Address State		Alt Address Postalcode	
Alt Address Country		Alternate Address State Code	
Alternate Address Country Code			

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

Check All Fields		
elect Personal Data Fields To Erase		
LBL_MODULE	Current Value	Era
Salutation		0
First Name	Jackie	V
Last Name	Perham	V
Title	President	
Home Phone	% +1 (670) 646-4558	
Mobile	1 +1 (425) 741-1777	
Office Phone	% +1 (059) 250-2203	$\checkmark$
Other Phone		0
Fax Number		0
Skype ID		
Email	☑ pro87@example.eu	V
Other Email		0
Website		
Primary Address Street	48920 San Carlos	V
Primary Address City	Sunnyvale	V
Primary Address State	CA	V
Primary Address Postalcode	31687	V
Primary Address Country	USA	V
Primary Address State Code		
Primary Address Country Code		
Alt Address Street		0
Alt Address City		0
Alt Address State		
Alt Address Postalcode		
Alt Address Country		
Alternate Address State Code		0

Figure 6: Erasing Personal Data

- 4. 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*.
- 5. 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:

1CRM System PRO-8.5.0 • 1CRM Corp.	. Public Demo (Professional Edition)	'5U)	Q Search <del>▼</del>	🛱 Saturday May 5, 2018	⊠ 41	8 <sup>β</sup> admin
Today's Activities	Sales & Marketing	Order Management	Project Management	Customer Service	<b>Reports &amp; Settings</b>	1 CRM
💌 🥜 Studio – Configu	ire Personal Data					* × 🚱
	Select a mod	ule				
	Counts	强 Activity Log	🗄 <u>Bills</u>	Booked Hours		
	Booking Cate	egories 🧭 Campaigns	🗱 <u>Cases</u>	🤛 Chats		
	E Contacts	Z Credit Notes	Dashboards	% Discounts		
	Documents	🖾 Email	🚺 Expense Rep	orts 🚯 Forecasts		
	🔍 <u>Forums</u>	🖄 Human Reso	urces Invoices	Knowledge Base		
	🕅 Leads	Marketing Ev	ents	s 🛤 Partners		
	M Payments	Price Books	Product Cata	log 🖻 Projects		
	E Purchase Or	ders Quotes	Receiving	Recurring Servic	es	
	Reports	Sales Orders	Service Subc	ontracts Shipping		
	M Software Bu	Supported Pr	roducts 🔀 System Bulle	tins 🔒 Timesheets		

Figure 7: Configure Personal Data (Admin Function)

Then mark the Personal Data fields, and Save.

Sales & Marketing	Order Management	Project Management	Customer Service	Repor	ts & Settings
onfigure Personal Data (Co	ontacts)				
✓ Save X Cancel					
This Module Contains Personal Data?					
This screen is used for standard field	s only. Use Custom Fields Edito	or to manage custom fields with pe	rsonal data.		
Select Fields with Personal Data					
Field				Personal Data?	Privacy Consent?
Deleted				0	
Modified by				0	0
Assigned to Created by					
Name				0	0
Primary Account				0	0
B2C Account				0	0
Category				0	0
Business Role				Ø	0
Salutation				Ø	
First Name				8	0
Last Name				Ø	0
Lead Source					
Title Department				Y	
Reports To					0
Birthdate				♥	0
Do Not Call				0	0
Accounting Contact				0	0
phone_homeraw				0	
phone_mobileraw				0	0
phone_workraw				0	0
phone_otherraw phone_faxraw					
Email				8	0
Other Email				Ø	0
Assistant				♥	0
assistant_phoneraw				0	
Email Opt Out					
Email Opt In					
Email Opt-In Date				0	0
Website				Ø	0
Primary Address Street Primary Address City				9	
Primary Address City Primary Address State				9	0
Primary Address Postal Code				Ø	0
Primary Address Country				Ø	0
Primary Address State Code				Ø	
Primary Address Country Code				9	0
Alternate Address Street				8	0
Alternate Address City				Ø	0
Alternate Address State				9	0
Alternate Address Postal Code Alternate Address Country				¥	
Alternate Address State Code				9	0
Alternate Address Country Code				Ø	0
Description				0	0
Portal Name				D	0
Portal Active				0	0
Portal Application				0	0
Invalid Email				0	0
Partner					
Campaign vcard_size					
vcard_size				0	0
vcard_uri				0	0
Consent To Process				0	¥
Live Chat Activity					0
Lead Guerrilla Contact ID				0	
Chat Activity				0	
Personal Information Source					

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*.

Data Type		Field Name	
Text	Y	annual_revenue	
Field Label		Audit Enabled?	
Annual Revenue			
Mass Update?		Merge Duplicates?	
Required Field?			
0			
Personal Data?		Privacy Consent?	
00		0	
Default Value			
Max Size			
25			
Depends On			
•			

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 <u>Technical & Organizational Security Measures</u>.

# 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 <u>reference</u>. 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



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

	1CRM System ENT-8.5.0 • 1CRM Corp. Public Demo (50U)				Q, Search <del>-</del>		🛱 Wednesday January 24, 2018			⊠ 39		88 admin
	Today's Activities		Sales & Marketing	Orc	der Management		Project Management	Custome	r Service		Reports & Settings	1
	📧 🖶 Home Dashb	oard										*
	🚍 Calendar				* 0. = 2	🔊 Opportu	nities Funnel Chart		<b>\$</b> ©.	🔊 My C	Contacts	<b>\$</b> Q
	Day Week	Month 📃 Year					Pipeline tota	al is \$5,145.00K		🕼 Crea	ite	Page 1 2
	•	January 2018	►		Select Date 🔹			Prospectin	9	Nam	ie 🔤	Office Phone
	Activities - & Me -	,	G Calla	Maatiaas Q1	Tasks More (1) V	365		545 Qualificatio		Amt	ber Alsup	% +1 (835) 14
								565 Needs Ana		Cha	asity Aranda	% +1 (791) 91
	Week Mon	Tue	Wed	Thu	Fri	480	-	70 Id. Decisio		Britt	tney Bessey	% +1 (280) 02
		2	3	4	5	4	55 - 395	Perception		🚯 Ran	dal Botsford	% +1 (488) 40
12:26	🗢 🖃	N					500	Proposal/P Negotiation		Bran	ndie Boyster	% +1 (351) 55
= Q m	1 🖂 38-53 m 👹 admin	9	10	11	12		690 - 480	Awaiting P				
		16	17	18	19			Closed Wo	n	🕿 My C	Calls	& Q
Opportunities Fu	nnel Chart 🛛 🌣 🔞						Hover over a	wedge for details.		🕼 Crea	ite	Page 1 2
Pipeline tot	tal is \$5,450.00K	23	24	25	26	Chause		unts by selected lead source		Clos	e Subject	Start Date
	Prospecting		<b>E</b> g 14-16 <b>E</b> g		11-13	Shows cum		unts by selected lead source users.	e for selected	0 ×	West Coast Conf Call	Friday, 1
840	280 Qualification		Explore sale of Sales Replacement	Meeting	Kickoff Meeting			Lastru	un: 7 minutes ago	Θ×	Left a message	2018-0
625 - 5	Value Proposition		Windows		12:30-14:30				in , minutes age			00:00
620 - 660	Perception Analysis				West Coast Conf Call	🖩 My Quote	es		ଢେଓ୍ଡା ଅ	0 ×	Left a message	2018-0 09:30
505 - 380	Proposal/Price Quote	30	31	1	2	Create		Page	1 2 3 ×	0 ×	Get More information	
610 - 345	Awaiting Paperwork	30	2 0-0:30		2	Quote #	Shipping Account	Amount Valid Until	Stage	• ~	the proposed deal	10:45
Hover over a	Closed Won a wedge for details.		Left a message			© 2018-41	C Nelson Inc 2	\$ 1,249.38 2017-05-03		0 ×	Discuss Review Proce	
	incoge for detailor					<ul><li>2010-41</li><li>2018-40</li></ul>	EEE	\$ 1,695.00 2018-11-10				12:45
Shows cumulative opportunity amounts by selected lead source for selected users.						0 2010-40	Endowments	\$ 1,095.00 2018-11-10	ON HOLD	Macwo	orld	
selected lead sou		ails			* Q 10. 17		LTD 2				Power management, bette	AP new
	Last run: 53 minutes ago			Page	1 2 3 *	2018-39	Gifted Holdings AG 2	\$ 3,168.54 2018-10-10	DRAFT	Animoji, a		
My Quotes	✿ Q @ Z		Contact	Dat	• \$	2018-38		\$ 4,682.24 2018-12-25	DRAFT		If you turn off iCloud Phot	
Create	Page 1 2 3 ×		Adelaide Charett		18-01-05,	2 2020 30	2			iOS, you i images	may unintentionally delete	optimized
					:00	3 2018-37	😂 МТМ	\$ 2,173.94 2018-01-10	DELIVERED		omePod will beat Amazon	Echo and
Quote # Shippi Accou	ing Amount Valic		Alana Newby		17-12-27, :00		Investment Bank F S B 2				lome (and 5 ways it won't)	
1 2017-44 😁 RI	VIERA \$ 1,320.42 05/		Greg Sund		17-12-17,						or Pro 1.0 Whirlwind review	
	OTELS 2		an orog ound		:00	🗷 Cases by	Status by User		۵ 🕈		e alternative for pro Photo N30 Pro review: A Super N	shop users
2017-38 Control Inc.			Edmond Solari	20	17-12-16,		Cacoo by Status	by User - Total: 20			controller for the PC	intendo-
Fri	ee vesting LP			16			LASES UN STATUS	Suv user - jouai: 20				
2												
6 2017-40 Co Co	hite Cross \$8,076.74 19/											
	ISSISSIPPI \$ 1,697.23 11											