User Manual

Data Privacy

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Preface

This manual will give you a basic understanding of the way effacts is structured and how this impacts the way you use the entire system. Following this manual in order will allow you to quickly start populating your system with Data Privacy dossiers.

You need to be an Editor or an Administrator to make use of these instructions. Please contact your Effacts Administrator if you do not have a username and password. If you require further assistance with logging in, please contact Effacts Support.
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1 Introduction

In this manual we turn our attention to the Data Privacy theme. The main purpose of this manual is to help you, as a user, with:

- Creating Data Privacy dossiers
- Managing your Data Privacy dossiers
- Adding information to your Data Privacy dossier.
- Collecting information from a Data Privacy dossier into one or multiple reports.
- Making use of alerts when applicable.

From the main Legal Management dashboard, select Data Privacy (figure 1).

![Figure 1: Legal Management dashboard]
Before you can start populating your system, it is important to know that each Data Privacy within Effacts is always based on a 3-layer data model. In order to get an idea of this model, a simplified Entity Relation Diagram (ERD) is presented below. It is important to become familiar with this logic since it will help you to populate your system correctly.

This image below is an example of a relationship model of the information types within the Effacts database (figure 2). Any ‘Dossier’ information type will be directly linked to a Group Company. This links the dossier to the corporate information, which may already be present in your system.

Any dossier will automatically be linked to ‘Documents’, ‘Risks’, ‘Tasks’ and ‘Notes’. All are ‘Content’ information types.

A design is always based on a 3-layer data model: Entities, Dossier and Content.

Figure 2: Entity Relation Diagram

Specific Sub-types may be used to provide a single line in reporting, but allow for separate access and/or entry fields. E.g. a Data Privacy may have subtypes: Data Processes and Data Breaches.
This chapter explains the structure of the theme dashboards. In the Data Privacy theme there are two dossier types: Data Processes and Data Breaches. Your organization can have different roles within these dossier types, for example: Data Controller or Data Processor. This could vary according to your needs.

3.1 Data Privacy Overview dashboard

Selecting the Data Privacy theme from the main Legal Management dashboard will take you to a dashboard which provides you with several useful reports and quick links to keep track of your and your colleagues’ activity.

![Data Privacy Overview dashboard](image)

Figure 3: Dashboard Data Privacy

**Overviews**
Statistics: Each dashboard lets you track active and past dossiers for all parties involved: Group Companies, Departments, Data Controllers, Data Processors, Data applications and Notifying persons.

**Special Reports**
Get a quick overview of all Data breaches with involved parties and agencies, as well as the mitigating measures undertaken and severity.

**Admin Functions**
These functions enable the user to go to the reporting suite to create a custom Data privacy report

3.2 Sub-dashboards: Data Privacy Types

As shown in the Data Privacy overview dashboard, there are two sub-dashboards: Data Processes and Data Breaches (figure 4). Each data privacy dashboard will be explained in paragraphs below.

3.2.1 Sub-dashboard: Data Processes
Part 1:
- The module dashboard contains a blue ‘New’ button, which allows you to start quickly populating the system with information.

Part 2:
- On the left side of the dashboard, you see some standard Status reports. These let you automatically filter Dossiers by status. Clicking one of the buttons will show you the report directly on the right. The colored square next to each Status report is reminiscent of the colors shown in Dossiers.

Part 3:
- Below, you see some standard Overview reports. From here, you can view dossiers and the type of personal information that is related, personal information that is due for removal within 30 days, recently added content, open tasks, and risks.

Part 4:
- If you decide to compose your own report, you can use the custom report buttons as shown here. You may also use the Personal Reporting feature, which is located in the upper-right hand corner.
3.2.2 Sub-dashboard: Data Breaches

**Figure 5**: Sub-dashboard Data Breaches

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**Part 3:**
- Below, you see some standard Overview reports. From here, you can view recently added dossiers, open tasks, and risks.

**Part 4:**
- If you decide to compose your own report, you can use the custom report buttons as shown here. You may also use the Personal Reporting feature, which is located in the upper-right hand corner.
Create and add information

In this chapter you will learn how to build different Data Privacy dossier types. These types will be specifically explained in paragraphs below.

The ability to add a new Data Privacy dossier to your Effacts system is dependent on your level of access. Generally, only Administrators and Editors are allowed to add data to a system. Navigate to the dashboard for the dossier type which you want to create content for. From there, a “New” button will be visible in blue above reports. Clicking the button will forward you to a ‘Create’ screen with some data entry fields. The data entry fields come in a wide variety, from drop-down lists where a user can select pre-determined values, to free text areas to enter data.

A list and explanation of each of these fields can be found below. Fields marked with a red asterisk (*) are required fields, trying to save the input without entering these fields will result in an error message that tells what information is missing.

When the form is filled in, click on the button [Save] to finalize the data and proceed to the created dossier. [Save & New] finalizes the data and creates a new, empty create form. [Save & Copy] finalizes the data and shows an identical, pre-filled create form. Click [Cancel] to cancel the creation of a new dossier.

4.1 Create a Data Process

Navigate to the Data Processes dashboard from the Data Privacy Overview dashboard. On the left side, you see the blue menu item to create content. Clicking it will take you to the following Create form (figure 9):

![Create Data Process Form](image)
Figure 9: Create a Data Process

- **Status**: When creating a new dossier, for instance a data process, the user can now select if the data process should be set as Active or as Draft from the start. These statuses can be changed at a later time. Selecting ‘Draft’ will make the Effective date optional.
- **Editor (list)**: The person who is responsible for filling in this form.
- **Group company**: This a drop-down list of all Group companies previously entered. You can select multiple if needed. To search, simply type the name of the company you are looking for in the search area and click the search button underneath as shown below.
- **Contracts**: related contracts to the data process. This can be selected from a dropdown list with all available contracts
- **Data Controller**: Means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data
- **Data Processor**: Means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller
- **Data Application**: The application itself that’s in use for this process. See below for a more detailed definition.
- **Personal data**: any information relating to an identified or identifiable natural person (‘Data subject’). For example: Bank details, employee ID, full name, passport number etc.
- **Data process**: The process of where 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.
- **Purpose**: Reason that the above process is in place e.g. Financial (invoicing), HR, Marketing
- **Legal Grounds**: Legal Grounds from article 6 GDPR where processing shall be lawful only if and to the extent that an user should select at least one of the underneath.
- **Additional Legal Grounds**: Legal grounds in addition to the legal grounds above from article 6 GDPR.
• Categories of Data subjects: Category of the involved data subject of which personal data is processed. For example: Consumers.
• Categories of Recipients: Recipients can be a natural or legal person, public authority, agency or another body, to which the personal data are disclosed. These can be divided into the following categories: Internal and External.
• Data Controller Representative: A natural or legal person established in the Union who is designated by the Data Controller in writing pursuant to article 27, represents the controller with regard to their respective obligations under this Regulation.
• Data Processor Representative: A natural or legal person established in the Union who is designated by the Data Processor in writing pursuant to article 27, represents the processor with regard to their respective obligations under this Regulation.
• Technical and Organizational measures: Measures to ensure that the personal data are not attributed to an identified or identifiable natural person
• Data transfer outside EEA: A dropdown list with Yes and No to answer the following question: Is data transferred outside of the European Economic Area (EEA)?
• Effective date (date field): Date on which the data process took effect.
• Remarks: A free text area allowing you to add extensive additional information

Data Application
An application that is used to support any operation or set of operations which is performed on personal data or on sets of personal data, 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.

Within the Data Process form, it is possible to search and select an existing Data Application of the applicable process. If you would like to create a new Data Application, click create. The following screen will pop-up (figure 10).

![Create Data Application](figure10.png)

Figure 10: Create a Data Application

- Country / State: Country / State where the business owner of the application is based.
- Name: Name of the Data Application.
- Use case: The use case of the specific Data Application from a business perspective.
- Web Access: Is the application accessible form the web: Yes or No.
Web Access: If the application is accessible form the web, what is the URL?
Authentication: A dropdown list with Authentication measures as: Username and Password, Multi-factor and Single Sign on

4.2 Create a Data Breach

Navigate to the Data Breach dashboard from the Data Privacy Overview dashboard. On the left side, you see the blue menu item to create content. Clicking it will take you to the following Create form (figure 11):

![Figure 11: Create a Data Breach](image)
• Status: When creating a new dossier, for instance a data breach, the user can now select if the data breach should be set as Active or as Draft from the start. These statuses can be changed at a later time. Selecting ‘Draft’ will make the Effective date optional.

• Editor (list): The person who is responsible for filling in this form.

• Group company: This a drop-down list of all Group companies previously entered. You can select multiple if needed. To search, simply type the name of the company you are looking for in the search area and click the search button underneath as shown below.

• Data Protection Officer (DPO): the person that is responsible for overseeing data protection strategy and implementation to ensure compliance with GDPR requirements.

• Data Process: This a drop-down list of all Data Processes previously entered. You can select multiple if needed.

• Notifying Person: The person that have notified the Data Breach.

• Data Application: The application itself that’s in use for this process where the Data Breach occurred.

• Short description: A short description of the Data Breach.

• Severity: Pre-defined drop-down list with Severity categories, for example Not severe, Severe (registration required) and Severe (registration required and need to inform those affected).

• Number of affected people: Number of people that have been affected by the Data Breach.

• Mitigating Measures: Mitigating measures to limit the consequences from the Data Breach.

• Prevention: Preventive measures that ensures this specific Data Breach from occurring again.

• Date of data breach: Date of the specific Data Breach...

• DPA Notified: Is the DPA (Data Protection Act) notified: Yes or No.

• DPA Notification date: If the DPA is notified, what was the notification date?

• Data subjects notified: Are the persons (‘Data Subjects’) that have been affected in the Data Breach notified: Yes or No.

• Data Subjects Notification date: If the Data Subject are notified, what was the notification date

• Effective Date: Date on which the data Breach occurred.
5 Standard Features

You are now able to create a dossier with general information and extra information. In every dossier there are also some standard features available. With this feature you can add extra content to the dossier. This chapter contains an explanation of each feature.

5.1 New Document

This section will give you an explanation about uploading documents to your dossier.

5.1.1 Drag and Drop or mail

Drag and Drop allows you to quickly add one or multiple files (all file types are supported) from your computer to a dossier, as shown in below (figure 12).

![Figure 12: Add documents to a dossier](image)

To drop a document, click and hold the document from your computer and drag it to the box “Drag and drop documents here or mail”. This will start uploading the document(s). The progress of the upload is indicated at the top of the screen.

**NOTE**: It is not possible to drag a file from an email. It needs to be saved on your computer, before you can upload it to Effacts.

**NOTE**: It is possible to add multiple documents to the same dossier or folder. However, we suggest that you limit this to five at a time as not all browsers can handle an amount greater than that.

To mail a document, mail the document from your mail account to the referred mail address in the red box. This will automatically add the document to the dossier.

Once added, the document(s) will appear under the ‘Documents’ tab (figure 13):

![Figure 13: Added document to a dossier](image)
5.1.2 Manually add a document

To manually create a new document, go to the dossier page and click [Add Document] at the right menu of the screen.

Clicking the button will forward you to a ‘Create’ screen which is quite similar in its functionality to other create screens in the system (figure 14). An explanation of each field is given below.

- Dossiers: Pre-defined text containing the agreement to where the document will be created
- Name: name of the document
- Date: Date of when the contract/agreement in the file was signed. (Or upload date of the file attached)
- File: Browse and upload a file to attach it as a document to the contract/agreement

When finished, click on the [Save] button, the newly created document is visible on the Documents tab (figure 15). Or if you want to upload more documents, click [Save & New] or [Save & Copy]. Click [Cancel] to cancel the creation of a new document.

Figure 14: Create a document

Figure 15: Added document to a dossier
5.1.3 PDF preview

If you added some documents to the dossier, it is possible to have a quick look by using the tab PDF preview (figure 16).

Figure 16: PDF pre-viewer

The PDF preview function offers various navigation buttons and tools, each of them are explained below.

- Highlight button: Highlight text in the document
- Typewriter button: add text in the document
- Annotating button: add a note in the document
- Search bar: Search keywords in document
- Multi-page button: Overview of all pages from the document
- Horizontal double arrows: Document in preview page filling horizontal
- Vertical double arrows: Document in preview page filling vertical
- Navigate in document: Navigate to previous or next document
- Switch viewer mode: PDF preview page filling
5.2 New Task

You can find a detailed manual on how to use the new Tasks and Task Workflows here.

It could be that the Workflow manager is disabled for your system. Please contact your consultant or Account manager to Activate this.

5.3 New Note

To create a new note, go to any dossier page and click [Add Note] at the right menu of the screen.

Clicking the button will forward you to a ‘Create’ screen which is quite similar in its functionality to other ‘Create’ screens in the system. An explanation of each field is given below (figure 17).

![Create Note](image)

Figure 17: Create a Note

- Matters: Pre-defined text containing the dossier name to where the note will be created.
- Note: A free text area allowing you to add extensive additional information about the note.

When finished, click on the [Save] button, the newly created note is visible on the ‘Notes’ tab (figure 18). Or if you want to create more notes, click [Save & New] or [Save & Copy]. Click [Cancel] to cancel the creation of a new note. This feature is more commonly used to give status updates about this dossier. That way anyone navigating to this dossier can track its progress.

![Added notes to a dossier](image)

Figure 18: Added notes to a dossier
5.4 New Risk

Risks can be added from every Dossier in the same manner by using the “Add Risk” button in the right-hand panel:

Add Risk

![Create Risk](image)

Figure 19: Create a Risk

- **Dossier:** The Dossier for which the Risk is added. This is filled automatically.
- **Title:** Give the Risk a short, clear title. This will be shown in reports.
- **Risk Type:** Select a category for the Risk. As standard, Risks can be Legal, Financial, or Operational.
- **Assessment Date:** The Date on which the Risk was identified and assessed.
- **Risk Level:** Attribute a Risk level to the Risk. This determines a priority for it.
- **Mitigating Measures:** Write out a descriptive explanation of the mitigating measures undertaken.

Once you are done filling in the form, click “Save” to register the Risk. It will appear in reports throughout the system so users can keep track of them.
5.5 Make Confidential

Each dossier type can be set as confidential for one or more persons by using the button [Make Confidential] at the right menu of the screen. This can be used as a very flexible way of setting some dossiers aside for those who are not allowed to see.

Clicking the button will show you a notification (figure 20). If you decide to invite the persons who need access to this dossier, click the [Submit] button.

![Figure 20: Make a dossier confidential](image)

To invite users, go to the dossier page and click [Invite Users] at the right menu of the screen. Clicking the button will forward you to a screen in which you can select or search a person(s) to invite to this confidential item (figure 21).

![Figure 21: Invite users to view the confidential dossier](image)

Select the persons who may see this dossier.

When finished, click the [Submit] button. The person will receive an invitation automatically by e-mail to view the dossier (figure 22). Clicking the button [View dossier] will redirect the user to the dossier.
A new field, “Confidential” appears on the left side of the factsheet as well as a tab with the Users who have access to this dossier (figure 23).

**Access:**
Only the Editor responsible and the people who are invited to this dossier are able to see it. The responsible Editor is now the one who can manage data for this file or dossier. Therefore, all other invitees can track its progress. The big exception however is the person(s) with the Editor+ Admin role. Users with this role can always see the confidential items and can change the confidential status.

**How to change the confidential status:**
If for some reason one of the users no longer has permission to view the dossier, the responsible Editor can decide to remove the user with access out of the tab (figure 24).

If the dossier needs to be accessible for everyone, the responsible Editor can decide to make this dossier public by clicking [Make Public] at the right menu of the screen.
Clicking this button will display a screen like the picture below (figure 25).

![Make Public](image)

Figure 25: Notification when a confidential dossier is made public

If you are sure about to change the status to public, click the [Submit] button. The dossier can now be viewed by other users. The red confidential text has disappeared.
After reading this chapter you know how to manage a dossier and delete data from your system.

6.1 Change the dossier status

Each dossier data will be managed by the Editor of the dossier. He or she is able to:

- Edit information by using the pencil button. When satisfied with the changes, click [Save] to finalize the update. All reports and screens in the system containing this data will automatically be updated.

- Change the status of the dossier:
  - **Set as draft**: For example, if the effective date of the dossier is unknown.
  - **Make Inactive**: If the dossier can be archived.
  - **Make Active**: If all the necessary information within the dossier is presented.
  - **Mark as cancelled**: If the dossier no longer needs to be in the system.

6.2 Delete information

When you delete information, no history of the subject remains in the system. Keep in mind that archiving information is preferable in most situations. Only delete information when the information itself was added incorrectly or when the information should not be available ever again.

If a user deletes information from the database it will create a ‘hole’ in the database information. At this point we would like to make clear that a back-up of deleted or missing information can cost at least €500.-.

All warnings about deleting information aside, an explanation about how and when deleting information can be carried out is provided below. For example, a wrong contract/ agreement needs to be deleted from the database.

Jump to the factsheet that needs to be deleted and choose [Delete] in the menu at the right.

Only the factsheet will be deleted, all other information will still be available in the database such as the previously linked Group company, Counterparty, Department, Documents, Notes, Risks and Tasks. The Effects system will always ask a user if they are completely sure about deleting the information in a second screen.
7 Standard Reports & Alerts

Aside from the fact that you can easily search for information within the system, it’s also possible to compile important information into one overview, also known as a report. Next to the well-known Custom report button, each dashboard contains a number of standard reports which are available on the left side of your screen.

7.1 Reports

These reports contain valuable information and can be reviewed on the right side of your screen, immediately after clicking one of the buttons. This functionality works very quickly and effortlessly, an explanation of each report is given below.

Status Reports:

Report 1, 2, 3, 4: Active, Draft, Inactive, Cancelled

- An overview of all the Active, Draft, Inactive or Cancelled dossiers within the theme.

Overviews:

Report 1: Added <30 days

- An overview containing all Dossiers added within the last month.

Report 2: Due < 90 days

- An overview containing all Dossiers with an expiration or review date in less than 90 days.

Report 3: Open Tasks

- An overview containing all open tasks related to Dossiers within the theme.

Report 4: Risks

- An overview containing all Risks related to Dossiers within the theme.

Custom Report:

Report 1: Custom Report

- Use this button if you want to create your own report. You can also use the Personal Reporting feature.
7.2 Alerts

One of the powerful functionalities within Effacts is the Alert. Alerts are automatically generated email messages to a predefined group of Users on a predefined alert date. For example, a contract/agreement needs to be reviewed on time, otherwise your contract/agreement will expire. Expiration of the contract/agreement can be avoided by configuring an alert.

The number of times the system sends an alert depends on the configured frequency. For example, a frequency of 30 days means that the system will send an alert to the receivers every month.

A common used Alert is the “Contract with an alert date <90 days” alert. The example below gives you an explanation how it works. All alerts work the same way and the field that triggers them is indicated.

Example:
The contract(s) has to be reviewed on 31/01/2018. The editor will receive the first Alert mail, 90 days before the review date. This means that if the frequency is set to 30 days, the Editor and Business Owner will receive 3 Alert mails. This e-mail contains the contract or contracts that need to be reviewed (figure 26).

How to stop the Alert mail?
If you no longer wish to receive an alert mail, you can stop this notification by simply archiving the contract using the button [Make inactive] (figure 27).

Figure 26: Email with alerts

Figure 27: Make a dossier inactive
Clicking the button [Make Inactive] will forward you to a pop-up screen (figure 28). Here you can set the Inactive as of date. If you click at the button [Submit], the contract will be archived automatically.

Figure 28: Notification when making a dossier inactive