



User Guide

GDPR for Creatio

Dev labs

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Introduction

The **GDPR for Creatio** add-on is designed for implementing software-level compliance of Creatio applications with the General Data Protection Regulation (GDPR). The package contains functions for registering permissions and denials to process personal data from data subjects, such as the customers, and build further interaction with the data subjects based on the existence of the corresponding permission.

Working with personal data

After you install the add-on, a new "Data protection office" workplace will be added. The workplace contains the "Contacts", "Employees" and "Users" sections (these sections store personal data in Creatio by default), as well as the new GDPR section.

The GDPR section is designed for managing permissions from the data subjects for processing their personal data. Permissions are universal for the Leads, Contacts, Employees and Users sections. For example, several leads, a contact, and an employee can use the same personal data processing permission that can be received at any time.

The following information is available in the GDPR section:

- list of all permissions from all data subjects
- origin and terms of each permission
- all linked contact, lead, employee and user records.

Use the "Preference type" lookup to set up types of permissions. The following default types are available:

- "OK to Receive Newsletter" – permission to use personal data for marketing email campaigns.
- "OK to Process" – permission to store and process personal data.
- "Ok to Store PII Data Elsewhere" – permission to store personal data in other geographic regions.
- "OK to terms & conditions" – data subject's consent to privacy terms and conditions.
- "OK to Profile" – data subject's consent to using their personal data for automatic analysis and profiling.
- "OK to track activity" – data subject's consent to tracking their online activity.

The following information is available on the contact page:

- A new "Manage data privacy" field is added. The field is designed for storing links to permissions for working with the contact's personal data. The field is a lookup with records from the "GDPR" section.
- A new "Preferences" tab is added. The tab displays all current permissions for the contact, obtained from different sources. For example, permission may be obtained when a contact fills out a registration form saved as a lead. The tab displays data from the "GDPR" section, connected with the contact by the "Manage data privacy" field.

A new "Manage data privacy" field will be added to the employee page. The field is automatically populated with the data from the "GDPR" section by a connected contact.

The "Do not use email", "Do not use phone", "Do not use SMS", "Do not use fax", "Do not use mail" checkboxes are selected by default for all new contacts.

When the "Manage data privacy" field is populated, the entered value is automatically populated for the corresponding employee as well. As a result, the "GDPR" section

accumulates consolidated information on the contacts, employees, users, and leads. If a new contact with the populated "Manage data privacy" field is saved, Creatio automatically creates a new record in the "GDPR" section and links it with the contact record.

Obtained consent is stored in the form of a record on the "Preferences" detail in the "GDPR" section. Creatio either adds a new record or modifies an existing record by setting the "OK" field to "Yes".

If a contact requests to restrict processing their personal data, the "OK" field of the corresponding record in the "Preferences" detail must be set to "No".

Each permission has a validity term determined by its expiry date. The expiry date is populated automatically when permission is added. The date is calculated by adding the number of days specified in the system setting (code "PermissionDuration") to the date the permission was created on. The default value of the system setting is 180 days.

When a new "OK to Receive Newsletter" permission is added (i.e., the data subject has given consent to receive marketing emails), all "Do not use" checkboxes on the "Communication options" detail of the contact are cleared.

When a new "OK to Process" permission is added (i.e., the data subject has given consent to storing and using their personal data), all "Do not use" checkboxes on the "Communication options" detail of the contact are cleared, except for the "Do not use email" checkbox (marketing emails will not be sent to the contact).

Removing permission automatically denies the use of corresponding communication options.

If the value in the "Manage data privacy" field is deleted from the contact page, all communication restrictions are re-enabled. If the field is populated with a link to a different record in the "GDPR" section, Creatio verifies if the permission for marketing communication exists, and if it does – sets permissions for using corresponding communication options.

Install the BpmLeadGDPR package to enable the GDPR functionality in the "Leads" section.

The BpmLeadGDPR package is used as an add-on to the base BpmGDPR data protection package. After installing the package, the following additional functions for working with leads will become available:

1. A new "Manage data privacy" field will be added to the lead page. The field is designed for storing links to permissions for working with the contact's personal data. The field is a lookup with records from the "GDPR" section.
2. The "Source" field on the lead page becomes required.
3. A new "HasEmailConfirmationProcess" system setting will be added. The setting determines how permissions for email and SMS are created from a lead:
 - If the setting is disabled, and the lead has the "I agree to receive newsletters" checkbox selected, then email permissions will be added when you qualify the lead (i.e., populate contact link on the lead page).
 - If the system setting is enabled, Creatio will not send emails or SMS unless the "Email confirmed" checkbox is selected for a lead. The confirmation process is created separately and is not part of the GDPR add-on.

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- This setting is disabled by default.
4. When a lead is qualified (the contact is linked to a lead), a permissions of the "OK to Process" type and "Yes" value will be created, as well as permission with "OK to Receive Newsletter" type, whose value ("Yes" or "No") will depend on the value of the "I agree to receive newsletters" option in the web form. The web-form that is the source of permission will be recorded as well. This information will be passed to the corresponding contact, where corresponding "Do not use" checkboxes will be selected or cleared automatically on the "Communication options" detail.