Processing activities records

Records of processing activities and breaches allow for keeping records of personal data processing activities, such as defining o persons responsible for personal data administration or specifying data processing category.

The record is available from the level of the tab *CRM → Activity and Breach Records.*

After selecting [**Add**] button a form for entering data related to the scope and character of personal data is opened.

Side panel contains the following fields:

- **ID** – a unique ID of an activity record in the YYYY/MM/DD/ID format
- **Registry Name** – a text field enabling the user to enter a specific record name (optional)
- Basic fields allowing for selecting **persons responsible for personal data administration:** *Controller, Representative* and *Data Protection Officer,* who may be persons selected from the lists of customers/vendors and employees defined in the system. Selecting a customer/vendor/employee from the list displays another list, where it is possible to select address data assigned to a given object.
- *Get Data from Company Stamp* – this parameter is deactivated by default, available under the field *Inspector.* It is only possible to select it if a company name is defined on the form of a center of the *Company* type to which the user is logged on. Selecting the parameter automatically sets the inspector on the basis of a company name and sets the company's address details as inspector details.

Note

Once the *Get Data from Company Stamp* parameter is selected, it is no longer possible to change an activity record's inspector — the relevant field will be grayed out.
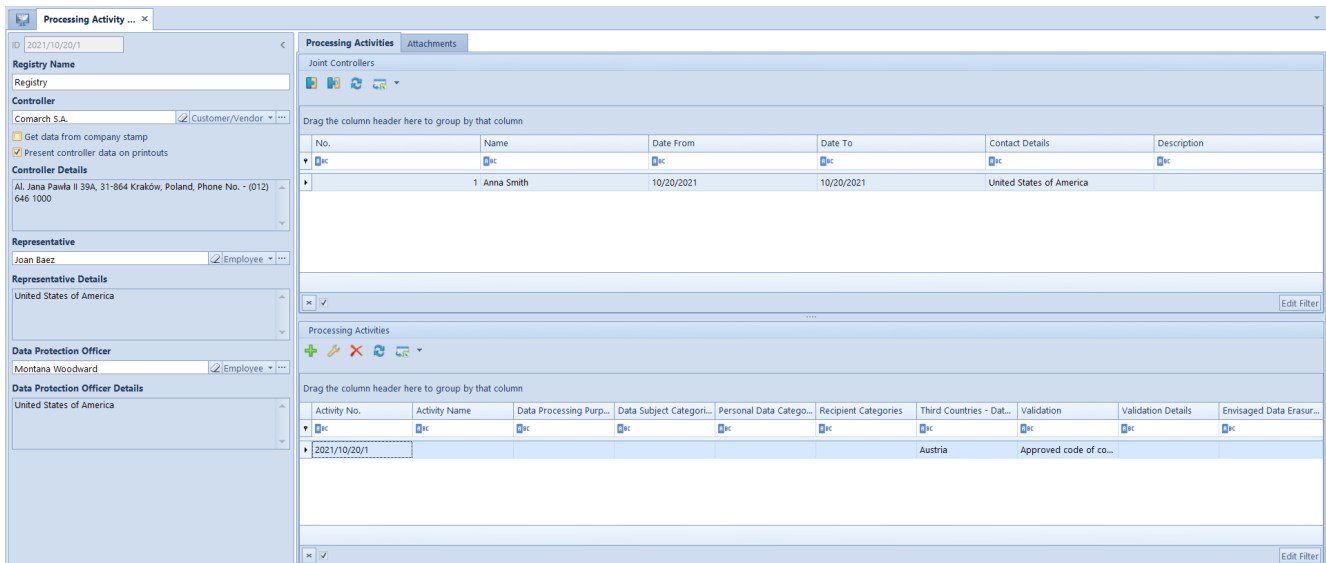
Processing activity record

The tab Processing Activity Records is composed of two sections:

- **Joint Controllers** — it makes it possible to define customers/vendors/employees as the joint controllers of personal data processing. Above the list, there are standard buttons allowing attaching or detaching objects, and exporting them to a spreadsheet. This section presents:
- **Name** of customer/vendor or employee full name
- **Dates From/To** specifying the duration of the joint controller function
- **Contact Details** of a customer/vendor/employee selected by the operator while defining a joint controller
- **Description** — this field enables the user to define additional information about a joint controller

Processing Activities section makes it possible to specify the categories of personal data, data subjects, and recipients, as well as to register the validation of the transfer of personal data, and determine an envisaged date of their erasure.   Selecting the button [**Add**] opens the activity

details form, which contains:

- **Number** — a unique ID number of activities, assigned automatically upon saving
- **Activity Name** — a field texts enabling the user to enter an activity name
- **Data Processing Purpose** — a field text enabling the user to specify the aim of registering a given activity
- **Data Subject/Personal Data/Recipient Categories** — text field limited to 4000 characters
- **Envisaged Data Erasure Dates** — text field limited to 4000 characters

In the tab Third Countries — Data Transmission, moreover, the operator may select countries to which personal data will be transferred and add a relevant validation. One country can be selected only once on a given form.

Processing activity record

The column *Validation* is filled out with values retrieved from the generic directory: *Reasons for Data Transmission* (*Configuration → Generic Directories → Processing Personal Data*). The user can define own values from the level of the directory.

Additional information for validation can be entered also in

Validation Details field.

Breach records

Breaches allows inspector for registering cases of breaches in personal data protection and generate a printout containing information on the registered breach.

Breaches are available from the level of the menu *CRM → Records of processing activities and breaches →* tab *Breaches.* Selecting the button [**Add**] opens a breach details form which is composed of the following sections:

The header contains basic information regarding breach, such us:

- **Protection Officer** – a field opening the list of customers/vendors/employees in the selection mode. By default, a protection officer selected in *Processing activity records* is retrieved. The field is mandatory.
- **Number of records concerned** – a numeric field specifying the number of data records in connection to which a breach has been registered
- **Date of Breach** – the date of a breach in personal data protection; it can be later than neither the notification date, nor the current date
- **Breach reported** – this parameter is deselected by default; once it is selected, the user is enabled to fill in details relevant for the report
- **Notification Date** – a date presented upon selecting the parameter Breach reported; it cannot be later than the date of breach. By default, it retrieves the current

date.

Tab *General* contains text fields, in which the operator can describe breach details, such us:

- *Nature of personal data breach*
- *Category and approximate number of data subjects concerned*
- *Likely consequences of personal data breach*
- *Measures taken/proposed to be taken to address the breach or to mitigate its adverse effects*

Breach form

Additionally, if the parameter *Breach reported* has not been selected, the tab presents another field, *Reason for failure to notify a breach*

Consent withdrawal

To withdraw a registered consent, it is necessary to uncheck parameter *Active* on a selected form.

Consent form is available from the level of the menu *CRM → Consent Records.*

Form of a withdrawn consent

After deactivating a consent, the following fields appear on the form:

- **Withdrawal Date** – field defining the date when a consent has been withdrawn

Note
 The withdrawal date cannot be later than the consent date or the current date.

- **Reason for Withdrawal** – field filled out with values retrieved from a generic directory (*Configuration → Generic Directories → Processing Personal Data → Reason for Withdrawal of Consent*). The operator can add new values to the directory and to define one of them as

the default one.

- Withdrawal Source — values for this field are retrieved from a generic directory (*Configuration → Generic Directories → Processing Personal Data → Source of Consent Withdrawal*). In case there are no values in the directory, the name of the center to which the operator is currently logged-on, is indicated on the form.

Consent batch addition

From the level of the consent record list (*CRM → Consent Records*) and the tab *Consents To Personal Data Processing* available on the forms of:

- *customer/vendor*
- *contact person*
- *employee,*

it is possible to add and withdraw consents for a selected [consent giver](). Selecting the button [**Add In Single Batch**]/[**Withdraw in Single Batch**] opens a window enabling the ergonomic registration of received consents.

Window of batch addition of consent contains the same fields as the consent form.

To add consents in batch, it is necessary to:

- select *Consent Giver*
- check selected *Consent Categories*
- complete associated addresses/contacts, in case for a

given *Consent Wording* option *Refers To Communication Channel* has been checked in the generic directory.

Note
Only those consent categories, to which at least one value has been assigned in the generic directory *Consent Wording,* can be added to the list of consent batch addition.

Consent batch addition

After completing mandatory fields and checking *Create* parameter, [**Generate**] button will be activated. Upon clicking on it, consents presented on the list of consent records will be generated

To withdraw selected consents in batch for a specific consent giver, it is necessary to select the button [**Withdraw in Single Batch**]. A window with all valid consents is open. To withdraw selected consent, it is necessary to check *Withdraw* parameter.

Consent record

Consent record

Consent record allows for managing all consents for processing personal data registered in the system and makes it possible to quickly verify all received consents.

The consent record is available from the level of the menu *CRM → Consent Records.* After selecting [**Add**] button a consent form is opened.

Before adding a consent, first it is necessary to define values of generic directory Consents *(Configuration → Generic Directories → Processing of personal data → Consents).* Consents can be associated with consent categories, selected regulation or related communication channels.

Consent form

To save a new consent, it is necessary to fill in the following fields:

- **Person Giving Consent** — in this field, it is possible to open the list of customers/vendors/employees/contact persons
- **Consent Category** — it is filled out with a value retrieved from a generic directory (*Configuration → Generic Directories → Processing Personal Data → Consent Categories*). The operator can add new values to the directory and to define one of them as the default one.
- **Title** — it is filled out with a value retrieved from a generic directory (*Configuration → Generic Directories → Processing Personal Data → Consents*). The list is narrowed down to consent titles associated with a previously selected consent category, and whose date specified in the field *Effective From* is no later than a current date.

In addition, the following fields are also available on the form:

- **ID** — a unique consent number assigned automatically consent's creation
- **Consent Date** — by default, it is the current date (it cannot be later than the current date), determining the date when a given consent has been entered
- **Source** — a single-choice selection list containing values defined by users in a generic directory (*Configuration → Generic Directories→ Processing Personal Data → Sources of Consent*). By default, the field is filled out with a value specified as default in the directory or, if there is no default value, it is filled out with a center to which the operator is logged on.
- **Related Address** — a single-choice selection list where it is possible to select one of active addresses of a given object. This field remains empty and greyed out if:
    - no value has been entered in the field *Title*
    - the option *Addresses* has not been selected for the parameter *Refers To Communication Channel* in the generic directory *Consents.* The directory is available from the level of *Configuration → Generic Directories → Processing of personal data → Consents.*
- **Related Contact** — a single-choice selection list where it is possible to select active contact details of a given object. This field remains empty and greyed out if:
    - no value has been entered in the field *Title*
    - the option *Contacts* has not been selected for the parameter *Refers To Communication Channel* in the generic directory *Consents*
- **Related Regulations** — this field allows adding an attachment. By default, the field presents the name of an attachment selected in the column *Related Regulations* in the generic directory *Consents.*

Example

During the creation of a loyalty account, client *Store ABC* has sent to the company by e-mail a consent for sending marketing information on e-mail address associated with the account. To register the consent in the system, it is necessary to:

1. Add new value to the generic directory *Consents* (*Configuration → Generic Directories → Processing of personal data → Consents*), for example:

   - **Title:** Receiving of promotional offers
   - **Consent:** Consent for receiving marketing offers through e-mails.
   - **Category:** Marketing
   - **Effective from:** current date
   - **Related Regulation:** none
   - **Refers To Communication Channel:** Yes – Contacts
   - **Related Communication Channels:** e-mail

2. Add new value *"e-mail"* to the generic directory *Sources of Consents*

3. Add new consent form

   - **Consent Giver:** *ABC Store*
   - **Consent Date:** current date
   - **Consent Category:** Marketing
   - **Title:** Receiving of promotional offers (generic directory value defined in point 1)
   - **Source:** e-mail (generic directory value defined in point 2)
   - **Related Address:** none
   - **Related Contact:** e-mail address retrieved from the form of the customer *ABC Store*

After saving the form, the consent will be registered in the system.