

# GDPR

eWay-Book



# Contents

1	Int	ntroduction	2
	1.1	What is GDPR?	2
	1.2	Who and what is GDPR related to	2
	1.3	Basic terms	2
	1.4	Data Subject rights under GDPR	3
	1.5	Marketing messages	3
2	GE	DPR functions activation within eWay-CRM	5
	2.1	GDPR Features	5
	2.2	Activity History Tracking	7
3	Нс	low to record processing consents	8
4	Нс	low to get processing consents	10
	4.1	Preparing user fields in the Marketing module	11
	4.2	Creating and sending a Marketing campaign	12
	4.3	Verifying results	13
5	Rig	ight of personal data access by the data subject	15
	5.1	Save the subject's request	15
	5.2	Process the request	18
	5.3	Save the answer to eWay-CRM	19
6	Right to Rectification		23
	6.1	Save the subject's request	23
	6.2	Process the request	26
	6.3	Save the answer to eWay-CRM	27
7	7 Right to Data Portability		31
	7.1	Save the subject's request	31
	7.2	Process the request	34
	7.3	Save the answer to eWay-CRM	35
8	Right to Restriction of Processing		37
	8.1	Save the subject's request	37
	8.2	Process the request	40
	8.3	Save the answer to eWay-CRM	41
9	Rig	ight to Object	45
	9.1	Save the subject's request	45
	9.2	Process the request and send the answer	48
10	0 Right to Erasure ("Right to be Forgotten")		52
	10.1	Save the subject's request	52
	10.2	Process the request	52
	10.3	Send the confirmation to the Data Subject	53
	10.4	Making sure the subject has really been deleted	53



# 1 Introduction

This guide is designed to be used as a practical set of steps to help you master the GDPR functionality within eWay-CRM®.

Having the GDPR functions implemented within eWay-CRM® does not mean that your company has met all GDPR requirements. The issue is very complex and it concerns various different aspects of your company therefore, we recommend consulting with specialists.

The subject rights described within each chapter's introduction are incomplete. They are meant as introductions to the subject matter, where more detailed information, concerning the functionality can be found.

#### 1.1 What is GDPR?

GDPR, **General Data Protection Regulation** is new legislation introduced in European Union to protect the personal data of individuals; so called Data Subjects.

The aim of the regulation is to distinctly enforce the data protection for European Union Citizens. It becomes enforceable from 25 May 2018 in all member states of the European Union.

#### 1.2 Who and what is GDPR related to

The regulation is related to all subjects processing the personal data of EU citizens. Therefore, it also applies to companies from the USA, Canada, Australia, etc.

#### 1.3 Basic terms

Data Subject	A Data Subject is any individual whose data is somehow being processed.
Controller	It is necessary that a Controller is present at each processing.
	A Controller is any subject, no matter the legal form, who determines the purposes and resources of personal data processing and is the primary person responsible for the processing.
	An individual can also be a Controller, as long as he/she processes the personal data in a way already excluding the application of a personal or home activity exception.
	In case the Data Subject is a company, the responsibility for data processing belongs to the company, not to the owners, official representatives, employees, etc.



Processor	The Processor is an individual or a legal entity, or a public authority, agency etc., processing the personal data for the Controller.
Personal Data	Any information that can lead to identifying the Data Subject is considered personal data. E.g. first name, last name, email, telephone number, IP address, etc. This also includes data that can lead to deducing the Subject's future behaviour (e.g. What more he could possibly desire to buy from me).
Sensitive Data	Any data declaring the Subject's nationality, racial or ethnic origin, political views, membership in trade-unions, religion, philosophical beliefs, conviction of a criminal offense, health condition, sexual life and the genetic data. Biometric data, enabling a direct identification or authentication of the data subject, is also considered sensitive data. It can also be referred to as <i>Sensitive Personal Data</i> in some articles.

# 1.4 Data Subject rights under GDPR

GDPR articles regulate the subject rights in detail, especially:

- 1. Transparent information, communication and modalities for the exercise of the rights of the Data Subject
- 2. Right to be informed (when personal data is collected from the Data Subject)
- 3. Right of access by the Data Subject
- 4. Right to rectification
- 5. Right to erasure (right to be forgotten)
- 6. Right to restriction of processing
- 7. Right to data portability
- 8. Right to object
- 9. Automated individual decision-making, including profiling
- 10. Possibility of Data Subject rights change by EU member states legislative

#### 1.5 Marketing messages

As for the legislation itself, the general rule is that using personal data for the purpose of sending electronic marketing messages to individuals is only possible with consent of the individuals that provide their personal data for this purpose.

The question is in which cases does the sender need consent of the third party whose personal data, (e.g. email, telephone number), he/she is about to use for marketing purposes.



#### 1.5.1 Marketing messages sent without consent

The recital 47 of GDPR determines that processing personal data for the purpose of direct marketing can be considered processing due to a legitimate interest of the Controller. Note that the following rules need to be followed:

- 1. You will use electronic contacts of your customers, related to the sale of my product or service, the data has been gained within the performance of the contract or order. There has to be an easy option for the customer to optout.
- 2. Sending business messages without consent has to be linked directly to the service or product offered within the performance of the contract. So, in case you have sold a car, you cannot offer IT services.

## 1.5.2 Sending marketing messages within business relations

- 1. For sending business messages to business companies via email or telephone, consent is not required, it is appropriate to offer the possibility to *unsubscribe*.
- 2. If the form of the email is firstname.lastname@, or lastname@, then the message should always offer the possibility to *unsubscribe*.

#### 1.5.3 Time limit for keeping subject's data

- 1. The sender always needs to inform the other party for what purpose and for how long consent is given.
- 2. The consents must always be carefully archived, so that in future it is possible to prove when it was given, for how long and for what purpose.

#### 1.5.4 Consent requisites

- 1. The consent has to be an unambiguous confirmation expressing free will of the person giving the consent, it needs to be free, specific, clear, separable and informed.
- 2. The subject giving consent has to give it actively, via signature or ticking a box. Silence or inactivity definitely does not mean a giving free consent.
- 3. The consent also has to be sufficiently informed and the subject asking for permission to send marketing messages should clearly define who it is given to. Either the marketing subject, someone else, or also other subjects; who else will process the consent have it at his disposal.
- 4. For what specific purpose is it being given, specifying the products or services, campaigns etc.
- 5. For how long consent is given for.
- 6. To what personal data is the consent related to, i.e. if only email or also, e.g. telephone contact.
- 7. Instructions about the basic rights.



# 2 GDPR functions activation within eWay-CRM

In order to assist with meeting GDPR requirements, we have prepared two main new features which we recommend to activate.

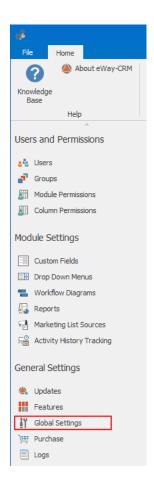
- 1. General set of functions, designated specially for GDPR.
- 2. A function for tracking changes within items (e.g. automatic tracking of who changed the email address on a contact card and when).

#### 2.1 GDPR Features

1. Open Administration Settings.

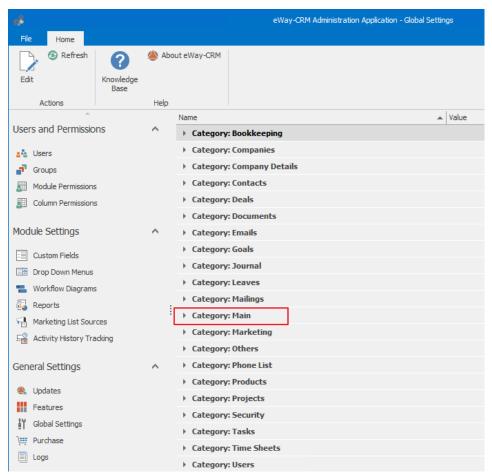


2. Click Global Settings button.

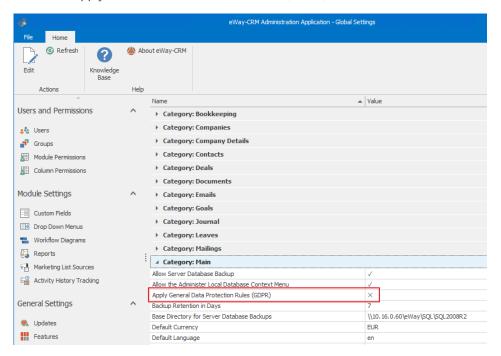




3. Open Main section.



4. Double-click the item Apply General Data Protection Rules (GDPR).





5. Check the box and confirm with OK.



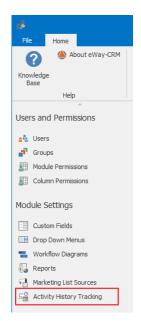
6. eWay-CRM will activate GDPR relevant functions – see this article.

# 2.2 Activity History Tracking

1. Open Administration Settings.

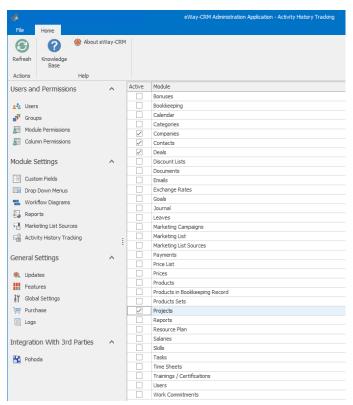


2. Click Activity History Tracking section.





3. Check the modules within which you wish to track history. We recommend activating the function for *Contacts, Companies* and *Deals*. Something not relevant for GDPR, but possibly valuable, is tracking changes within the *Projects* module.



# 3 How to record processing consents

GDPR requires that a personal data processing consent is recorded – a unique record for every processing purpose. That means that the subject might agree that we keep his/her personal data for the purpose of sending educational materials, however, if we haven't got his/her consent for data processing for marketing purposes, we cannot use it for those purposes. Despite the fact that a vast majority of companies will be recording just one consent, we will demonstrate how to use the function universally.

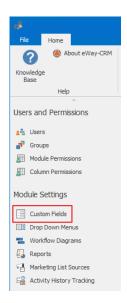
We create a set of fields in eWay-CRM. These fields represent consents received for processing purposes. We can choose classic check boxes or record the date and time. This way we can record "Date Consent Received". The second possibility later allows us to filter those contacts, that gave us consent five years ago (because according to our internal politics, we need to renew the consent after five years, respectively delete the client from our database.)

1. Open Administration Settings.

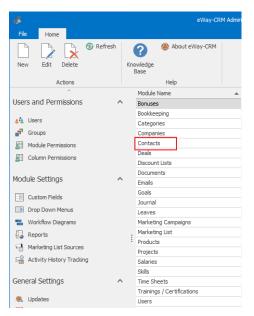




2. Click on the Custom Fields section.



3. Click on the Contacts, Companies or Deals.

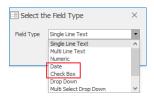


4. In the top left area, click New.





5. Choose the desired type – Date or Check Box.



6. Type the name of the field – e.g. "Date of consent for marketing purposes received", or "Marketing purposes consent" (or any other name according to your preference).



- 7. Click OK.
- 8. Repeat the steps 4-7 for each processing purpose individually.

# 4 How to get processing consents

In order to obtain consents, we will use the *Professional Emails* function, available within the *Marketing* module. Generally speaking, we will send a bulk email requesting for the subjects' consent. The consent will be granted by clicking on a hyperlink sent within the email. If the subject clicks the link, his/her consent will be automatically registered at contact level, in the fields we have created in the last chapter. Meanwhile, a journal note will be created and linked, helping us recognize from which campaign the consent is derived from.

It is advisable that when clicking the hyperlink, the subject receives an auto-response similar to the following, "Thank you for providing consent." We strongly recommend preparing such a lading page on your web site.



Thank you for your trust





# 4.1 Preparing user fields in the Marketing module

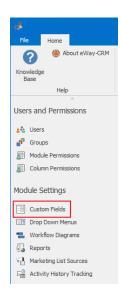
In the chapter *How to register processing consents*, we have learned how to create a set of fields for consents register. Therefore, we have one or more fields defined within the Contact, Company or Deal card.

We shall now create fields within the marketing campaign card.

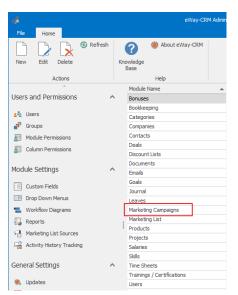
1. Open Administration Settings.



2. Click Custom Fields section.

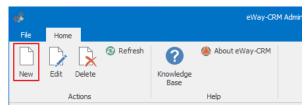


3. Click Marketing Campaigns module.

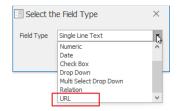




4. In the top left area, click New.



5. Chose type URL.



6. Write down the field name. Please, be very careful and make sure the field name on the *Marketing campaigns* card corresponds to the field name on the card of a *Contact, Company or Deal* only with a "URL - " field name.

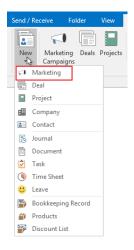
If you have created a field on the Contact card "Date of consent for marketing purposes received" in the last chapter, then name the field "URL - Date of consent for marketing purposes received".



- 7. Press OK.
- 8. Repeat steps 4-6 for each processing purpose individually.

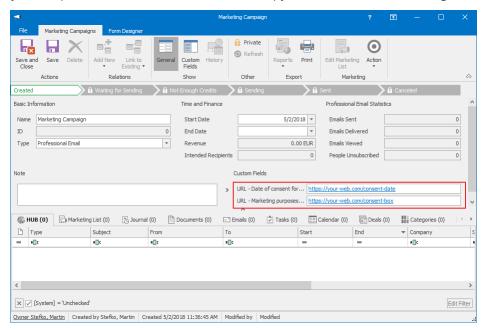
# 4.2 Creating and sending a Marketing campaign

1. In eWay-CRM, click New > Marketing.





2. Insert the resulting website URL the subject will see in case the user clicks on your hyperlink consent, into the new fields "URL – Consent..." Make sure the hyperlink is complete (including http://, OR https://). We recommend you to open the website in a browser and copy the link into the field using Windows box.

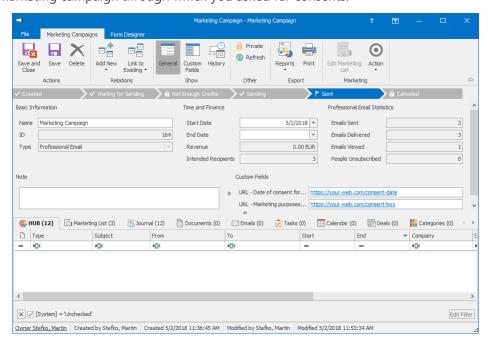


Then process the campaign the way you are used to. Just to make sure, we attach instructions.

# 4.3 Verifying results

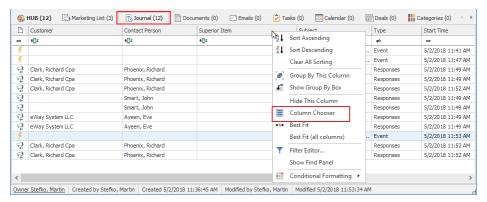
The moment the campaign gets the status Sent, you can start looking for the first consents.

1. Open the marketing campaign through which you asked for consents.

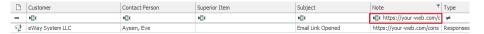




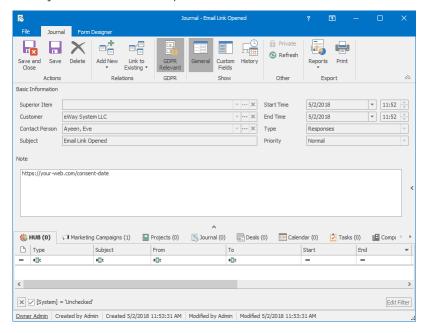
- 2. Click the Journal bookmark.
- 3. Using the Column Chooser, add the Note column to your view.



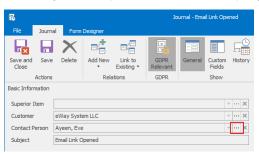
4. Filter all records containing URL of the website subjects will see when they click I agree, in their Note.



5. Double-click one of the journals in order to open it.

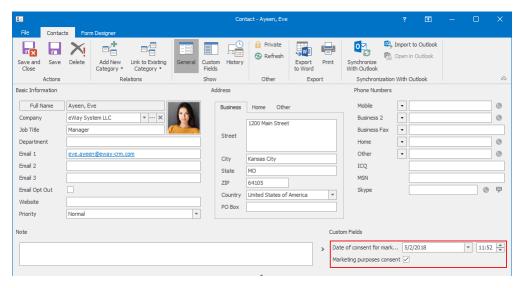


6. By clicking on the icon with three dots, you will open the Contact, Company, or Deal that the journal is linked to.





7. You should see data within the field "Date of consent received..."



8. The journal is, of course, linked to the item, therefore details can be found any time.

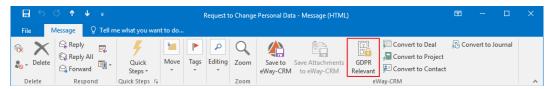
# 5 Right of personal data access by the data subject

According to article 15 of GDPR, every Subject has the right to ask the Controller for what kind of information is recorded and for what purpose.

#### 5.1 Save the subject's request

#### 5.1.1 Sent by email

- 1. Double-click the email.
- 2. In the top toolbar, click *GDPR Relevant*. This way the email will be saved into eWay-CRM as if you use *Save to eWay-CRM*.

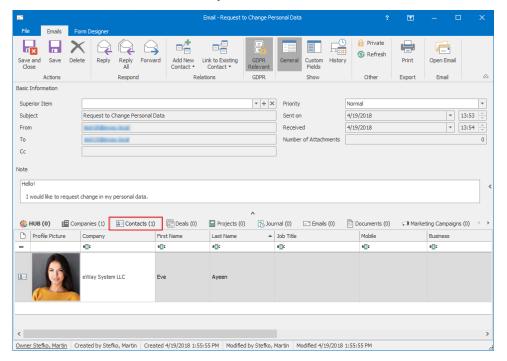


3. When a window pops up, asking whether you want to open the email, click Yes.

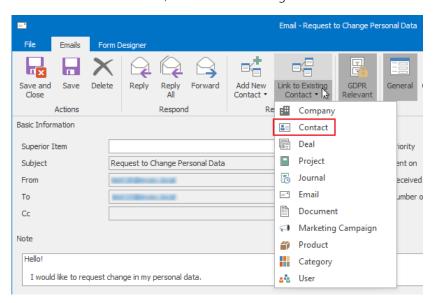




4. Make sure the email is correctly linked to the *Contact, Company or Deal* and that you haven't received the request from an address not listed within eWay-CRM, for instance.



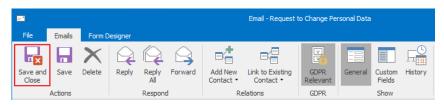
a. If the email isn't linked to a contact, click Link to Existing > Contact and chose the desired person.



b. Of course, in case you want to have your email linked to a contact, click *Link to Existing > Contact* and choose the desired person.

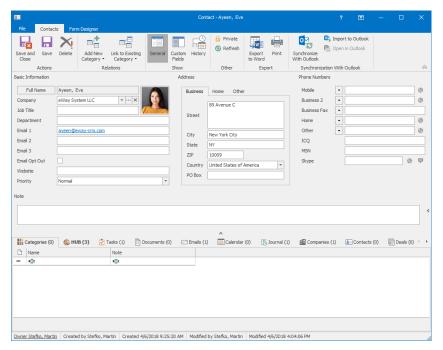


5. Click Save and Close.

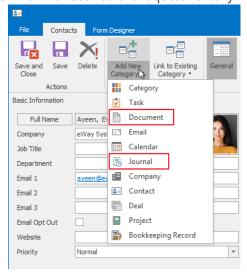


## 5.1.2 Written / Received over telephone

1. Find the Contact, Company or Deal who has submitted the request.

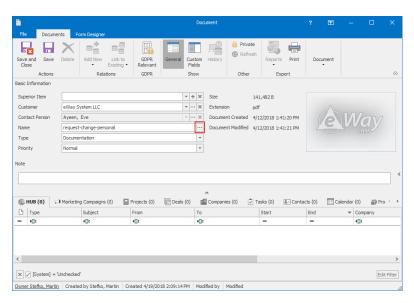


2. Through *Add New > Journal* or *Add New > Document*, create a new item. We use documents when we have a scan of the request. We use journals when we received the request verbally.





3. Fill in the request details and add the scanned document.



4. Click GDPR Relevant. This will help us later with request identification.



5. Click Save and Close.



#### 5.2 Process the request

- 1. Open a card of a Contact, Company or Deal
- 2. Prepare your answer, (written or email), that contains answers to all the questions given by GDPR. At the time when this text is being written, this concern:
  - a. Processing purpose
    - i. Within the user fields Consent for XY purposes, including Date of consent received for XY purposes, (see chapter "How to record processing consents" where you will find the information about which purposes is the consent related to.
  - b. Category of touched personal data
    - i. The individual contact fields will help to establish what type of information you record about the subject. For instance: first name and surname, telephone number, email address, etc.



- c. Processing receivers
  - i. According to your company's privacy policy, (probably necessary to consult with an IT Administrator), you will find out who in your company has the access to eWay-CRM® data.
- d. The planned period of time for keeping the data
  - i. See your internal data protection guideline.
- e. Consent resources information
  - i. Within the HUB bookmark, filter only the *GDPR relevant* items. Here you shall find all the important data which is *GDPR relevant* concerning the chosen subject. Therefore, you should have all the consents concisely noted here as well.
- f. Automated individual decision-making, including profiling
  - i. See your internal data protection guideline.
- g. The subject's rights to delete or rectify, the right to object and to file a complaint with a Supervisory Authority.

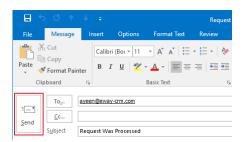
Don't forget that you probably keep the subject's data in different software too. Of course, you have to delete it from there manually.

## 5.3 Save the answer to eWay-CRM

#### 5.3.1 Sent by email

#### Automatic email tracking is active

1. Write your email and click Send.



2. A window will pop-up, asking whether you want to save your email to eWay-CRM.

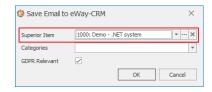


3. Check GDPR Relevant field.





4. You can choose a Superior Item.



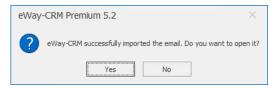
5. Press OK.

#### Automatic email tracking is inactive

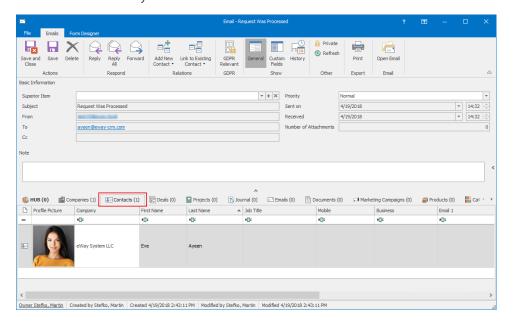
- 1. Double-click the email in Sent Mail.
- 2. Click Save to eWay-CRM in the top toolbar.



3. When a window pops-up, asking whether you want to open the email, click Yes.

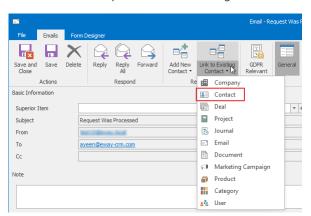


4. Make sure the email has been correctly linked to a Contact. Company or Deal and that the request hasn't been sent from an address not in eWay-CRM.

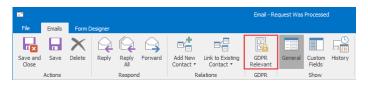




a. If the email isn't linked to a Contact, press Link to Existing > Contact and choose the appropriate person.



- b. Of course, in case you need your email linked to a Deal or a Project, follow similar steps.
- 5. On the email card, click GDPR Relevant in the toolbar. That will help us later with request identification.

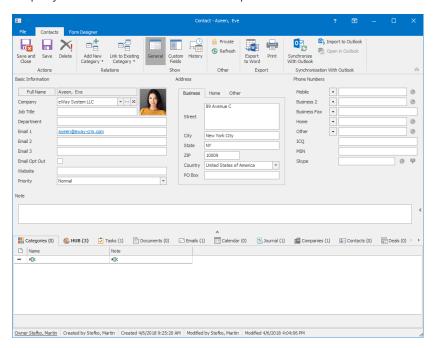


6. Click Save and close.



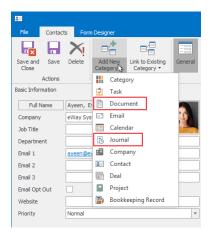
#### 5.3.2 Written / Telephone

1. Find a Contact, Company or Deal who submitted the request.

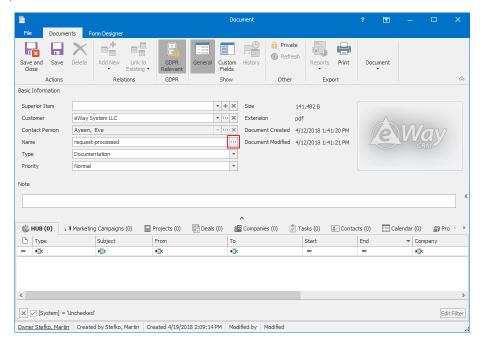




1. Through *Add New > Journal* or *Add New > Document*, create a new item. We use documents when we have a scan of the request. We use journals when we received the request verbally.



2. Fill in the request details and add the scanned document.



3. Click GDPR Relevant. That will help us later with request identification.



4. Click Save and Close.





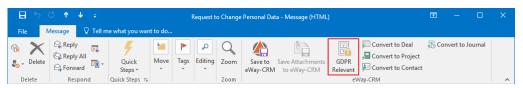
# 6 Right to Rectification

According to article 16, GDPR, subject has the right to rectification, eventually adjustment of personal data, without any unnecessary postponing.

## 6.1 Save the subject's request

#### 6.1.1 Sent by email

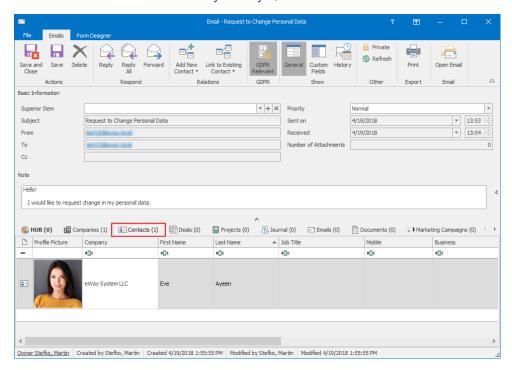
- 1. Open the email by double-clicking it.
- 2. Click on *GDPR Relevant* within the top toolbar. This way the email will be saved into eWay-CRM just as if you use *Save to eWay-CRM*.



3. When a window pops-up, asking whether you want to open the email, click Yes.

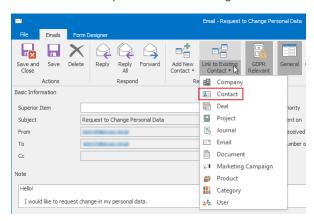


4. Make sure the email has been correctly linked to a contact (eventually a deal or a project) and that the request hasn't been sent from an address not in eWay-CRM yet, for instance.





a. If the email isn't linked to a contact, press Link to Existing > Contact and choose the appropriate person.

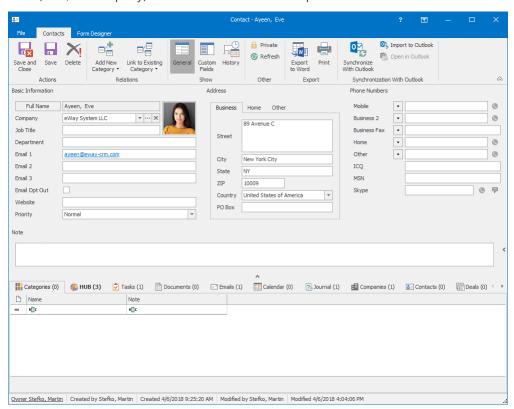


- a. Of course, in case you need your email linked to a deal or a project, follow similar steps.
- 5. Click Save and Close.



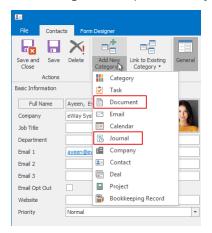
#### 6.1.2 Written / Received over telephone

1. Find a contact (deal, or company) who has submitted the request.

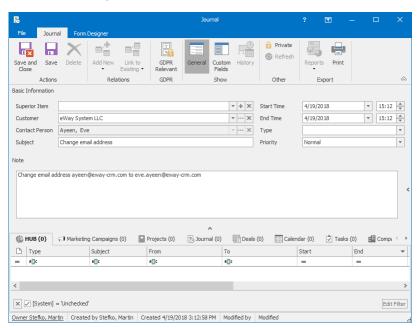




2. Through *Add New > Journal* or *Add New > Document*, create a new item. We use documents when we have a scan of the request. We use journals when we got the request verbally.



3. Fill in the request details, eventually add the scanned document.



4. Click GDPR Relevant. That will help us later with a better request identification.



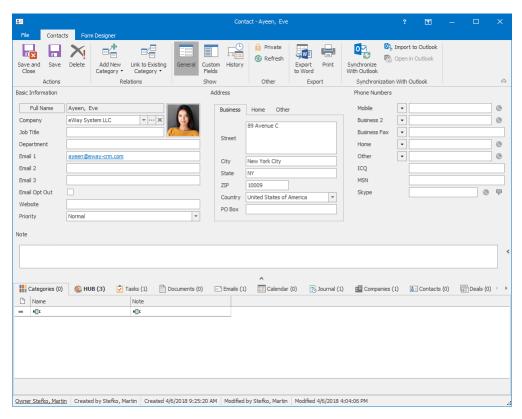
5. Click Save and Close.



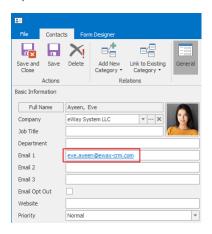


# 6.2 Process the request

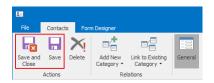
1. Open the contact card.



2. Change the information within the requested fields.



3. Press Save or Save and Close.





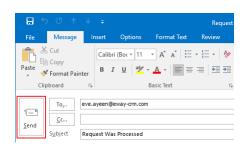
By clicking the History button within the toolbar on a contact card, you may find thorough records about the change being done. Therefore, it is easy to find out who and when changed what. The Activity History Tracking feature is available in eWay-CRM 5.2 and it has to be activated before.

## 6.3 Save the answer to eWay-CRM

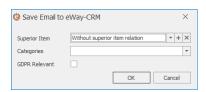
#### 6.3.1 Sent by email

#### Automatic email tracking is active

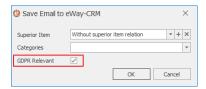
1. Write your email and click Send.



2. A window will pop up, asking whether you want to save your email to eWay-CRM.



3. Check GDPR Relevant field.



4. You can choose a Superior Item.



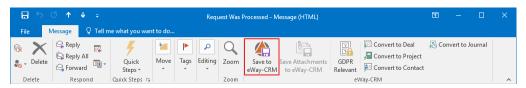
5. Press OK.

#### Automatic email tracking is inactive

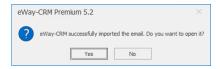
1. Double-click the email in Sent Mail.



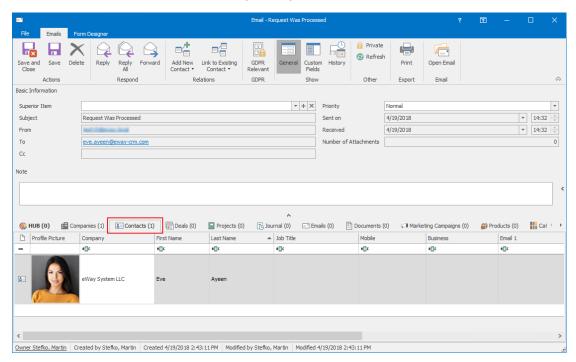
2. Click Save to eWay-CRM in the top toolbar.



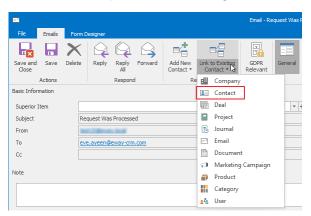
3. When a window pops-up, asking whether you want to open the email, click Yes.



4. Make sure the email has been correctly linked to a contact (eventually a deal or a project) and that the request hasn't been sent from an address not in eWay-CRM yet, for instance.



a. If the email isn't linked to a contact, press Link to Existing > Contact and choose the desired person.

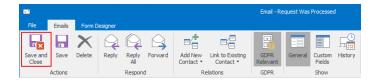




- b. Of course, in case you need your email linked to a deal or a project, follow similar steps.
- 5. On the email card, click GDPR Relevant in the toolbar. That will help us later with a better request identification.

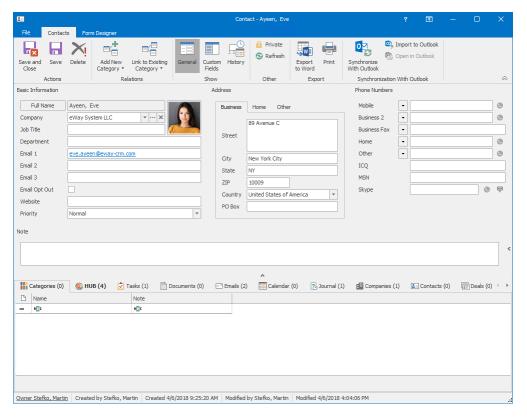


6. Click Save and Close.



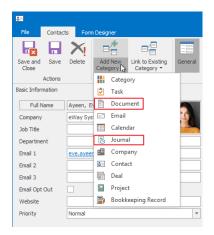
## 6.3.2 Written / Telephone

1. Find a contact (deal, or company) who submitted the request.

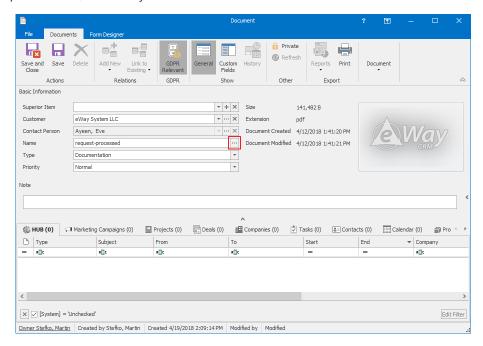




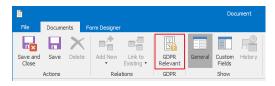
2. Through *Add New > Journal* or *Add New > Document*, create a new item. We use documents when we have a scan of the request. We use journals when we got the request verbally.



3. Fill in the request details, eventually add the scanned document.



4. Click GDPR Relevant. That will help us later with a better request identification.



5. Click Save and Close.





# 7 Right to Data Portability

Article 20, GDPR, specifies the subject's right to data portability, by data meaning those he has given the administrator. That is in a structured, commonly used and machine-readable format. We shall use Microsoft Excel for this purpose.

## 7.1 Save the subject's request

#### 7.1.1 Sent by email

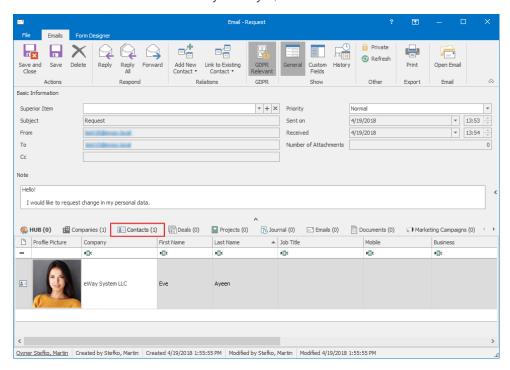
- 1. Double-click the email in order to open it.
- 2. Click on *GDPR Relevant* within the top toolbar. This way the email will be saved into eWay-CRM just as if you use *Save to eWay-CRM*.



3. When a window pops-up, asking whether you want to open the email, click Yes.

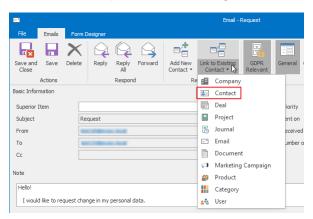


4. Make sure the email has been correctly linked to a contact (eventually a deal or a project) and that the request hasn't been sent from an address not in eWay-CRM yet, for instance.

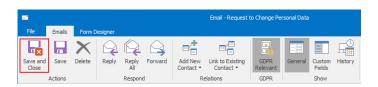




a. If the email isn't linked to a contact, press Link to Existing > Contact and choose the desired person.

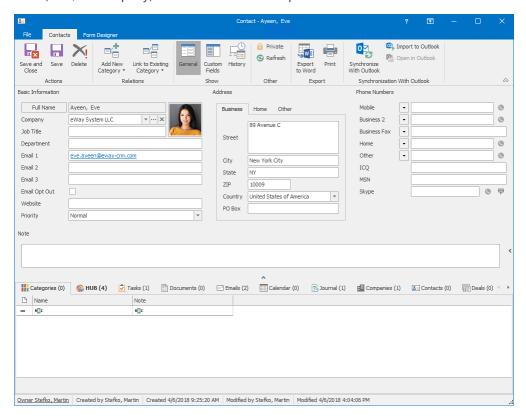


- a. Of course, in case you need your email linked to a deal or a project, follow similar steps.
- 5. Click Save and Close.



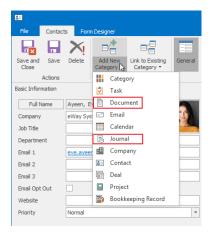
#### 7.1.2 Written / Received over telephone

1. Find a contact (deal, or company) who submitted the request.

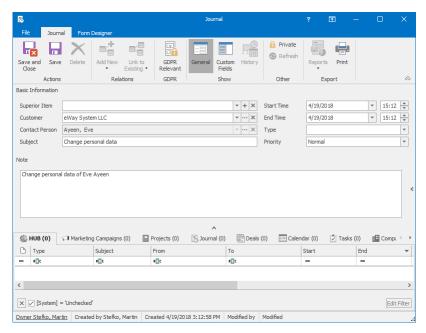




2. Through *Add New > Journal* or *Add New > Document*, create a new item. We use documents when we have a scan of the request. We use journals when we got the request verbally.



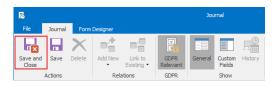
3. Fill in the request details, eventually add the scanned document.



4. Click GDPR Relevant. That will help us later with a better request identification.



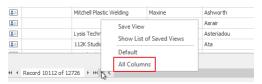
5. Click Save and Close.





## 7.2 Process the request

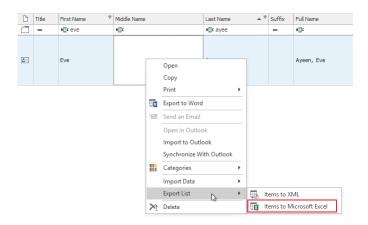
1. In the list of contacts (or deals or companies), click *User Views* and choose *All Columns*.



2. Find the desired subject through Quick Searching.



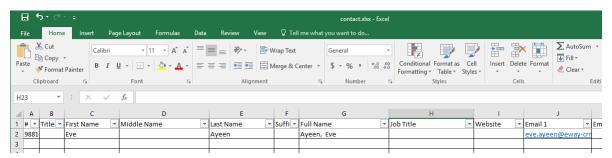
3. Right-click the subject and choose *Export List* > Items to *Microsoft Excel*. All the visible items from the list will be exported. Therefore, you need to make sure only the searched subject is visible before the export.



4. Reply Yes to the question whether you want to open the file.



5. Go through the file, eventually deleting data not compliant with this subject's right.



6. Save the file.

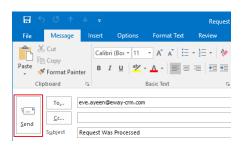


# 7.3 Save the answer to eWay-CRM

In this case, we will send the answer through email (as an attachment, or in the form of a hyperlink leading to files download).

#### Automatic email tracking is active

1. Write your email and click Send.



2. A window will pop-up, asking whether you want to save your email to eWay-CRM.



3. Check GDPR Relevant field.



4. You can choose a Superior Item.



5. Press OK.

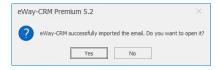
#### Automatic email tracking is inactive

- 1. Double-click the email in Sent Mail.
- 2. Click Save to eWay-CRM in the top toolbar.

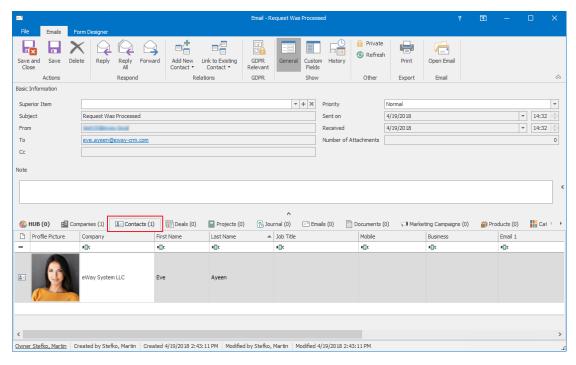




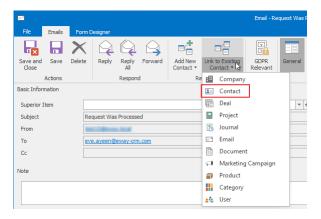
3. When a window pops up, asking whether you want to open the email, click Yes.



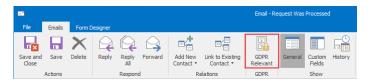
4. Make sure the email has been correctly linked to a contact (eventually a deal or a project) and that the request hasn't been sent from an address not in eWay-CRM yet, for instance.



a. If the email isn't linked to a contact, press Link to Existing > Contact and choose the appropriate person.

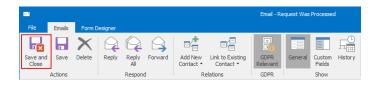


- b. Of course, in case you need your email linked to a deal or a project, follow similar steps.
- 5. On the email card, click GDPR Relevant in the toolbar. That will help us later with a better request identification.





6. Click Save and Close.



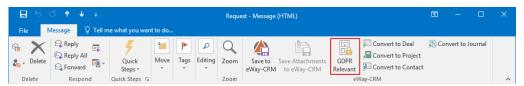
# 8 Right to Restriction of Processing

Subjects can ask the Controllers to limit the processing purpose of their personal data, according to article 18, GDPR. For instance, they may opt-out from the marketing news subscription, but they still wish to stay listed among other databases.

# 8.1 Save the subject's request

#### 8.1.1 Sent by email

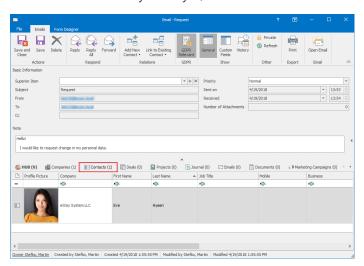
- 1. Double-click the email in order to open it.
- 2. Click on *GDPR Relevant* within the top toolbar. This way the email will be saved into eWay-CRM just as if you use *Save to eWay-CRM*.



3. When a window pops-up, asking whether you want to open the email, click Yes.

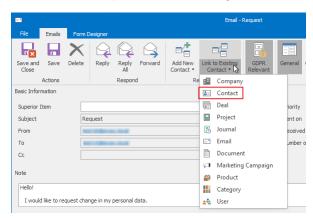


4. Make sure the email has been correctly linked to a contact (eventually a deal or a project) and that the request hasn't been sent from an address not in eWay-CRM yet, for instance.

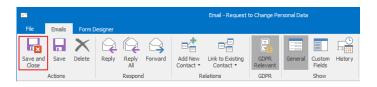




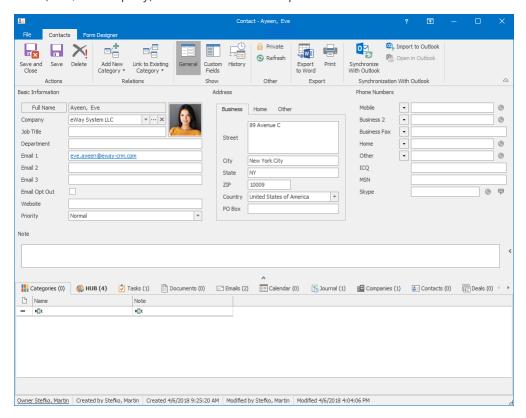
a. If the email isn't linked to a contact, press Link to Existing > Contact and choose the desired person.



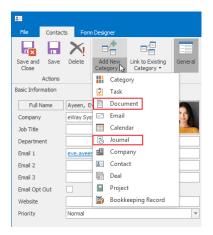
- b. Of course, in case you need your email linked to a deal or a project, follow similar steps.
- 5. Click Save and Close.



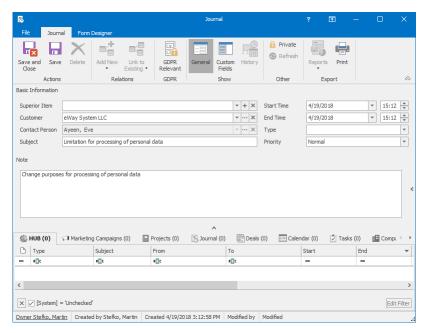
## 8.1.2 Written / Received over telephone







3. Fill in the request details, eventually add the scanned document.



4. Click GDPR Relevant. That will help us later with a better request identification.

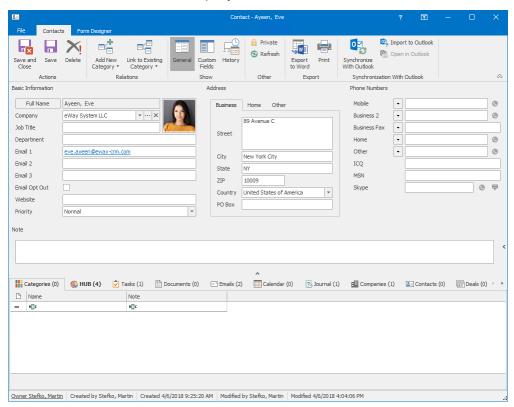




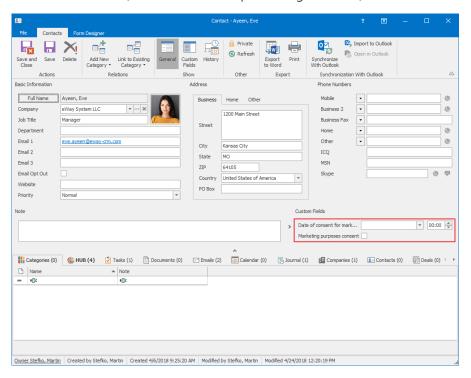


# 8.2 Process the request

1. Open the card of a contact (or deal, or company).



2. Delete the consent receiving information – *Consent for marketing causes*, respectively *Date of marketing purposes consent received* field (see How to record processing consents).





3. Click Save or Save and Close.



By clicking *History* in the main toolbar of a contact card, you will find a record of the change. That way, anyone can find out who and when deleted the data within the field – that is, when you lost consent.



Also, you can find the client's request marked as GDPR Relevant within the HUB, with that day and time.



## 8.3 Save the answer to eWay-CRM

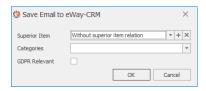
### 8.3.1 Sent by email

### Automatic email tracking is active

1. Write your email and click Send.

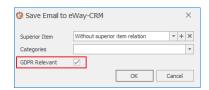


2. A window will pop-up, asking whether you want to save your email to eWay-CRM.

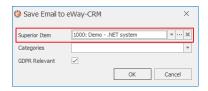




3. Check GDPR Relevant field.



4. You may choose a Superior Item.



5. Press OK.

#### Automatic email tracking is inactive

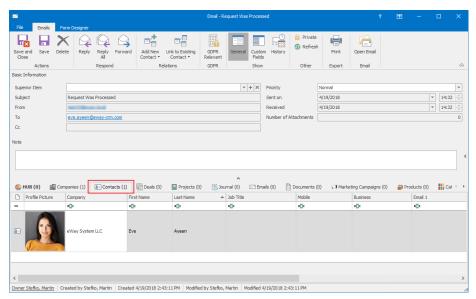
- 1. Double-click the email in Sent Mail.
- 2. Click Save to eWay-CRM in the top toolbar.



3. When a window pops up, asking whether you want to open the email, click Yes.

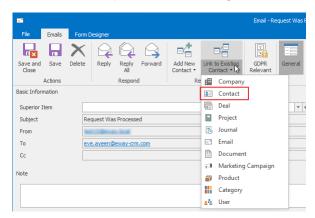


4. Make sure the email has been correctly linked to a contact (eventually a deal or a project) and that the request hasn't been sent from an address not in eWay-CRM yet, for instance.

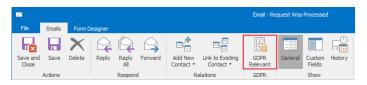




a. If the email isn't linked to a contact, press Link to Existing > Contact and choose the desired person.



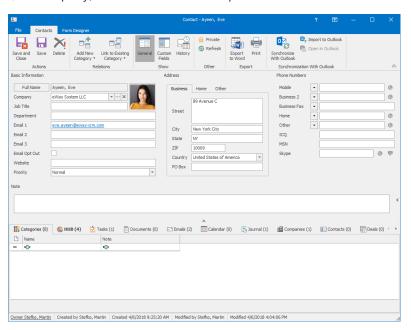
- b. Of course, in case you need your email linked to a deal or a project, follow similar steps.
- 5. Click GDPR Relevant. That will help us later with a better request identification.



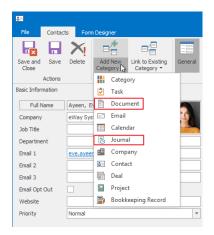
6. Click Save and Close.



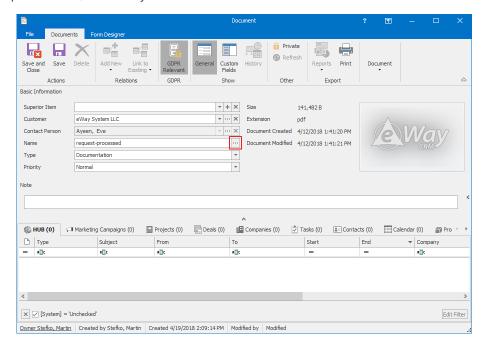
### 8.3.2 Written / Telephone







3. Fill in the request details, eventually add the scanned document.



4. Click GDPR Relevant. That will help us later with a better request identification.







# 9 Right to Object

Article 21, GDPR, gives subject the right to object against personal data processing. The Controller does not process the data unless he is able to show serious, authorised reasons for processing.

## 9.1 Save the subject's request

### 9.1.1 Sent by email

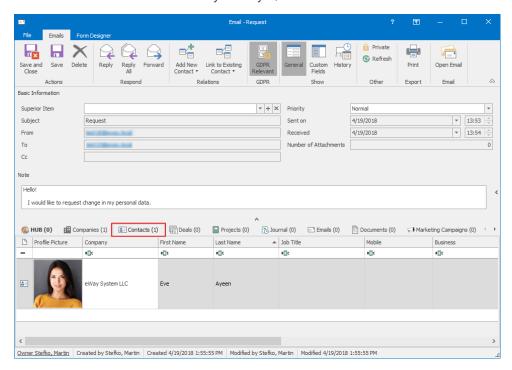
- 1. Double-click the email.
- 2. Click on *GDPR Relevant* within the top toolbar. This way the email will be saved into eWay-CRM just as if you use *Save to eWay-CRM*.



3. When a window pops-up, asking whether you want to open the email, click Yes.

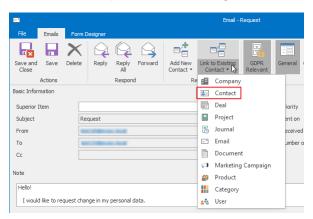


4. Make sure the email has been correctly linked to a contact (eventually a deal or a project) and that the request hasn't been sent from an address not in eWay-CRM yet, for instance.

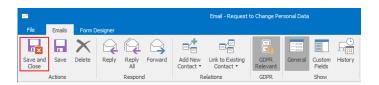




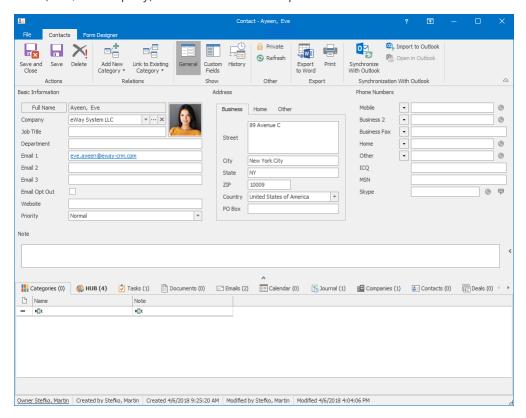
a. If the email isn't linked to a contact, press Link to Existing > Contact and choose the desired person.



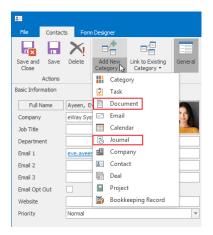
- b. Of course, in case you need your email linked to a deal or a project, follow similar steps.
- 5. Click Save and Close.



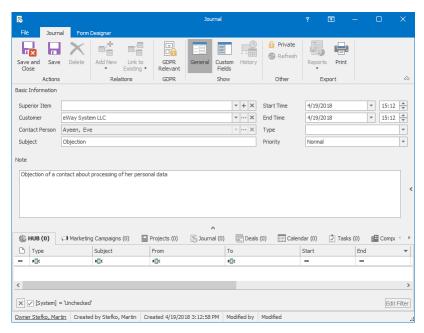
## 9.1.2 Written / Received over telephone





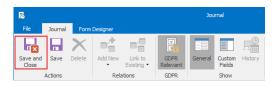


3. Fill in the request details, eventually add the scanned document.



4. Click GDPR Relevant. That will help us later with a better request identification.







# 9.2 Process the request and send the answer

- 1. Deal with the objection according to your personal data protection guideline.
- 2. Then sent your answer using one of the following ways.

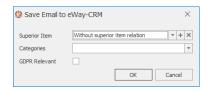
### **9.2.1 By Email**

#### Automatic email tracking is active

1. Write your email and click Send.



2. A window will pop-up, asking whether you want to save your email to eWay-CRM.



3. Check GDPR Relevant field.



4. You may choose a Superior Item.



5. Press OK.

# Automatic email tracking is inactive

- 1. Double-click the email in Sent Mail in order to open it.
- 2. Click Save to eWay-CRM in the top toolbar.

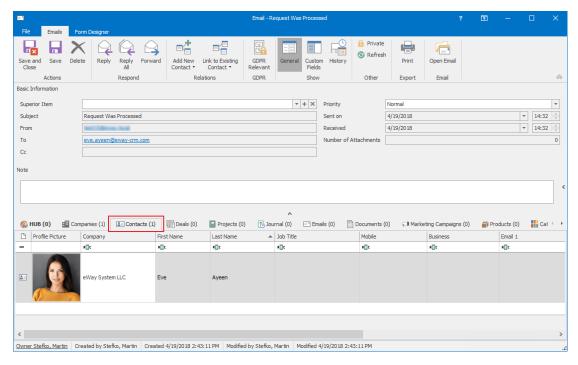




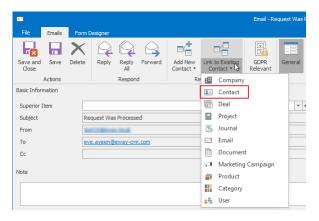
3. When a window pops up, asking whether you want to open the email, click Yes.



4. Make sure the email has been correctly linked to a contact (eventually a deal or a project) and that the request hasn't been sent from an address not in eWay-CRM yet, for instance.



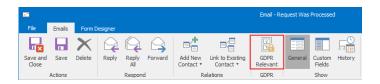
a. If the email isn't linked to a contact, press Link to Existing > Contact and choose the desired person.



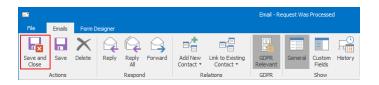
b. Of course, in case you need your email linked to a deal or a project, follow similar steps.



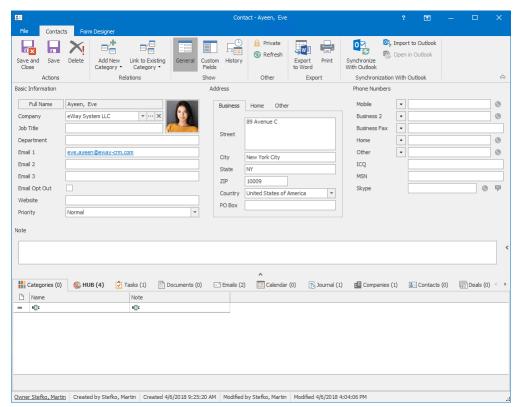
5. Click *GDPR Relevant* within the toolbar on the email card. That will help us later with a better request identification.



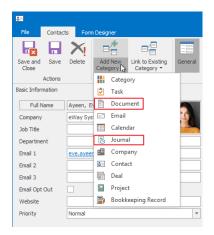
6. Click Save and Close.



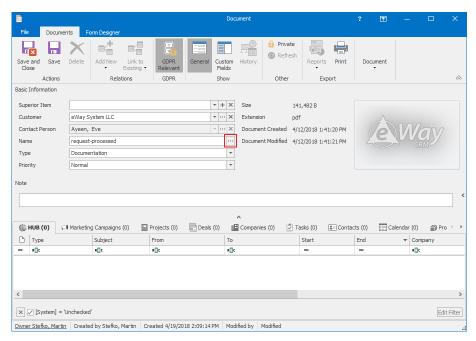
## 9.2.2 Written / Telephone







3. Fill in the request details, eventually add the scanned document.



4. Click GDPR Relevant. That will help us later with a better request identification.







# 10 Right to Erasure ("Right to be Forgotten")

According to article 17, GDPR, subject has the right to have any personal data related to him erased by the Controller, without any unnecessary postponing.

If the GDPR function is activated within eWay-CRM® (see GDPR functions activations in eWay-CRM), then by deleting the record also the complete history of subject relations will be deleted. That means we will delete all journals, emails, documents, tasks, calendars and marketing records.

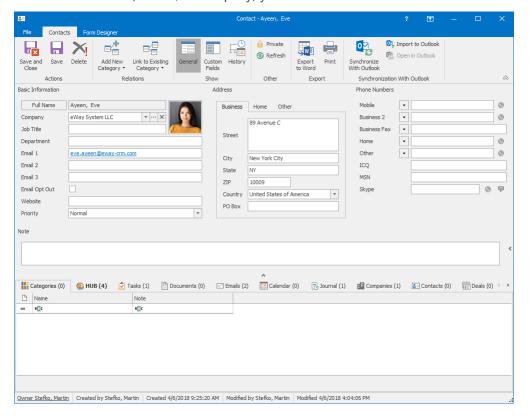
This operation is irreversible.

## 10.1 Save the subject's request

- 1. Record the request according to your privacy policy. As for the fact that all items linked to the subject will be deleted as well, eWay-CRM is not the right place.
- 2. If you want to record the request within eWay-CRM anyway, follow similar steps as in the previous chapters. However, make sure the request is not linked to a contact / company / deal you want to delete. Eventually delete the linkage.

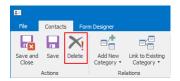
## 10.2 Process the request

1. Open the card of the contact (or deal, or company) you want to delete.





2. Notice that the *Delete* button has a different icon. Apart from the black cross, there is a little red exclamation mark. Click it.



3. The items erasure inquiry has several new security elements:



- a. An icon for clear differentiation of a "different type of erasure".
- b. The inquiry contains multiple explanations that the joined items will be erased irreversibly (if there are any). This means all journals, documents, emails, tasks and calendars. The contact will also be deleted from all marketing campaign lists. In case the contact is linked to deals, projects or companies, these won't be deleted.
- c. Captcha should make the users think about whether he really wants to delete the record.

Think again whether you wish to delete this record – the action cannot be taken back. If the answer is yes, rewrite the captcha and confirm with the *Yes* button.

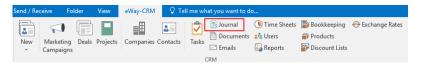
The record has been deleted irreversibly. A journal will be created about the record erasure process, containing an encoded information about all text fields of the erased subject. We use the SHA-256 algorithm. It is a one-way encoding algorithm which doesn't allow to later find out what data has been encoded. However, we are always able to encode the string wanted using the same algorithm and then compare the resulting data. That gives us the answer on whether we have previously kept records related to the subject – see Making sure the subject has really been erased.

# 10.3 Send the confirmation to the Data Subject

- 1. At this point as well, you will probably save the request confirmation elsewhere than into eWay-CRM.
- 2. If you want to record the request within eWay-CRM anyway, follow similar steps as in the previous chapters. However, as the Contact (or Company, or Deal) does not exist within eWay-CRM anymore, you will not be able to use the function for automatic Sent mail tracking.

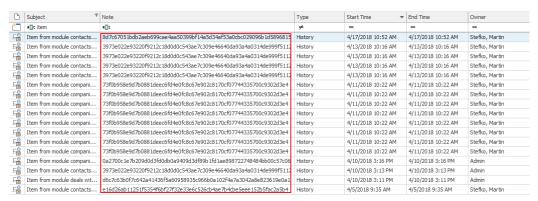
#### 10.4 Making sure the subject has really been deleted

1. In Microsoft Outlook, click the *Journal* button in the main eWay-CRM toolbar.





2. Make sure the column Note is visible. If it isn't, add it using Custom chooser.



- 3. Go to <a href="https://passwordsgenerator.net/sha256-hash-generator">https://passwordsgenerator.net/sha256-hash-generator</a> and generate an SHA-256 text hash according to which you want to search e.g. email address. You can search using any text column of the erased record desired (first name, surname, email, telephone number, etc.)
- 4. <u>Search</u> for the resulting SHA-256 hash among the *Note* field. You will see an erasure record, where you can find who and when erased the record.

