

GDPR Update for Autoline Revision 8

**Information for customers on
versions 9090 to 9304B**

April 2018

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1 General Information

This communication details the functionality that is specifically available to customers on versions 9090 through to 9304B that will assist them with their GDPR compliance. The details contained in this document related to the specific GDPR areas highlighted supersedes the information that has been sent out in prior GDPR communications from CDK.

This document covers five specific GDPR areas:

- Consent
- Right to be Forgotten
- Right to Rectification
- Right to Access
- Right of Portability

Each of the above sections consists of two sub-sections:

1. Regulation Information table, containing:
 - Summary of the requirements of the regulation
 - The specific regulation and any relevant GDPR articles or recitals
2. Functionality available
 - Details of the functionality available and any workarounds required

2 Consent management

2.1 Regulation information

Requirement	Relates to
Processing a data subject's personal data should be only where there is a lawful basis for such processing (e.g. consent, contract, legal obligation)	The Lawfulness of Processing (see GDPR Article 6(1) and Recitals 39-50)
Under the Data Protection Act (DPA), Individuals have the right to 'block' or suppress processing of personal data. The restriction of processing under GDPR is similar. When processing is restricted, you are permitted to store the personal data, but not further process it. You can retain just enough information about the individual to ensure that the restriction is respected in future.	The Right to Restrict Processing (see GDPR Articles 18, 19 and Recital 67)
Individuals have the right to object to: <ul style="list-style-type: none"> • Processing based on legitimate interests • Direct marketing At which point you must no longer process their personal data unless you can demonstrate legitimate grounds for continuing to do so.	The Right to Object (see GDPR Articles 12, 21 and Recitals 69-70)

2.2 Functionality available

For Autoline Revision 8, versions 9090 to 9304B, the new automated consent management tools to assist with both the existing PECR and forthcoming GDPR regulations are not compatible.

Using existing functionality, consent can be managed for limited channels within the DMS – primarily postal, phone, fax and email activity. This will vary dependent on the version of Autoline Revision 8 in use.

Additionally, it is not possible to produce a consent agreement statement from within the DMS. This will need to be managed via a manual process.

3 Right to be forgotten

3.1 Regulation information

Requirement	Relates to
Enabling an individual to have the deletion or removal of their personal data where there is no compelling reason for its continued processing.	The Principles relating to Processing of Personal Data (see GDPR Article 5 and Recital 39)
	The Right to Erasure (see GDPR Articles 17, 19 and Recitals 65 and 66)

3.2 Functionality available

To delete a customer record, on the Customer tab within CRM, you can set the customer status to 'X - Marked for deletion'. This allows the customer record be removed from the system via a batch deletion process, unless it is still required for legal or contractual reasons.

The screenshot shows the CRM interface for a customer record. The 'Status' dropdown menu is open, and the option 'X - Marked for deletion' is highlighted with a green arrow. The interface includes a menu bar (File, Reports, Tools, Customer options, Contact details, Help), a toolbar with icons for various actions, and a sidebar with navigation options (My CRM, Company, Customer, Vehicle). The main content area displays customer details such as Title/Initials, First name, Surname, Address, and Postcode.

Customer record view for version 9090 onwards

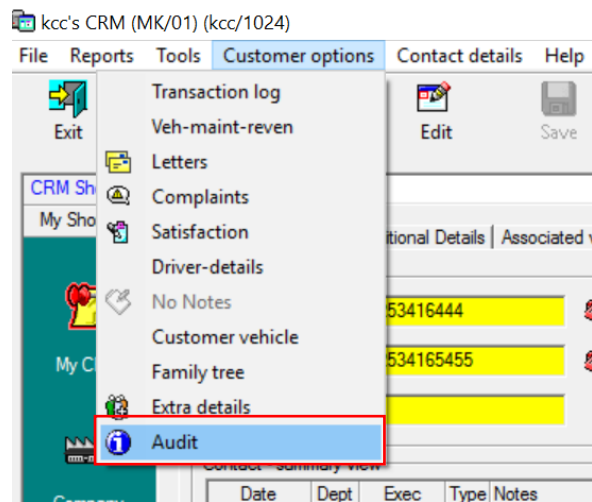
4 Right to rectification

4.1 Regulation information

Requirement	Relates to
Individuals are entitled to have personal data rectified if it is inaccurate or incomplete. If you have disclosed the personal data in question to third parties, you must inform them of the rectification where possible. You must also inform the individuals about the third parties to whom the data has been disclosed where appropriate.	Right to Rectification (see GDPR Article 16)

4.2 Functionality available

Personal data is easily accessible and can be updated by any authorised user. You will need to verify within your version of Autoline if you have the below *Audit* option enabled, which will capture all rectifications made to a customer record as an audit trail:



Audit Button

If this option is switched on, you will be able to access an audit trail, as shown the example below:

View database audit file

Filters: Module: MK Table: target User: Company: 01 Column: Dates: Search Clear Direction: FORWARDS Key path: MOD/COMP/TABLE/COL

N.B. Filter items in [brackets] are audit controlled

Record key: Record added Field amended Record deleted

Mod	Co	Table	Column	Occ	Date	Time	Original value	New value	Record details	User
MK	01	target	ADDRESS	1	12/10/2017	10:13:11	Rua Pinheiro Manso -	New street Nº 123 Andar 55	"MAGIC" = 3	kcc
MK	01	target	ADDRESS	2	12/10/2017	10:13:11	Nº 123 Andar 3	From a new location	"MAGIC" = 3	kcc
MK	01	target	FIRSTNAM	12/10/2017	10:13:10		Manuela Correia	Abcd	"MAGIC" = 3	kcc
MK	01	target	FIRSTNAM	13/10/2017	10:47:04		Abcd	Customer	"MAGIC" = 3	kcc
MK	01	target	OSURNAME	12/10/2017	10:13:11		Something	Something	"MAGIC" = 3	kcc
MK	01	target	OSURNAME	13/10/2017	10:47:04		Something		"MAGIC" = 3	kcc
MK	01	target	PHONE	1	12/10/2017	10:13:11	225341654	2253416444	"MAGIC" = 3	kcc
MK	01	target	PHONE	2	12/10/2017	10:13:11	225341654	22534165455	"MAGIC" = 3	kcc
MK	01	target	POSTCODE	12/10/2017	10:13:11		4100-413	4100	"MAGIC" = 3	kcc
MK	01	target	SEX	10/10/2017	20:11:05			F	"MAGIC" = 3	kcc
MK	01	target	SUFFIX	10/10/2017	20:11:05			123456789	"MAGIC" = 3	kcc
MK	01	target	SURNAME	12/10/2017	10:13:11		Silva	12345	"MAGIC" = 3	kcc
MK	01	target	SURNAME	13/10/2017	10:47:04		12345	Name	"MAGIC" = 3	kcc

Example of audit trail

If you cannot see this option within Autoline, you will need to enable the feature. This can be switched on with the following steps:

System utilities > Management menu > Database auditing > Audit control > Module MK, Company, Table target > Create

Database audit control

Module: MK [Marketing] Company: 01 [Company 01] Table: target Customer records

N.B. Items in [brackets] have database audit control records on file

Available columns to add from dictionary:

Short name	Description
MAGIC	Customer number
COMMAGIC	Company magic number
STATUS	Record status
CREATED	Date created
EDITED	Date last edited
TITLE	Title
INITIALS	Initials
FIRSTNAM	First name
SURNAME	Surname
SALUTE	Salutation
SHORT	Short name
EXEC	Contact executive
PHONE	Telephone numbers
ADDRESS	Address
POSTCODE	Postcode
TARGETYPE	Customer type

Column list to be audited:

Short name	Description
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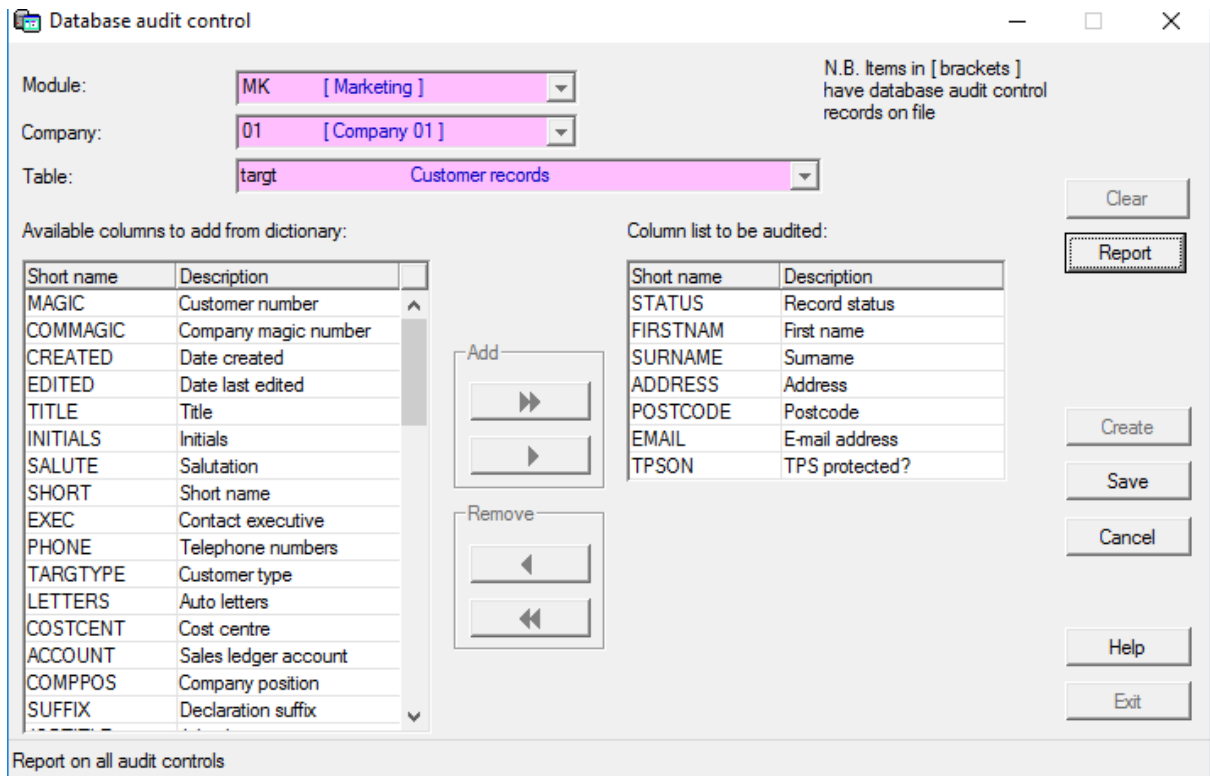
Buttons: Add, Remove, Clear, Report, Create, Save, Cancel, Help, Exit

Refreshes the drop down lists and updates with brackets [] if items are audit controlled

Database audit screen

Select and Add (using the arrow) the required fields from the Available columns on the left to the Columns to be audited on the right. Recommended fields could be Title, Surname, Address, Postcode, Email, Status, TPS flags, etc. Then, press 'Save'

Once this has been enabled, you will be able to access the audit trail.



Database audit screen with desired audit fields selected

Finally, to activate the Audit button option, go to:

CRM > System Maintenance > User access control > Load the relevant user > Amend > Available buttons tab > drop down > Customer functions > Select Audit > Save

5 Right to access

5.1 Regulation information

Requirement	Relates to
You must be able to provide a data subject, upon request, with: <ul style="list-style-type: none"> • Confirmation their data is being processed • Access to their personal data • Any other supplementary information 	The Right of Access (see GDPR Articles 12, 15 and Recital 63)

5.2 Functionality available

You will need to use a manual process, supported by your Privacy Policy, to inform customers of how their data is being processed.

6 Right of portability

6.1 Regulation information

Requirement	Relates to
Provide a data subject, upon request, with a copy of the personal data stored on them, allowing them to move, copy, or transfer personal data easily from one IT environment (and Data Controller) to another in a safe and secure way, without hindrance to usability.	Right to Data Portability (see GDPR Articles 12, 2 and Recital 68)

6.2 Functionality available

The report KG1 “Export customer details” will provide the functionality to produce this report. This will be available ahead of the GDPR readiness deadline of 25th May 2018.

This will be accessed via either:

CRM > Reports & Enquiries > Report generator > Run report generator

or

CRM > Reports & Enquiries > GDPR reports menu