

DevMan and GDPR

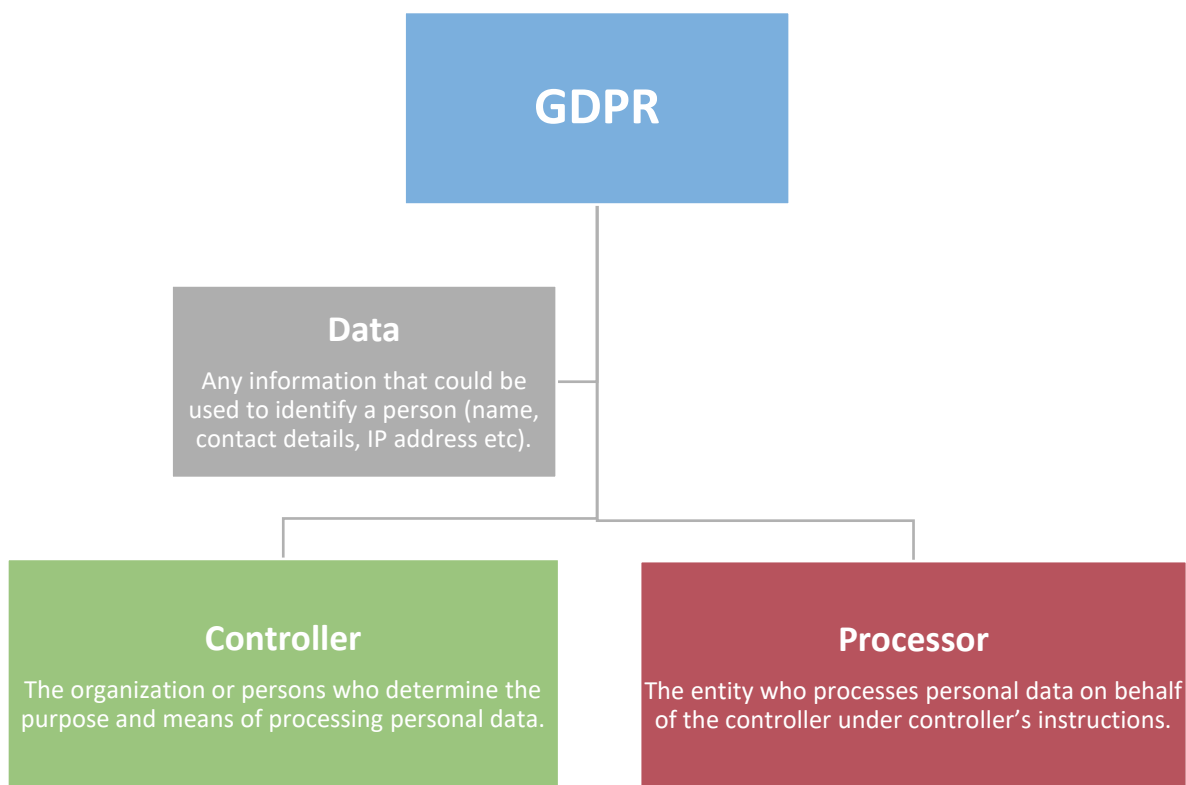
Many companies have recently updated their privacy and other legal documents in response to a new law that went into effect on 25 May 2018 called GDPR.

What is GDPR? General data protection regulation (GDPR) is a new European law that will change the way we use and store personal data. Although it's in effect in Europe it does affect us in South Africa. GDPR and POPI are designed to give everyone control of our own personal data.

You the client, in the capacity of data owner and data processor are responsible for this information, the processing of it, and how it will be used as defined in the GDPR (<https://gdpr-info.eu/>).

DevMan as a CRM database service provider acts as a sub-processor and aim to help you comply with GDPR. We process personal data according to services agreed, in line with your instructions and your responsibility.

What is required? All data owners / processors must be able to clearly show responsibility and compliance.



We have researched the subject and found some very helpful guidelines which we have listed below. All information provided is merely an interpretation of the ruling, we strongly recommend you also do your own research to ensure compliance. This may necessitate some changes to your own privacy and other legal policies and alerting your data subjects of these changes.

GDPR compliance guidelines

The GDPR allows the everyday person to take control of what data various entities may store / use about them.

1. Understand and organise all data

Fully understand why you collect and keep data and store all the data in an organized way.

- If asked what information you have on a person you need to access this quickly.
- If ever investigated, you need to ensure you know what data you have on person.

2. Do not keep or collect data unnecessarily

GDPR states you can't keep or collect data if you don't have a legitimate need or know what you are going to do with it.

3. Ensure data is safely stored

- Write down your risk assessment and what safety measures you have in place to prevent a breach and how to manage a breach*.

4. Write up a fair processing policy in everyday terms (Privacy policy)

- This explains in layman's terms what you will be collecting and how you will use it.
- Ensure data subject have clear access to this policy.
- When you put this together or revise your current policy, consider:
 - i. Gathering – What, Who, How & Why
 - ii. Usage – How it will be used and with whom
 - iii. Effect – Will the person concerned be affected, object or evoke complaint

5. Have a procedure to quickly gather and provide all data on persons*

- The data subject is entitled to requested what data you have on them.
- This information must be supplied within one month, free of charge.

6. Procedure to remove data

Have a process to completely erase all person's data if requested*.

7. Allow for positive 'Opt in'

Allow people to positively 'opt in' to you having and using their data.

- Data subjects have the right to positively 'opt in' – 'yes you can have my data, and you can use my data'.
- They should have to actively tick a box, it should not be defaulted to yes*.

8. Provide simple 'Opt out'

Make it easy to opt out of marketing communications whether received by SMS or email.

- Strictly ensure the data subject will not receive further marketing communications from you*.

9. Inform your team

Ensure your entire team knows and observes GDPR requirements*.

10. Data Protection Officer (DPO)

A Data Protection Officer assists your business with internal compliance and act as a contact point for data subjects and the Information Commission Office (ICO).

*You need to show these documented policies and processes if ever investigated.

How DevMan helps you comply

- DevMan provides the means to have accurate data in one place (i.e. not multiple spreadsheets with varying degrees of accuracy / completeness).
- Quick search functionality to immediately find and access data held on any person or entity.
- Easily draw / extract data profile from DevMan.
- We endeavour to follow industry standard best practice for security (see DevMan technical information document).
- DevMan subscriptions allow data subjects to opt in or out of receiving marketing communications.
- The DevMan team has been made aware of GDPR requirements.
- Mervyn Kydd has been appointed as the DPO for IS Kidz Africa.