GDPR - RIGHT TO BE FORGOTTEN ADD-ON

Brainwave Identity GRC

Abstract
bw_gdpr_anonymisation add-on user guide

Brainwave GRC
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1.1.   Context

This document describes how to install and use the "GDPR - Right to be Forgotten" add-on that allows to anonymise your data in your Brainwave iGRC database.

This add-on is available for download in the Brainwave GRC Marketplace website using the following URL:
https://marketplace.brainwavegrc.com/package/bw_gdpr_anonymisation/

You can find also information about this new feature in our Expert Exchange website from the following url:
https://sites.google.com/a/brainwave.fr/brainwave-expert-exchange/documentation/igrc-plateform/workflow/workflow-components/anonymize-identities-gdpr

This document does not pretend to describe workflows' creation, configuration, operating principle and more generally to detail iGRC studio's functionalities.

A full documentation that deals with Workflow is available in the Expert Exchange platform using the following URL:
https://sites.google.com/a/brainwave.fr/brainwave-expert-exchange/documentation/igrc-plateform/workflow

And more generally, the full documentation that deals with iGRC studio is available using the following URL:
https://sites.google.com/a/brainwave.fr/brainwave-expert-exchange/documentation/igrc-plateform

2. GDPR – right to be forgotten add-on description

2.1. Add-on functionalities

In order to comply to the new General Data Protection Regulation (GDPR) you may have to "delete" personal data from the Ledger to conform to the 'right to be forgotten' (ie for Clients). The need to delete personal data remains a rare process, as Brainwave iGRC aims to keep audit history for security reason.

This 'anonymisation' add-on has been developed to answer this need and appears in the product as a workflow. Uids from selected identities are passed to a workflow that will replace the real data by the string 'anonymised' in every timeslots where the identity was present.

2.2. pre-requisites

Compatibility matrix

2015		2016					2017		
R1	R2	R1	R2	R3 SP14	R2	R3	R1	R2	R3
No	No	No	No	**Yes**	No	No	No	No	**Yes**

Versions: bw_gdpr_anonymisation.1.0 for 2016 R3 SP14 and 1.1 for 2017 R3.

All the add-on versions are available in the marketplace website using URL: https://marketplace.brainwavegrc.com/package/bw_gdpr_anonymisation /

This add-on depends on the Task manager since it uses the workflow engine.

2.3. Add-on content

This add-on contains a workflow file in order to manage the anonymisation process. This file is available at format « .workflow » and is provided with a .javascript
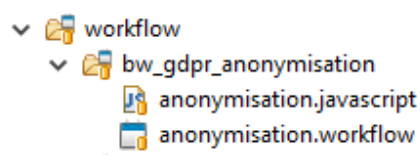
Dashboards and features are also provided to allow by default the iGRC Administrator to execute the anonymisation of data from the web portal:

- webportal
  - features
    - bw_gdpr_anonymisation
      - bw_gdpr_anonymisation.features
      - bw_gdpr_anonymisation.featuresets
  - pages
    - bw_gdpr_anonymisation
      - righttobeforgotten.page

Views are also available to provide data display in dashboards and pages:

- views
  - bw_gdpr_anonymisation
    - current_identities.view
    - deleted_identities.view

## 3. GDPR – right to be forgotten add-on installation procedure

3.1. Installation procedure

The add-on is available as a ".facet" format file, which is managed natively by the Brainwave iGRC studio. It eases installation, updates and remove of the add-on in Brainwave GRC projects.
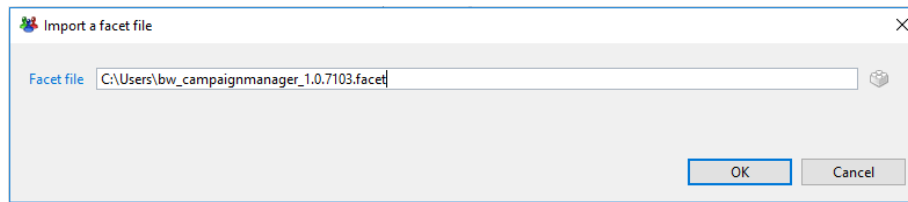
In order to install the add-on, from the iGRC studio open using the left menu the project configuration window by clicking on « Show project configuration".
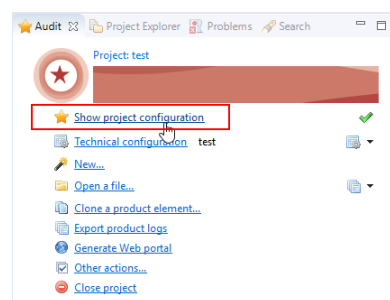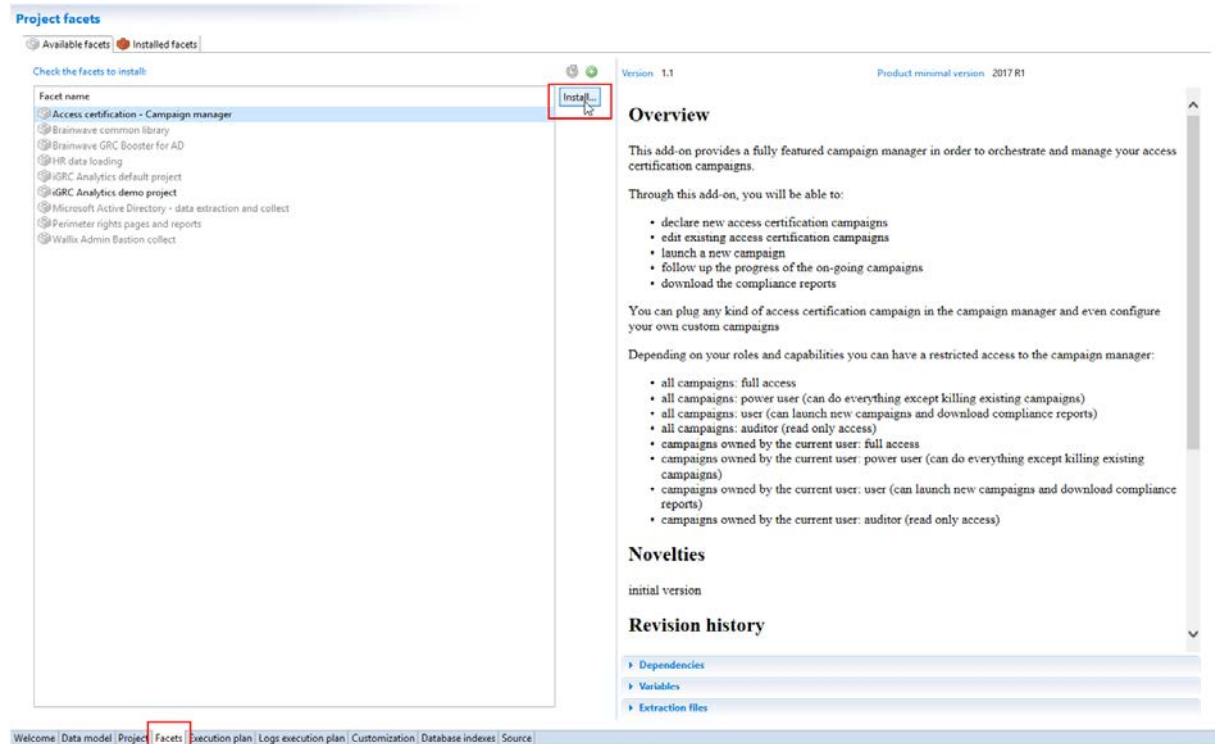

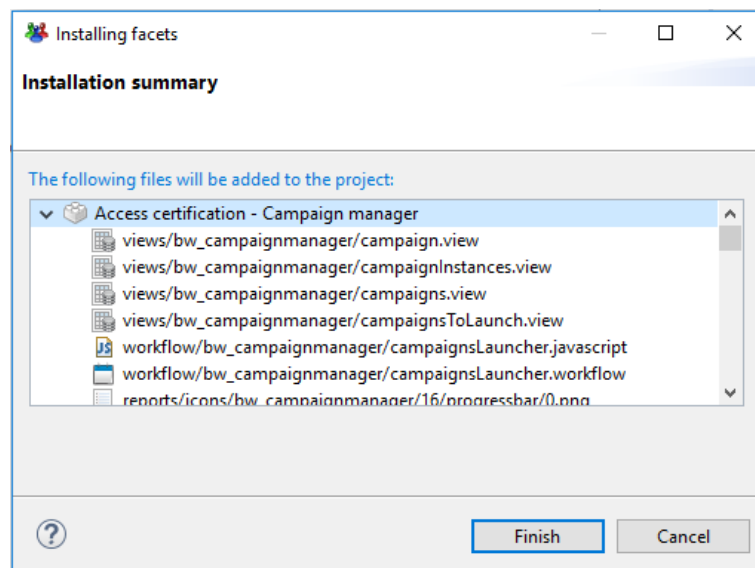Select the bottom tab « Facets » and click on the 'plus' button to add an add-on.
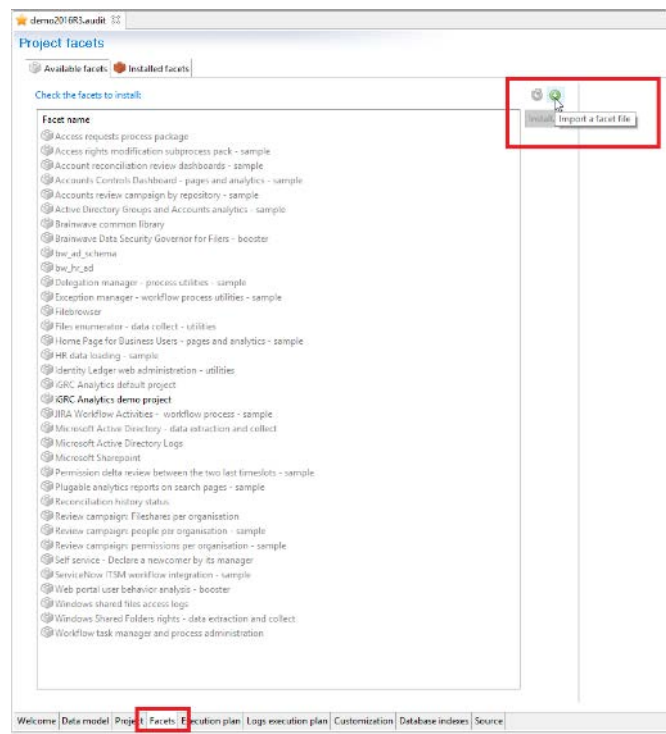
Then select the add-on and click on OK :

In the tab « Available facets», select the add-on to install and click on the « install… » button after having previously install the dependency: the task manager add-on:
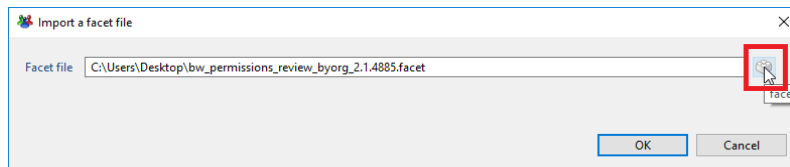

A pop-up window opens, describing all the files that will be installed during the procedure.
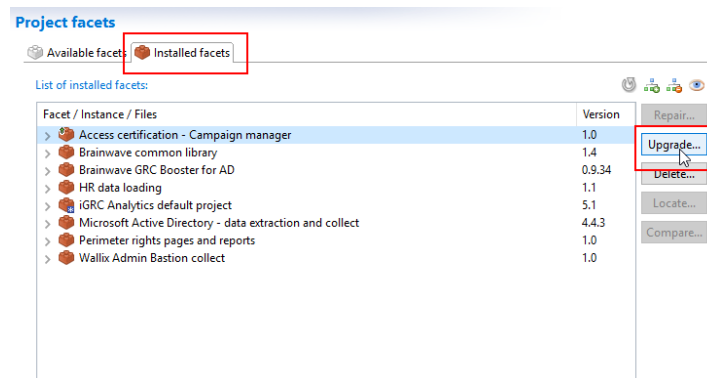

Click on "Finish" to proceed.

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## 3.2.   Add-on update and remove procedures

To update the add-on, follow the same procedure as previously to import the last version of the add-on:

Then from the « Installed facets » tab, select the add-on "Access certification - Campaign manager" and click on « Upgrade… » to upgrade the add-on.
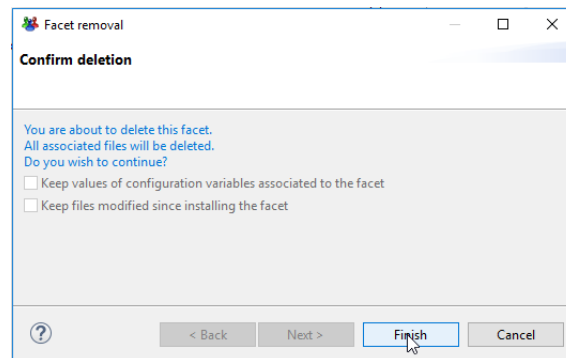

A pop-up window describes the files that will be upgraded during the procedure. By selecting "Keep replaced files…" the replaced files are kept by renaming as ".old". Click on "Finish" to launch the upgrade.
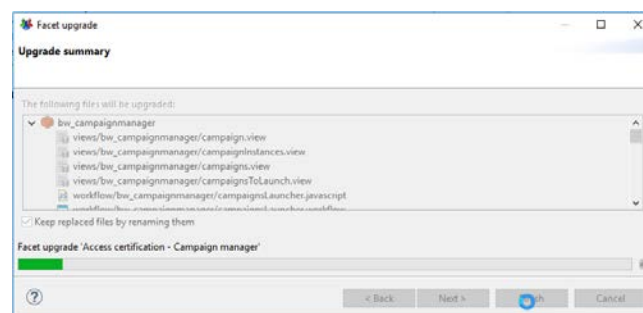
To uninstall the add-on, select it in the list then click on « Delete… ».
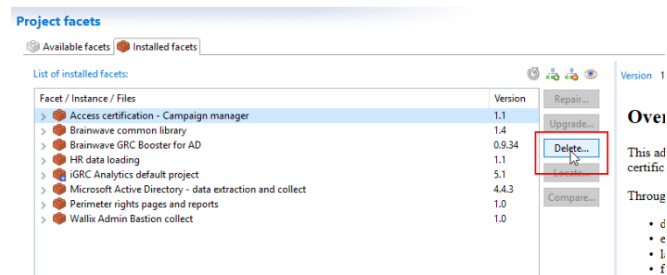
A "confirm deletion" pop-up window opens. Click on "Finish" to execute the deletion.

Note that after having installed or updated an add-on of type workflow, you should restart the iGRC studio and the tomcat service to take into account the changes.

Several steps are to be followed:

4.1.   Technical configuration of your project

A new GDPR tab has been added to the technical configuration in the studio. In this new tab you can choose which fields (for accounts and identities) should be anonymized. Because those fields can vary from one project to another, the lists of fields are customizable, but are limited to string type attributes. A default selection has been added and includes hrcode, nickname, givenname, middlename, surname, altname, fullname, mail, phone and mobile for identities and user's givenname, surname username and mail for accounts.

New tab "GDPR" available in the technical configuration

Once the fields selected, the portal should be relaunched.

4.2.   Web portal page configuration

The workflow can then be started through the page included in the facet. Access to the page is controlled by a feature. You can manage who has access the page in the bw_gdpr_anonymisation.featuresets file :

Anonymisation web page

The page itself will display either the identities that are no longer part of the company (no longer present in the HR files), or, if needed, identities that are still present in the current timeslot (not recommended). Once the identities selected, the workflow can be started and will anonymised selected identities (tables tidentity, taccount, treconciliation and, if relevant, in tdelegation, tticketlog and tticketaction). One ticketreview by identity anonymized will be created, their uid will be added to the ccomment field of the ticket, and the actor of the process will also be added to the ticketreview.

Best practice: extend the anonymization to the identities who have left the company and their owned accounts.

When someone ask to be forgotten or is going to leave the company very soon, we strongly recommend to anonymize the attribute used by this end-user to connect to the Brainwave iGRC web portal when this end-user is still present in the current timelot.

Please check during the next data upload that this identity has been removed from the HR data sources.