

GDPR: MICROSOFT POWER PLATFORM

IS GDPR RELEVANT FOR MY ORGANIZATION?

Your application(s) should comply with GDPR if:

- · Your organization is based in the EU, or
- If your application(s) process data from EU residents.

Note: Application owners are responsible for implementing data protection measures and demonstrating their GDPR compliance, even if the production of their applications is outsourced to another company (for instance a cloud provider, hosting them in production) - see Recital 74.

WHAT ARE YOUR OBLIGATIONS UNDER THE GDPR?

Application owners should comply with the following requirements: Design: for better protection, you should design and implement data protection measures together with the design and development of your application(s) (Article 25).

Data access control: you should implement mechanisms to ensure that personal data is only processed by authorized personnel, and only when necessary (Article 25). This implies 1) a secured mechanism should control the identity of personnel accessing data and 2) a control mechanism should restrict access to data according to each personnel authorizations.

Log and Audit: you should maintain records of processing activities for all personal data. These records must be made

available to supervisory authorities on request (Article 30).

Data breaches: in case of a data breach, you are under a legal obligation to notify the authorities within 72 hours after having become aware of it (Article 33). All the persons impacted by this breach must also be identified and notified (Article 34).

User consent & access: should you request user consent, it must be explicit (opt-in) and easy to withdraw.

You should explain which personal data is processed and how. You should indicate their retention time, and providing contact information to access, modify, erase or transfer their data to another system if they wish to.

IS EVERY POWER PLATFORM PROJECT RELEVANT FOR ASSESSMENT?

Only apps, flows and dashboards are relevant for GDPR assessments, that process any kind of personal, professional,

private or public information, related to an individual (name, address, photo, email, financial details, medical information...).

HOW TO RECORD MY GDPR ASSESSMENTS COMPLIANT?

The record of processing activities allows you to make an inventory of the data processing and to have an over-view of what you are doing with the concerned personal data. The recording obligation is stated by article 30 of the GDPR.

The record is a document with inventory and analysis purposes, which must reflect the reality of your personal data processing and allow you to precisely identify, among others:

The actors involved (controller, processors, representative, joint controller, etc.) in the data processing:

- The categories of data processed;
- The purpose of the processing (what you do with the collected personal data), who has access and who are the recipients of the personal data;

- For how long you are retaining the personal data;
- The technical and organizational security measures implemented.

Concept for data deletion Creating and updating the record are occasions to identify and to hierarchize the processing risks in light of the GDPR. This essential step will allow you to delineate an action plan of your processing complying with data protection rules.

The record must be held by controllers or processors themselves. Thereby, they can have an overview on all activities of personal data processing they operate.



HOW TO REDUCE THE RISK OF INCOMPLIANT POWER PLATFORM PROJECTS WITH RUNPIPE?



RISK ALERTS

In Runpipe you setup compliance policies based on project meta data and your Microsoft tenant, triggering actions as those policies are violated (e.g. "No external sharing of SAP Data, Orphaned Power Apps).



PROJECT DOCUMENTATION

Runpipe's project space is the collaborative place to plan, research and document solutions being built on Microsoft's Power Platform within your development team. Use the same documentation as a record of processing activities for your GDPR documentation.



APPROVAL WORKFLOWS

Use review workflows helping you to govern the way Power Platform projects are setup, by including all stakeholders like Information Security and Workers Council. Review approvals are documented in PDF Files, that are being automatically created within Runpipe.



COMPLIANCE TRAININGS

Coach your people to build compliant digital solutions by design. Runpipe's Training Hub let's you promote on-demand and instructor-led compliance and technology trainings.



COMPLIANCE GUIDANCE

Use Runpipe's wiki to write down your governance guidelines. Let your people be confident in choosing the best Low-Code Tool depending on the problem they like to solve. Use Runpipe's wiki to share experiences and knowledge.



TENANT SECURITY

Runpipe will scan your existing Microsoft 365 Tenant for existing Power Platform Apps, Flows and Dashboards, looking for missing owners, used data connectors, activity and usage. It will show potential risks associated with the Power Platform.

