



**CRONOS**  
**EUROPA**

Digital solutions for European institutions

# GDPR awareness for the CV tool managers

Internal use only

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**GDPR essentials**

## Importance of the compliance to GDPR



- General Data Protection Regulation is designed to protect personal data linked to individuals
- Any tool storing private data must comply to GDPR rules
- A data breach can lead to very expensive fines: The GDPR allows the EU's Data Protection Authorities to issue fines of up to **€20 million (\$24.1 million) or 4% of annual global turnover** (whichever is higher)
- A clear framework ensure that personal data breaches do not happen.

# PERSONAL DATA

WHAT IS AND WHAT IS NOT CONSIDERED PERSONAL DATA  
+ SPECIAL CATEGORY

PERSONAL DATA	SPECIAL CATEGORIES	NOT PERSONAL DATA
<ul style="list-style-type: none"><li>• name</li><li>• email address (name.surname@domain.com)</li><li>• phone number</li><li>• Internet Protocol (IP) address</li><li>• home address</li></ul>	<ul style="list-style-type: none"><li>• criminal records</li><li>• personal data related to racial or ethnic origin</li><li>• medical records</li><li>• religious or philosophical beliefs</li><li>• trade-union membership</li><li>• blood type</li><li>• political stands...</li></ul>	<ul style="list-style-type: none"><li>• a company registration number;</li><li>• an email address as info@company.com</li><li>• anonymized data</li><li>• information about legal entities</li><li>• data related to a deceased individual</li></ul>

# EVERYTHING YOU NEED TO KNOW ABOUT



## 7 GDPR DATA PROTECTION PRINCIPLES



## Legal grounds - examples

You're trying to save someone's life.

You asked the Data Subject's consent.

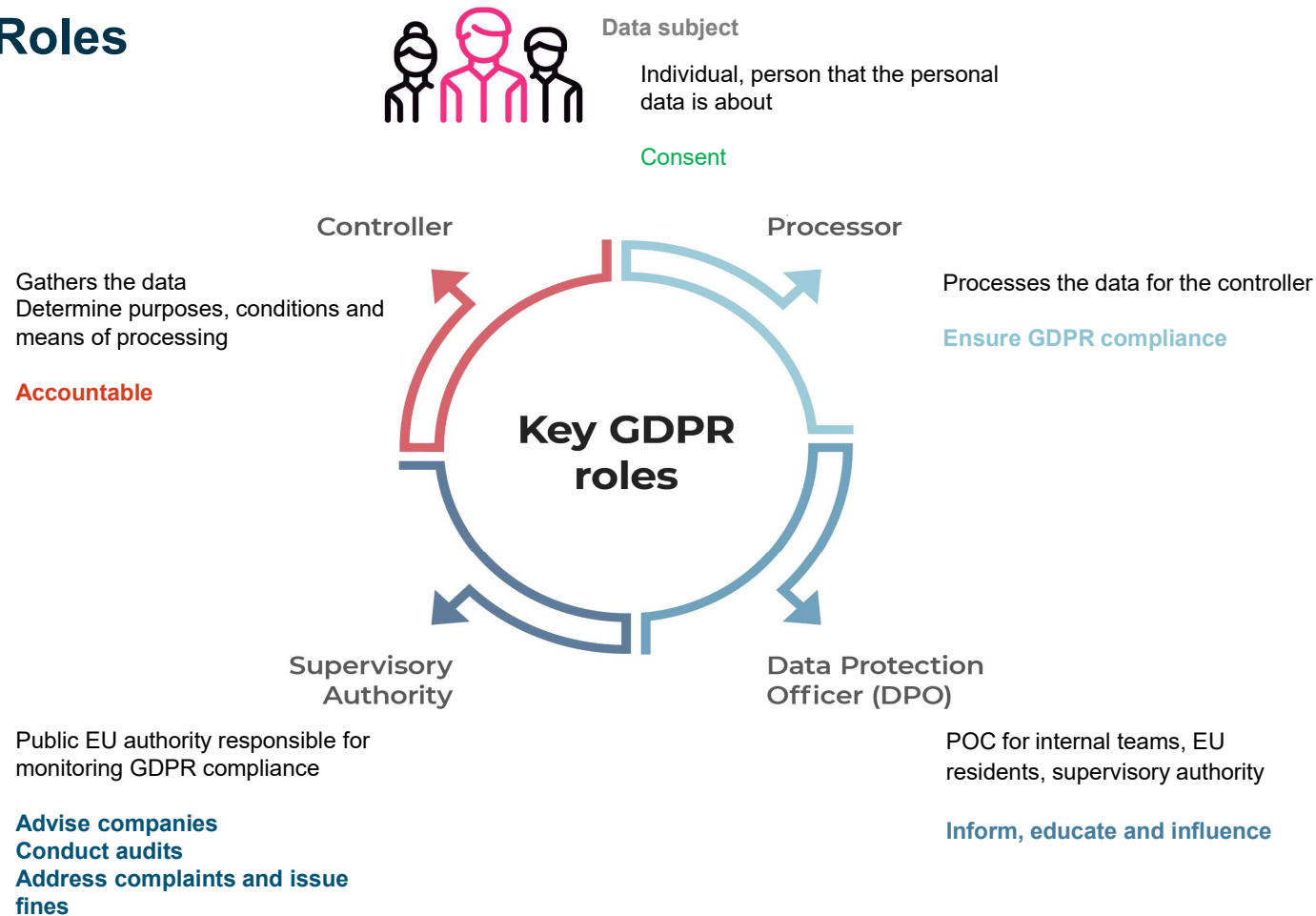
The data may be useful for future reference.

You need to save the data for government audits.

All of these, except 'for future reference' are possible grounds for data processing. The safest is to **ask for the Data Subject's consent**, but reasons like: having a contract, wanting to save someone's life... are also good reasons to process data.

However, according to GDPR, **you can no longer process personal data 'just' for future reference**, or because they can come in handy later.

## Roles



**Data breach = breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data**



**What's new?**



## What's new?

- Management decision
  - **Consent** is mandatory for candidates, **retention period = 1 year**
  - Employees and sub-contactors / free-lancers are under contract with Cronos. Personal data used is restricted to the business needs and comply by **contractual** necessity.
- New Privacy Policy (PP) statement to **inform** the data subject on:
  - What personal data is stored in the CV tool
  - How it is used, for what purpose and how long
  - How to exercise users' rights
- **Security** enhancements for the CV tool
  - 2 steps login
  - SLA with ENSPIRIT
- Data Protection Officer (DPO) appointed, and procedures defined:
  - Role: **inform, educate and influence**
  - Mailbox to answer data subject requests
  - Data subject Request Form
  - Procedures: how to answer the requests

## General Data Protection Regulation

From 25/05/2018 the GDPR aims to harmonize personal data usage in European Union to better protect your private life.



Cronos  
CV Tool  
Generator

- ISO 9001 – Quality management
- ISO 14001 – Environmental impact management
- ISO 27001 – Information security management
- ISO 20000-1 – Service management

### Retention Period

Contact data	1 year
Profession related data	1 year
• Work experience, Education, Trainings, Languages	
Functional cookies	3 months
Backups	30 days

### Objectives

- Business processing**
- Evaluate a profile for employment
  - Answer call for tenders
  - Propose a profile to a client
- Legal obligations**

### Your rights

- Consent / Restrict usage
- Correct / Update your data
- Right to be forgotten / delete
- Get an extract of your data

### Security

- Confidentiality: role-based access according to the objectives
- Service level agreements with clients and technical partners

Contact: [privacy@cronoseuropa.com](mailto:privacy@cronoseuropa.com).

Your request will be processed according to your rights and in compliance with the regulation

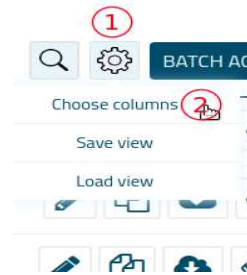
**CV Tool implementation**

## Implementation in the CV tool

- **Privacy statement:** the last version of the document is uploaded in the CV tool (pdf)
- **Consent data by person:** unique email address
- **Consent details are stored:**
  - The consent as a YES/NO
  - The Privacy Policy version that the user is requested/consents/rejects to
  - The timestamp when the consent request was requested
  - The timestamp when the person gave feedback:
    - When the person log in, we consider this feedback as a rejection
    - When the person consents, we consider this feedback as a consent.
- **Manager:** a new field is added in the CV allowing any manager to work on his/her set of CVs and perform the following actions:
  - Deactivate CV(s)
  - Delete CV(s)

## Consent details in the CV tool – CV lists (1)

1. Open the list configuration

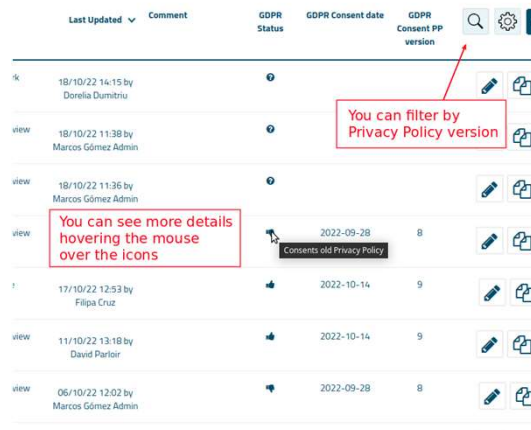


2. Select the columns

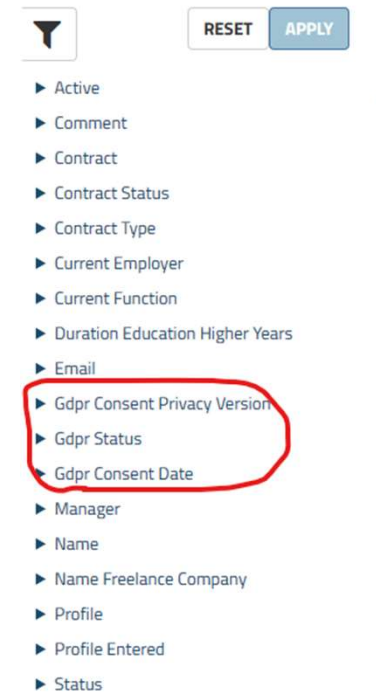
- ☐ GDPR STATUS
- ☐ GDPR CONSENT DATE
- ☐ GDPR CONSENT PP VERSION

## Consent details in the CV tool – CV lists (2)

### Result



Last Updated	Comment	GDPR Status	GDPR Consent date	GDPR Consent PP version
18/10/22 14:15 by Dorella Dumitriu				
view	18/10/22 11:38 by Marcos Gómez Admin			
view	18/10/22 11:36 by Marcos Gómez Admin			
view			2022-09-28	8
17/10/22 12:53 by Filipa Cruz			2022-10-14	9
view	11/10/22 13:18 by David Parlier		2022-10-14	9
view	06/10/22 12:02 by Marcos Gómez Admin		2022-09-28	8



RESET APPLY

- Active
- Comment
- Contract
- Contract Status
- Contract Type
- Current Employer
- Current Function
- Duration Education Higher Years
- Email
- Gdpr Consent Privacy Version
- Gdpr Status
- Gdpr Consent Date
- Manager
- Name
- Name Freelance Company
- Profile
- Profile Entered
- Status

Sort by: GDPR status, GDPR consent date, GDPR consent PP version

Filter by: GDPR status, GDPR consent date, GDPR consent PP version

## Consent details in the CV tool – access links

When the user manages the candidate access links, the GDPR related info is displayed...

ACCESS LINKS

Name: Filipa Filipa Email: [filipa@sigreat.org](mailto:filipa@sigreat.org)

GDPR: Rejects old Privacy Policy

Current Privacy Policy: version #2 10/01/2020

- Consent related to PP version: #1
- Consent request created on: Unknown
- Last updated: 09/28/2021
- Last feedback by the person: On 09/28/2021 with the email [filipa@sigreat.org](mailto:filipa@sigreat.org)

Date	By Who	Email address	Status
22/10/22 09:59	Active Admin	<a href="mailto:filipa@sigreat.org">filipa@sigreat.org</a>	
24/10/22 09:59	Active Admin	<a href="mailto:filipa@sigreat.org">filipa@sigreat.org</a>	

OK

...and these are the possible statuses:

GDPR: Not requested

Current Privacy Policy: version #2 10/01/2020

GDPR: Requested

Current Privacy Policy: version #2 10/01/2020

- Consent related to PP version: #2
- Consent request created on: 06/28/2021
- Last updated: 09/28/2021
- Last feedback by the person: None yet

GDPR: Consents

Current Privacy Policy: version #2 10/01/2020

- Consent related to PP version: #2
- Consent request created on: 11/18/2022
- Last updated: 11/18/2022
- Last feedback by the person: On 11/18/2022 with the email [asdfi](mailto:asdfi)

GDPR: Rejects active Privacy Policy

Current Privacy Policy: version #2 10/01/2020

- Consent related to PP version: #2
- Consent request created on: 06/28/2021
- Last updated: 09/28/2021
- Last feedback by the person: On 09/28/2022 with the email [testi](mailto:testi)

GDPR: Rejects old Privacy Policy

Current Privacy Policy: version #2 10/01/2020

- Consent related to PP version: #1
- Consent request created on: Unknown
- Last updated: 09/28/2021
- Last feedback by the person: On 09/28/2021 with the email

GDPR: Consents old Privacy Policy

Current Privacy Policy: version #2 10/01/2020

- Consent related to PP version: #1
- Consent request created on: 06/28/2021
- Last updated: 09/28/2021
- Last feedback by the person: On 09/28/2021 with the email [david@parloir.com](mailto:david@parloir.com)

GDPR: Obsolete: old consent

Current Privacy Policy: version #2 10/01/2020

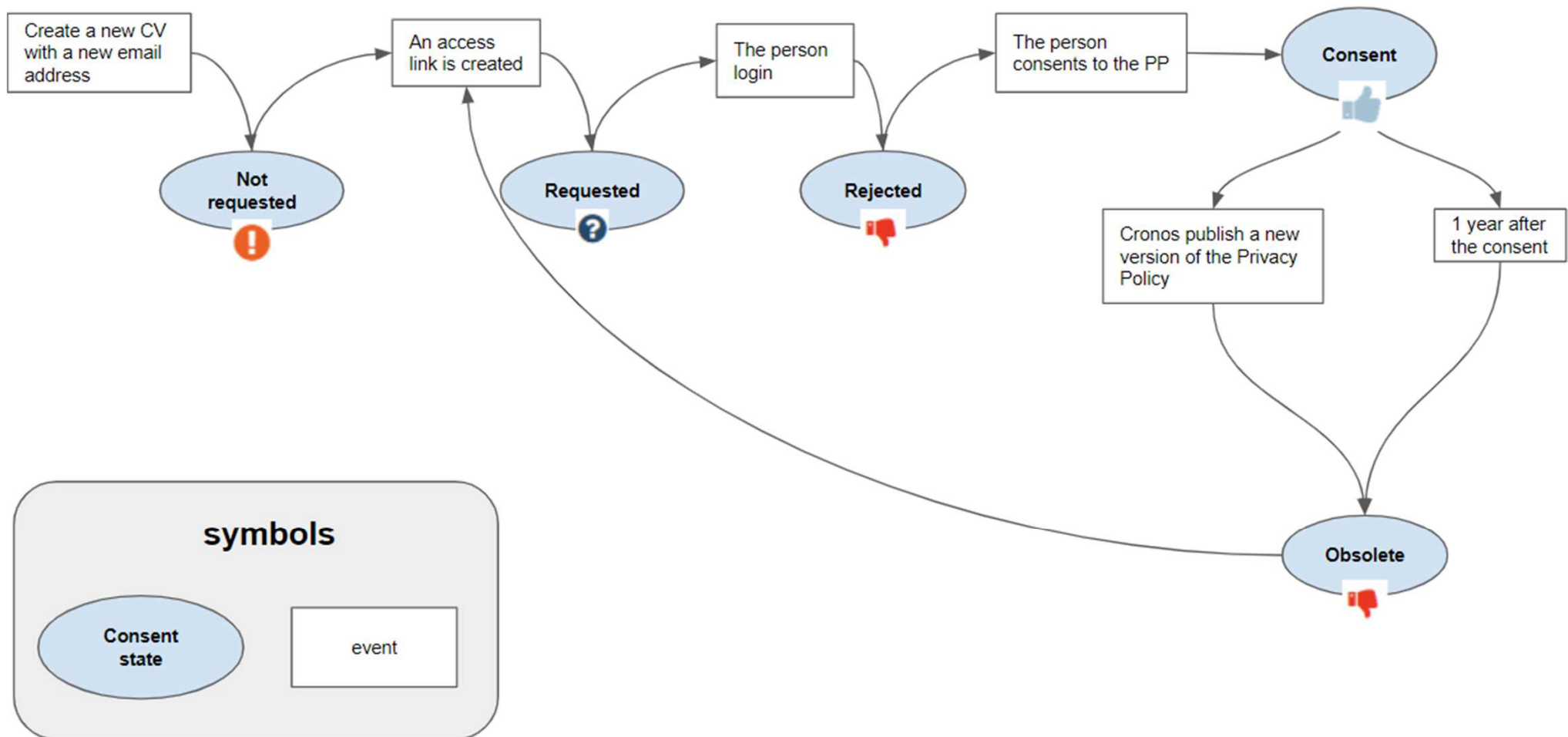
- Consent related to PP version: #2
- Consent request created on: 06/28/2021
- Last updated: 09/28/2021
- Last feedback by the person: On 09/28/2021 with the email [test05@enspiri](mailto:test05@enspiri)

## | Consent states

- ❗ Not requested
- ❓ Requested = *an access link has been created but the person did not login yet*
- 👍 Consents = *consents to the active PP sometime in the last year*
- 👎 Rejects active PP
- 👎 Consents to old PP
- 👎 Rejects old PP
- 👎 Obsolete = *consents to the active PP more than a year ago*



Consent lifecycle, starting when the person doesn't have a valid consent  
(When the person has a valid consent, there is no changes on it)



## Consent management

Event	Consent status	Icon	Comment	Action
Create new CV	Not requested	!	Temporary status until an access link is sent to the candidate.	SEND ACCESS LINK
Access link sent	Requested	?	The link stays valid for 2 weeks. A reminder is sent by the system 3 days before expiration.	FOLLOW-UP
Candidates' login	Rejected	👎	The status is set as Rejected by default until a consent is explicitly provided to the Privacy Policy. Without a consent the CV tool cannot be used by the candidate.	DELETE
Consent approval	Consent	👍	Date of the consent and Privacy Policy version are recorded with the status	N/A
New Privacy Policy version activated	Obsolete consent	👎	The activation of a new version of the Privacy Policy makes the consent become obsolete	SEND ACCESS LINK
Consent date + 1 year	Obsolete consent	👎	The consent is valid for 1 year only	SEND ACCESS LINK
End of contract			The end of contract = end of consent	DELETE

### Actions details

Action	Details
SEND ACCESS LINK	<p>A new access link must be sent to get a consent and up-to-date CV details.</p> <p>For a new CV (no consent never received before), contact the candidate to explain Cronos need the CV data to have business with her/him.</p> <p>If the consent is obsolete (existing CV), check if the candidate is still of interest for Cronos business:</p> <ul style="list-style-type: none"> <li>• If Yes: Send Access link to get new consent</li> <li>• If No: DELETE all profiles with the same email address.</li> </ul>
FOLLOW-UP	<p>Without a consent the candidate's data cannot be kept.</p> <p>Contact the person to get the consent, re-send the access link if needed.</p>
DELETE	If the candidate still doesn't want to provide a consent, the related data <b>MUST be deleted</b> .

**GDPR compliance checks**

## GDPR compliance checks

Cronos cannot store personal data for candidates more than 1 year without a valid consent

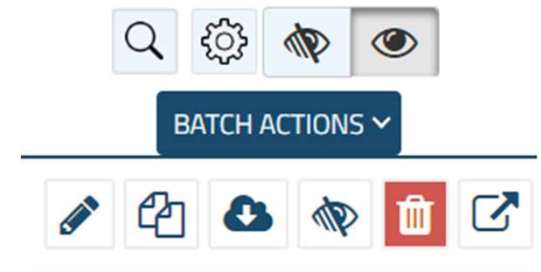
- CV tool data clean-up – initial
  - For profiles still of interest who did not yet consent to the latest version of the Privacy Policy, **send the link so they can give a new consent and update their CV**
  - For obsolete profiles and rejected consents, **delete the profiles**
- CV tool - monthly checks
  - The same checks than made initially must be regularly reproduced so to delete any data without a valid consent of the candidate
- Exported data - clean-up after use
  - No personal data must be stored outside the CV tool without a clean-up after processing



## CV tool – tailor your actions

➤ List all CVs managed by you:

- Add the manager field in your view, then filter by manager
- Search by manager



➤ List all CVs (active and inactive): only active CVs by default, access inactive CVs with the filter option

➤ Activate / deactivate: a new CV is active by default. Deactivation is revocable.

➤ Delete: deletion is not revocable.

**What's next?**



## | What's next?

- Better distinguish employee from candidate
- Automatic reporting to help the clean-up
- Structure data by person and link to NetSuite Id

## References





## Information available

- @ CRONOS Europa

- Privacy statement: [CV Tool Privacy Statement-V2.0.docx](#)
- GDPR request form: [Privacy Statement-GDPR Request form-V1.0.docx](#)

### @ CRONOS Group

- [Privacy@Cronos \(sharepoint.com\)](#)
  - Introduction to GDPR (eLearning): [GDPR\\_update22062018 \(cronos-groep.be\)](#)
- Official GDPR website <https://gdpr-info.eu>

**Things to remember**



- ☐ Never process personal data without consent:
  - ☐ Employees = a **valid Contract**
  - ☐ Candidates = a **valid Consent**
- ☐ Notify any potential breach to the DPO: [privacy@cronoseuropa.com](mailto:privacy@cronoseuropa.com)
- ☐ Do NOT propagate personal data in external systems if they are not in the list of the processing systems declared in the Privacy Policy or in an SLA with third parties.