

GDPR DEVELOPER'S GUIDE

1

DEVELOP IN COMPLIANCE WITH THE GDPR

Whether you work alone, are part of a team developing a project, manage a development team, or are a service provider carrying out developments for third parties, it is essential to ensure that user data and all personal data processing are sufficiently protected throughout the lifecycle of the project.

2

IDENTIFY PERSONAL DATA

Understanding the notions of "personal data", "purpose" and "processing" is essential to ensure that software complies with the law when it processes user data. In particular, be careful not to confuse "anonymisation" and "pseudonymization", which have very precise and different definitions in the GDPR.

3

PREPARE YOUR DEVELOPMENT

The principles of personal data protection must be integrated into IT developments from the design phase onwards in order to protect the privacy of the people whose data you are going to process, to give them better control over their data and to limit errors, losses, unauthorised modifications or misuses of their data in applications.

4

MANAGE YOUR SOURCE CODE

Whatever the size of your project, it is highly recommended to use a source code management tool, such as a version control system, to track its different versions over time.

5

MAKE AN INFORMED CHOICE OF ARCHITECTURE

When designing the architecture of your application, you must identify personal data that will be collected and define a path and life cycle for each of them. The choice of supporting assets (local storage, server, cloud service) is a crucial step, which must be adapted to your needs, but also to your technical knowledge. The registry and conduction a privacy impact assesment can assist you in this choice.

GDPR DEVELOPER'S GUIDE

6

SECURE YOUR WEBSITES, APPLICATIONS AND SERVERS

Any website, application or server must incorporate basic state-of-the-art security rules, not only on network communications but also on authentication and infrastructure.

7

MINIMIZE DATA COLLECTION

You shall only collect personal data that is adequate, relevant and necessary in relation to the purposes for which they are processed, as defined at the time of collection.

8

MANAGE USER PROFILES

The way to manage profiles of your collaborators and your end-users must be thought out upstream of your developments. It consists in defining different access and authorization profiles so that each person can access only the data he or she actually needs.

9

CONTROL YOUR LIBRARIES AND SDKS

Do you use libraries, SDKs, or other software components written by third parties?

10

ENSURE QUALITY OF THE CODE AND ITS DOCUMENTATION

It is essential to adopt good code-writing techniques as soon as possible. Code readability reduce the effort of maintenance and bug fixes over time for you and your (possibly future)collaborators.

GDPR DEVELOPER'S GUIDE

11

TEST YOUR APPLICATIONS

Testing your product allows you to check its correct operation, to ensure a good user experience and to find and prevent defects before it goes into production. Testing your product also reduces the risk of personal data breaches.

12

INFORM USERS

The transparency principle of the GDPR requires that any information or communication relating to the processing of personal data should be concise, transparent, comprehensible and easily accessible in plain and simple language.

13

PREPARE FOR THE EXERCISE OF PEOPLE RIGHTS

Preparing in advance how they will contact you and how you will deal with their requests will enable you to manage the exercise of these rights effectively.

14

DEFINE A DATA RETENTION PERIOD

Personal data cannot be kept for an indefinite period of time: this must be defined according to the purposes of the processing. ..

15

TAKE INTO ACCOUNT THE LEGAL BASIS IN THE TECHNICAL IMPLEMENTATION

The legal basis of a processing operation is in a way the justification of the existence of the processing operation

16

USE ANALYTICS ON YOUR WEBSITES AND APPLICATIONS

Audience measurement tools are used to obtain information about the navigation of visitors on a website or mobile application. In particular, they make it possible to understand how users arrive at a site and to reconstruct their journey. Using cookies, they are subject to the rule of consent, except in one particular case.