



GDPR Letter of Applicability  
Connectivity Model Service (CMS) 1.3

Release date: 17-Dec-2018

13-Dec-2018

Dear CMS 1.3 customer:

This letter serves to notify you of the applicability of the European Union's (EU) General Data Protection Regulation (GDPR) to the Standard Product Version<sup>1</sup> of the GE product and its release listed above.

**Processing of Personal Data**

<b>Product Owner/Operator's Employees and/or Contractors Personal Data<sup>2</sup></b>			
Select One:	<input type="radio"/> Some	<input checked="" type="checkbox"/> No	Personal Data is <b>required</b> to be Processed by this release the product for Normal, Expected Operation and Use of the product
Select One:	<input type="radio"/> Some	<input checked="" type="checkbox"/> No	Personal Data <b>may optionally be configured</b> to be Processed by this release of the product as part of Normal, Expected Operation and Use of the product
See Annex A for what Product Owner/Operator's Employees and/or Contractors Personal Data is Processed, if any			

<b>Populace Personal Data<sup>3</sup></b>			
Select One:	<input type="radio"/> Some	<input checked="" type="checkbox"/> No	Personal Data is <b>required</b> to be Processed by this release of this product for Normal, Expected Operation and Use of the product
Select One:	<input type="radio"/> Some	<input checked="" type="checkbox"/> No	Personal Data <b>may optionally be configured</b> to be Processed by this version of this product as part of Normal, Expected Operation and Use of the product
See Annex B for what Populace Personal Data is Processed, if any			

If "Some" is selected for any of the above, GE believes that the product release may be subject to GDPR.

Please review the Annex(s) below for information on what Personal Data is Processed by this release of the product, along with your specific implementation of the product, in order to determine the applicability of GDPR to your product environment.

<sup>1</sup> If your product has been customized or modified, please review the use of personal data by the customizations/modifications with the team who authored and implemented the customs/modifications.

<sup>2</sup> Examples would likely include "jane.doe@utility.com," "EMS Operator," "Business Cell: 123-456-7890," etc.

<sup>3</sup> Examples would likely include "john.smith@gmail.com," "221b Baker Street, London, England"

## **Privacy by Design**

GE Power continues to enhance, sell and support products that, at their core, were originally designed, developed, and released 10-20 years ago, before personal data privacy was a prominent concern in critical infrastructure industries. For these products, where Privacy by Design was not formally considered as part of the initial design and development or during subsequent releases to date, data privacy must primarily be accomplished through the use of organizational and defense-in-depth measures<sup>4</sup> taken by the GE customer. GE provides Secure Deployment Guidelines where required and Security by Design is a key element of recent product developments. These guidelines can help with the implementation of organization and defense-in-depth measures.

More recently, GE Power has instituted a Privacy by Design development policy that applies to all current and future development. As subsequent releases of existing products pass through this new process, we intend to consider and implement additional technical measures to enhance data privacy.

All new capabilities within new product releases will be subject to this Privacy by Design development policy from initial release, with strict requirements on documenting and recording Privacy by Design considerations during product design and development.

## **Closing**

GE Power understands that the transition to GDPR will not be easy for our customers and we remain committed to helping you through this transition as well as providing new products and/or enhancements to existing products that will make compliance with GDPR easier in the future.

Please contact your appropriate product representative(s) with any additional questions, concerns, comments or feedback.

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<sup>4</sup> Such as those outlined in the ISO 27k family, CIS Controls and Benchmarks, Australia's Top 4 and Essential Eight, NIST SP 800-53, etc.

## Annex A: Glossary

Term	Definition
Intended Use	
Normal, Expected Operation and Use	
Personal Data	any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
Populace	those customers of GE Power's customer, i.e. the power utility or telco's customers that are consuming the power or services the utility or telco provides
Post-Release Privacy by Design review	A process for products/versions that have already been released that consists of reviewing what personal data is currently processed by a product, why that personal data is required/optional, that the product is only using the personal data for legitimate, intended purposes, and reviewing how the personal data is currently protected within that product
Privacy by Design	<p>The consideration of</p> <p>“appropriate technical and organisational measures for ensuring that, by default, only personal data which are necessary for each specific purpose of the processing are processed”</p> <p>AND</p> <p>“appropriate technical and organisational measures, such as pseudonymisation, which are designed to implement data-protection principles, such as data minimisation, in an effective manner and to integrate the necessary safeguards into the processing”</p> <p>AND</p> <p>“the right to be forgotten”</p> <p>during product design and development, specifically in consideration of GDPR and its requirements.</p>
Process (Processes, Processing)	any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
Product Owner/Operator	a GE Power customer using a GE product, typically a power utility, telco, market operator, etc.
Product Owner/Operator's Employees and/or Contractors	those people performing work directly for, or on behalf of, GE Power's customer using the GE product
Standard Product Version	<p>The GE product without any specific customizations or modifications made for a given customer</p> <p>(The practice of customizing or modifying the standard product is common in certain markets, such as the electric grid Transmission segment)</p>

**Annex B: Product Owner/Operator's Employee and/or Contractor Personal Data**

<b>Personal Data</b>	<b>Required / Optional / Not Processed</b>	<b>Why is it Processed?</b>	<b>Where is it Stored?</b>	<b>How is it Protected?</b>
<b>Birthdate</b>				
<b>Demographic Information</b>				
<b>Email Address (Business)</b>				
<b>Email Address (Personal)</b>				
<b>Emails</b>				
<b>Employer</b>				
<b>Gender</b>				
<b>ID Number (Business, as issued by Employer)</b>				
<b>ID Number (Personal)</b>				
<b>IP address associated with a person/user, as opposed to a server</b>				
<b>Job Title</b>				
<b>Name (First)</b>				
<b>Name (Last)</b>				
<b>Password</b>				
<b>Physical Location (Current)</b>				
<b>Physical Location (History)</b>				
<b>security credentials</b>				
<b>Spoken Languages</b>				
<b>Telephone Number (Business)</b>				
<b>Telephone Number (Personal)</b>				
<b>Username</b>				

## Annex C: Populace Personal Data

Personal Data	Required / Optional / Not Processed	Why is it Processed?	Where is it Stored?	How is it Protected?
Birthdate				
Demographic Information				
Email Address (Business)				
Email Address (Personal)				
Emails				
Employer				
Gender				
ID Number (Business, as issued by Employer)				
ID Number (Personal)				
IP address associated with a person/user, as opposed to a server				
Job Title				
Name (First)				
Name (Last)				
Password				
Physical Location (Current)				
Physical Location (History)				
security credentials				
Spoken Languages				
Telephone Number (Business)				
Telephone Number (Personal)				
Username				