Virgin Trains West Coast – CRM System Implementation

GDPR – Right to Erasure and Right of Access - VTWC

Commercial in confidence

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## Table of Contents

[Table of Contents 2](#_Toc527110707)

[**Document** **Management** 3](#_Toc527110708)

[1. Document Purpose 5](#_Toc527110709)

[2. Overview 5](#_Toc527110710)

[2.1. Right to Erasure (RtE) 5](#_Toc527110711)

[2.2. Right to Access (RtA) 5](#_Toc527110712)

[3. Functional Process – Right to Erasure (RtE) 6](#_Toc527110713)

[4. Functional Process – Right to Erasure – Data Mart for Anonmyisation 8](#_Toc527110714)

[5. Functional Process – Right to Erasure - Visual Overview Data Flow 15](#_Toc527110715)

[6. Considerations, Dependencies and Constraints – Right to Erasure 16](#_Toc527110716)

[7. Functional Process – Right to Access (RtA) 18](#_Toc527110717)

[8. Functional Process – Right to Access - Visual Overview Data Flow 20](#_Toc527110718)

[9. Considerations, Dependencies and Constraints – Right to Access 21](#_Toc527110719)

[10. Data Dictionary – Right to Access 22](#_Toc527110720)

## **Document** **Management**

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| **Supporting Documents** | | |
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| Merkle VTWC Technical Design | Technical Specification | [Click here](https://teams.microsoft.com/_#/vsd/viewer/teams/https%3A~2F~2Fmerkleinc.sharepoint.com~2Fsites~2FVirginTrainsWestCoast-CRMProject~2FShared%20Documents~2FGeneral~2FDevelopment%20Documentation~2FDesign%20Documentation~2FTechnical%20Overview~2FVTWC%20-Process%20Overview%20v0.1.vsd?thread) |
| Address Matching, Merging and Cleansing - VTWCv2 | Address matching, merging and cleansing specification | [Click here](https://teams.microsoft.com/_#/docx/viewer/teams/https%3A~2F~2Fmerkleinc.sharepoint.com~2Fsites~2FVirginTrainsWestCoast-CRMProject~2FShared%20Documents~2FGeneral~2FDevelopment%20Documentation~2FDesign%20Documentation~2FTechnical%20Overview~2FAddress%20Matching%2C%20Merging%20and%20Cle) |
| Data Categorisation Matrix | Data Categorisation Matrix | [not yet defined] |

|  |  |  |
| --- | --- | --- |
| **Glossary of Terms** | | |
| **Term Name** | **Description** | **Acronym, Synonyms** |
| SCV | Single Customer View | SCV |
| Customer | A person who has registered with VTWC resulting in a record being created in Tracs. This record does not require the person to have made a purchase |  |
| Prospect | A person who has interacted with a VTWC system and is not a customer but wishes to be contacted by VT |  |
| General Data Protection Regulation | The General Data Protection Regulation (GDPR) is the new data protection regulation adopted by the EU in April 2016. The Regulation governs the privacy practices of any organisation processing the Personal Data of EU citizens, and replaces the EU directive on which the current Data Protection Act (DPA) is based. | GDPR |
| Right to Erasure | Article 17 provides individuals with the Right to Erasure (the Right to be Forgotten) where an individual can request that all of their Personal Data is erased by the Data Controller. | RtE |
| Right to Access | An individual to request information from the Data Controller as to whether their Personal Data is being processed. | RtA |
| Subject | The subject is the person who has requested the right to either remove their details from the system of provided the information that is stored on them.  The subject covers both customer and individual/prospect. | Person |
| VTWC CRM Database | This is the single customer view database developed and supported by Merkle. | Phoenix |
| Personal Identifiable Information | Information that can be used to identify a subject/person | PII |

## Document Purpose

This document provides detailed instructions on how the Right to Access (RtA) and Right to Erasure (RtE) will be processed by the Merkle hosted VTWC CRM database.

This document does not provide guidance on the supporting operational model to deliver on these requirements.

## Overview

The General Data Protection Regulation (GDPR) is the new data protection regulation adopted by the EU in April 2016. The Regulation governs the privacy practices of any organisation processing the Personal Data of EU citizens, and replaces the EU directive on which the current Data Protection Act (DPA) is based.

Although the principles on which the GDPR are based are mainly the same as the DPA, the scope is broader, there are new obligations for organisations, and the rights of individuals are extended.

Although the rights of the individual cover right to object and right to portability, this document will only focus on the Right to Erasure and Right to Access.

## Right to Erasure (RtE)

In some situations, it may be necessary to erase or delete all or selected parts of an individual's personal data, i.e. at a granular level. Article 17 provides individuals with the Right to Erasure (the Right to be Forgotten) where an individual can request that all their Personal Data is erased by the Data Controller.

The Right to Erasure does not strictly mean that the individual’s record needs to be deleted, the PII, such as the Forename and Surname field, can be permanently updated so that the update is irreversible.

## Right to Access (RtA)

Covered within Article 15, the right to access is a right is for an individual to request information from the Data Controller as to whether their Personal Data is being processed. If it is, the Personal Data and the following information needs to be provided by Merkle to the Data Controller (VTWC):

* The categories of Personal Data concerned (listed below)
* The recipients or categories of recipient to whom the Personal Data have been or will be disclosed, in particular recipients in third party companies or international organisations which have their infrastructure based outside of the EU
* Where the Personal Data are not collected from the data subject, any available information as to its source
* The purposes of the processing and Legitimate Interest

If a data subject exercises his or her right of access against (1) Merkle, for data held by Merkle as a Data Controller, Merkle must be able retrieve and return the relevant data within a time limit of 1 month (extendible in certain circumstances); (2) a Data Controller who is Merkle client, where personal data held by Merkle as a processor for the client is in scope, the client will contact Merkle to provide all relevant data that Merkle holds on the Subject back to the client so that the client can respond to the data subject within 30 days.

However, Merkles SLA with VTWC is to process and supply RtA within 5 business service days from receipt of the Email from VT. VT’s obligation to the customer is within 28 days of their request to VT

## Functional Process – Right to Erasure (RtE)

The following section details the functional approach to meet the Right to Erasure requirements.

|  |  |
| --- | --- |
| **Ref** | **Description** |
| REF-001 | The email addresses of the subjects that have requested that VT remove from their systems will be uploaded to Box for manual extract by Merkle. VT will send Merkle Service Delivery a notification to [-Service\_Deliver@merkleinc.com](mailto:Dbg-Service_Deliver@merkleinc.com) to confirm that a file has been uploaded for processing   |  |  | | --- | --- | | Box Details |  | |  |  | |  |  | |
| REF-002 | Merkle Service Delivery team will raise the Jira Service desk case under the GDPR Service Desk Project and email VT that we have received the request. |
| REF-003 | A manual process will be performed to download the file and store it in a file system location. This will be, |
| REF-004 | The layout will be as follows and will be supplied with a header;   |  |  |  | | --- | --- | --- | | **Field\_Name** | **Field\_Data\_type** | **Business Rules** | | Incident Number | numeric | This is Virgin Trains own internal reference number. | | Data Subject Name | Varchar |  | | Email Address | Varchar |  | | Postcode | Varchar |  | | Date Added To Tracker | Date |  | |
| REF-005 | The following is the agreed naming convention for the inbound file;  VTWC\_Erasure\_Request\_DDMMYYYY.csv |
| REF-006 | A SSIS package will be developed to load the data into a staging location, once loaded the SSIS package will execute a Stored Procedure to run the pre-defined business logic (detailed in this section).  This will be run manually when the file has been moved into position by executing a SQL Agent job. |
| REF-007 | An automated Stored Procedure, residing on the CRM database will be developed to permanently erasure the subject’s information. |
| REF-008 | The Stored Procedure will support one-time manual execution. This means that the Service Delivery team need the relevant permissions to execute the code. |
| REF-009 | The Stored Procedure will be executed by populating a variable. The variable will be email address, as this is what has been agreed with the client as the primary match key. |
| REF-010 | The process must support the removal of data for both Customer and Individuals |
| REF-011 | Only the PII values will be anonymised i.e. the records will remain for referential integrity and reporting purposes but the PII will no longer exist. |
| REF-013 | No time constraints should be applied. All relevant information relating to an individual should be identified and permanently anonymised that the record will no longer be able to link back to a customer or individual. |
| REF-014 | The Stored Procedure should iterate through the metadata table (created int this [section](#_Functional_Process_–)) and remove the relevant PII information from the field defined in the categorise matrix with the category. |
| REF-015 | The procedure must anonymise data from the preprocessing, staging, production and audit schemas, and the IBM\_System database. |
| REF-016 | Store Right to Erasure request contact information separate to the Production data model. The following information should be stored for auditing proposes:   * KeyMappingID * Name * Address 1 - 5 * Postcode * Email * Mobile * Date of Request * Process Run Date * Executed by (Service delivery team) * Incident Number (Supplied by VT)   This information should be stored under a separate schema with reduced read access to users. The schema should be named GDPR and will have limited access. |
| REF-017 | The anonymisation technique will be where the value is an alpha value, to update the value in the field with the field name and the value ‘anonymised’;  i.e. ‘[fieldname] – Right to Erasure deletion’  Where the field is a numeric, update the values to 00000000123 (this will only be for mobile numbers). |
| REF-018 | The records lastupdatedate will be updated with the datestamp of when the RtE has occurred. |
| REF-019 | Insert the customer ID into the Blacklist table; staging.STG\_Blacklist. |

## Functional Process – Right to Erasure – Meta Data Table for Anonymisation

A table will be created to store the meta data required for RtE. The table will be named; GDPR.GDPRRtEMetaData

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Database** | **Table** | **FieldName** | **Relationship** | **Description** |
| CRM | Address | AddressLine1 | Retrieve CustomerID or IndividaulID from the ElectronicAddreess table, match customer.customerID, AddressID = AddressID | Address is unique at customer level, therefore there are multiple duplicate addresses within the address table relating to multiple unique individuals |
| CRM | Address | AddressLine1 |  |
| CRM | Address | AddressLine2 |  |
| CRM | Address | AddressLine3 |  |
| CRM | Address | AddressLine4 |  |
| CRM | Address | AddressLine5 |  |
| CRM | Address | TownCity |  |
| CRM | Address | County |  |
| CRM | Address | Postcode | Nullify the last paruk t of the postcode, to be left with the postcode sector i.e. CV31 1 |
| CRM | [Staging].[STG\_Customer] | Firstname | Match email to address in [CRM].[Staging].[STG\_ElectronicAddress] to retrieve customerID |  |
| CRM | [Staging].[STG\_Customer] | Surname |  |
| CRM | [Staging].[STG\_Customer] | Lastname |  |
| CRM | [Staging].[STG\_Customer] | DateOfBirth |  |  |
| CRM | [Staging].[STG\_Customer] | Salutation |  |  |
| CRM | [Staging].[CustomerLoyaltyAccount] | Title | Match on = Email to anonymise related fields |  |
| CRM | [Staging].[CustomerLoyaltyAccount] | Forename |  |
| CRM | [Staging].[CustomerLoyaltyAccount] | Surname |  |
| CRM | [Staging].[CustomerLoyaltyAccount] | Email |  |
| CRM | [Staging].[STG\_ElectronicAddress] | Address | Match subjects email address to retrieve CustomerID (once the customerid has been identified use it to anonymise both phone, email and nameadd values in the Address column) |  |
| CRM | [Staging].[STG\_ElectronicAddress] | ParsedAddress | CustomerID (once the customerid has been identified use it to anonymise both phone, email and nameadd values in the Address column) |  |
| CRM | [Staging].[STG\_Individual] | Salutation | Match subjects email address to [CRM].[Staging].[STG\_ElectronicAddress] to retrieve individaulID, use IndividualID to match to [Staging].[Individual].IndividualID |  |
| CRM | [Staging].[STG\_Individual] | Firstanem |  |
| CRM | [Staging].[STG\_Individual] | MiddleName |  |
| CRM | [Staging].[STG\_Individual] | Lastname |  |
| CRM | [PreProcessing.[BEAM\_Customer] | Firstname | Match email to ParsedEmail or EmailAddress fields to anonymise related values |  |
| CRM | [PreProcessing.[BEAM\_Customer] | Lastname |  |
| CRM | [PreProcessing.[BEAM\_Customer] | EmailAddress |  |
| CRM | [PreProcessing.[BEAM\_Customer] | ParsedAddressEmail |  |
| CRM | [PreProcessing.[BEAM\_Customer] | ParsedEmail |  |
| CRM | [PreProcessing].[CustomerPIIResponseTMP] | ParsedAddressEmail | Match email to ParsedEmail or EmailAddress fields to anonymise related values |  |
| CRM | [PreProcessing].[CustomerPIIResponseTMP] | CleanMobileNumber |  |
| CRM | [PreProcessing].[GranbyTraveller] | Title |  |
| CRM | [PreProcessing].[GranbyTraveller] | Forenames |  |
| CRM | [PreProcessing].[GranbyTraveller] | Surname |  |
| CRM | [PreProcessing].[GranbyTraveller] | Day\_telephone |  |
| CRM | [PreProcessing].[GranbyTraveller] | Evening\_Telephone |  |
| CRM | [PreProcessing].[GranbyTraveller] | Fax\_Num |  |
| CRM | [PreProcessing].[GranbyTraveller] | Email\_Address |  |
| CRM | [PreProcessing].[GranbyTraveller] | Address\_Line1 |  |
| CRM | [PreProcessing].[GranbyTraveller] | Address\_Line2 |  |
| CRM | [PreProcessing].[GranbyTraveller] | Address\_Line3 |  |
| CRM | [PreProcessing].[GranbyTraveller] | Address\_Line4 |  |
| CRM | [PreProcessing].[GranbyTraveller] | Address\_Line5 |  |
| CRM | [PreProcessing].[GranbyTraveller] | Postcode |  |
| CRM | [PreProcessing].[GranbyTraveller] | Home\_Company\_Names |  |
| CRM | [PreProcessing].[GranbyTraveller] | Work\_Address\_Line1 |  |
| CRM | [PreProcessing].[GranbyTraveller] | Work\_Address\_Line2 |  |
| CRM | [PreProcessing].[GranbyTraveller] | Work\_Address\_Line3 |  |
| CRM | [PreProcessing].[GranbyTraveller] | Work\_Address\_Line4 |  |
| CRM | [PreProcessing].[GranbyTraveller] | Work\_Address\_Line5 |  |
| CRM | [PreProcessing].[GranbyTraveller] | Work\_Address\_Postode |  |
| CRM | [PreProcessing].[GranbyTraveller] | Work\_Company\_Name |  |
| CRM | [PreProcessing].McLaren\_Wifi | Title | As there is no email address, match the requested email address to a known mobilenumber, and use the mobilenumber to remove data for McLaren |  |
| CRM | [PreProcessing].McLaren\_Wifi | Firstname |  |
| CRM | [PreProcessing].McLaren\_Wifi | Lastname |  |
| CRM | [PreProcessing].McLaren\_Wifi | MobilePhoneNumber |  |
| CRM | [PreProcessing].McLaren\_Wifi | Addressline1 |  |
| CRM | [PreProcessing].McLaren\_Wifi | Addressline2 |  |
| CRM | [PreProcessing].McLaren\_Wifi | City |  |
| CRM | [PreProcessing].McLaren\_Wifi | Postcode |  |
| CRM | [PreProcessing].McLaren\_Wifi | Country |  |
| CRM | [PreProcessing].McLaren\_Wifi | DateOfBirth |  |
| CRM | [PreProcessing].RailBlazers\_Data | Title | Match on =Email to annonymise related values |  |
| CRM | [PreProcessing].RailBlazers\_Data | Firstname |  |
| CRM | [PreProcessing].RailBlazers\_Data | Surname |  |
| CRM | [PreProcessing].RailBlazers\_Data | Company |  |
| CRM | [PreProcessing].RailBlazers\_Data | Addressline1 |  |
| CRM | [PreProcessing].RailBlazers\_Data | Addressline2 |  |
| CRM | [PreProcessing].RailBlazers\_Data | TownCity |  |
| CRM | [PreProcessing].RailBlazers\_Data | Postcode |  |
| CRM | [PreProcessing].RailBlazers\_Data | ContactNumber |  |
| CRM | [PreProcessing].RailBlazers\_Data | Email |  |
| CRM | [PreProcessing].TOC\_Customer | Country | Match on =EmailAddress to anonymise related values |  |
| CRM | [PreProcessing].TOC\_Customer | CompanyName |  |
| CRM | [PreProcessing].TOC\_Customer | AddressLine1 |  |
| CRM | [PreProcessing].TOC\_Customer | AddressLine2 |  |
| CRM | [PreProcessing].TOC\_Customer | AddressLine3 |  |
| CRM | [PreProcessing].TOC\_Customer | AddressLine4 |  |
| CRM | [PreProcessing].TOC\_Customer | AddressLine5 |  |
| CRM | [PreProcessing].TOC\_Customer | Town |  |
| CRM | [PreProcessing].TOC\_Customer | County |  |
| CRM | [PreProcessing].TOC\_Customer | Postcode |  |
| CRM | [PreProcessing].TOC\_Customer | Forename |  |
| CRM | [PreProcessing].TOC\_Customer | Surname |  |
| CRM | [PreProcessing].TOC\_Customer | Salutation |  |
| CRM | [PreProcessing].TOC\_Customer | Title |  |
| CRM | [PreProcessing].TOC\_Customer | EveningTelephoneNo |  |
| CRM | [PreProcessing].TOC\_Customer | DayTelephoneNo |  |
| CRM | [PreProcessing].TOC\_Customer | MobiletelephoneNo |  |
| CRM | [PreProcessing].TOC\_Customer | FaxTelephone |  |
| CRM | [PreProcessing].TOC\_Customer | EmailAddress |  |
| CRM | [PreProcessing].TOCPlus\_Customer | EmailAddress | Match on =EmailAddress to anonymise related field |  |
| CRM | [PreProcessing].TOCPlus\_Customer | Dateofbirth |  |
| CRM | [PreProcessing].TOCPlus\_Customer | CompanyName |  |
| CRM | [PreProcessing].TOCPlus\_Customer | AddressLine1 |  |
| CRM | [PreProcessing].TOCPlus\_Customer | AddressLine2 |  |
| CRM | [PreProcessing].TOCPlus\_Customer | AddressLine3 |  |
| CRM | [PreProcessing].TOCPlus\_Customer | AddressLine4 |  |
| CRM | [PreProcessing].TOCPlus\_Customer | AddressLine5 |  |
| CRM | [PreProcessing].TOCPlus\_Customer | Postcode |  |
| CRM | [PreProcessing].TOCPlus\_Customer | Country |  |
| CRM | [PreProcessing].TOCPlus\_Customer | DayPhone |  |
| CRM | [PreProcessing].TOCPlus\_Customer | EveningPhone |  |
| CRM | [PreProcessing].TOCPlus\_Customer | Title |  |
| CRM | [PreProcessing].TOCPlus\_Customer | Forename |  |
| CRM | [PreProcessing].TOCPlus\_Customer | Surname |  |
| CRM | [PreProcessing].TOCPlus\_Customer | MobiletelephoneNo |  |
| CRM | [PreProcessing].TOCPlus\_Customer | ParsedEmail |  |
| CRM | [PreProcessing].TOCPlus\_Customer | ParsedAddressMobile |  |
| CRM | [PreProcessing].TOCPLUS\_Customer\_tmp | EmailAddress |  |
| CRM | [PreProcessing].TOCPLUS\_Customer\_tmp | Dateofbirth |  |
| CRM | [PreProcessing].TOCPLUS\_Customer\_tmp | CompanyName |  |
| CRM | [PreProcessing].TOCPLUS\_Customer\_tmp | AddressLine1 |  |
| CRM | [PreProcessing].TOCPLUS\_Customer\_tmp | AddressLine2 |  |
| CRM | [PreProcessing].TOCPLUS\_Customer\_tmp | AddressLine3 |  |
| CRM | [PreProcessing].TOCPLUS\_Customer\_tmp | AddressLine4 |  |
| CRM | [PreProcessing].TOCPLUS\_Customer\_tmp | AddressLine5 |  |
| CRM | [PreProcessing].TOCPLUS\_Customer\_tmp | Postcode |  |
| CRM | [PreProcessing].TOCPLUS\_Customer\_tmp | Country |  |
| CRM | [PreProcessing].TOCPLUS\_Customer\_tmp | DayPhone |  |
| CRM | [PreProcessing].TOCPLUS\_Customer\_tmp | EveningPhone |  |
| CRM | [PreProcessing].TOCPLUS\_Customer\_tmp | Title |  |
| CRM | [PreProcessing].TOCPLUS\_Customer\_tmp | Forename |  |
| CRM | [PreProcessing].TOCPLUS\_Customer\_tmp | Surname |  |
| CRM | [PreProcessing].TOCPLUS\_Customer\_tmp | MobiletelephoneNo |  |
| CRM | [PreProcessing].TOCPLUS\_Customer\_tmp | ParsedEmail |  |
| CRM | [PreProcessing].TOCPLUS\_Customer\_tmp | ParsedAddressMobile |  |
| CRM | [PreProcessing].TOCPlus\_NAS\_Pull\_Response | EmailAddress | Match on EmailAddress to annoymise related field |  |
| CRM | [PreProcessing].TOCPlus\_NAS\_Pull\_Response | Name |  |
| CRM | [PreProcessing].TOCPlus\_NAS\_Push\_Response | EmailAddress | Match on EmailAddress to annoymise related field |  |
| IBM\_System | [CRM\_RT].dbo.[API\_ElectronicAddress] | ParsedAddress | Match on ParsedAddress to annoymise related field |  |
| IBM\_System | [CRM\_RT].[api\_customer].[BeamCustomer] | Firstname | Match on Email to annoymise related field |  |
| IBM\_System | [CRM\_RT].[api\_customer].[BeamCustomer] | Surname |  |  |
| IBM\_System | [CRM\_RT].[api\_customer].[BeamCustomer] | Email |  |  |
| ibm\_system | [ibm\_system].[dbo].[SMS\_OptOut] | Number | Match subjects email address to [CRM].[Staging].[STG\_ElectronicAddress] to retrieve Mobilenumber, use Mobilenumber to match to [ibm\_system].[dbo].[SMS\_OptOut].number |  |
| ibm\_system | [ibm\_system].[dbo].[SMS\_Response] | Number | Match subjects email address to [CRM].[Staging].[STG\_ElectronicAddress] to retrieve Mobilenumber, use Mobilenumber to match to [ibm\_system].[dbo].[SMS\_Response].number |  |
| Ibm\_system | [ibm\_system].[dbo].[SMS\_Sent] | Number | Match subjects email address to [CRM].[Staging].[STG\_ElectronicAddress] to retrieve Mobilenumber, use Mobilenumber to match to [ibm\_system].[dbo].[SMS\_Sent].number |  |
| Ibm\_system | [ibm\_system].[dbo].[SP\_Attachment] | Email | Match on Email |  |
| Ibm\_system | [ibm\_system].[dbo].[SP\_BounceReply] | Email | Match on Email |  |
| Ibm\_system | [ibm\_system].[dbo].[SP\_Click] | Email | Match on Email |  |
| Ibm\_system | [ibm\_system].[dbo].[SP\_Conversion] | Email | Match on Email |  |
| Ibm\_system | [ibm\_system].[dbo].[SP\_EmailInsights] | Email | Match on Email and annoymise the relevant fields |  |
| Ibm\_system | [ibm\_system].[dbo].[SP\_EmailInsights] | Title |  |
| Ibm\_system | [ibm\_system].[dbo].[SP\_EmailInsights] | Surname |  |
| Ibm\_system | [ibm\_system].[dbo].[SP\_EmailInsights\_STG] | Email | Match on Email and annoymise the relevant fields |  |
| Ibm\_system | [ibm\_system].[dbo].[SP\_EmailInsights\_STG] | Title |  |
| Ibm\_system | [ibm\_system].[dbo].[SP\_EmailInsights\_STG] | Surname |  |
| Ibm\_system | [ibm\_system].[dbo].[SP\_EmailOptOut] | Email | Match on Email |  |
| Ibm\_system | [ibm\_system].[dbo].[SP\_Forward] | Email | Match on Email |  |
| Ibm\_system | [ibm\_system].[dbo].[SP\_Open] | Email | Match on Email |  |
| Ibm\_system | [ibm\_system].[dbo].[SP\_OptIn] | Email | Match on Email |  |
| Ibm\_system | [ibm\_system].[dbo].[SP\_OptOut] | Email | Match on Email |  |
| Ibm\_system | [ibm\_system].[dbo].[SP\_Sent] | Email | Match on Email |  |
| Ibm\_system | [ibm\_system].[dbo].[SP\_Suppressed] | Email | Match on Email |  |
| Ibm\_system | [ibm\_system].[dbo].[SP\_WCAMaster] | Email | Match on Email |  |

## Functional Process – Right to Erasure - Visual Overview Data Flow



## Considerations, Dependencies and Constraints – Right to Erasure

|  |  |
| --- | --- |
| **Ref** | **Description** |
| CCD-001 | Where Merkle has shared an individual’s information with a 3rd party such as Go-media, the Data Controller (VT) should inform the 3rd party to remove the information, that is if the contract is with the Data Controller and the 3rd party. |
| CCD-002 | The steps will be repeated on all environments;  AEW1VTWCSQL92.PCLCO.MERKLE.LOCAL - DEV  AEW1VTWCSQL90.PCLCO.MERKLE.LOCAL - TEST  AEW1VTWCSQL01.PCLCO.MERKLE.LOCAL – PROD |
| CCD-003 | Depending on how long source files are retained for, the individual’s details will also need to be removed from the source files. It is the responsibility of the Data Controller to advise Merkle on which files the individual’s details were received in, in order to manually remove the records from the file within the file system. |
| CCD-004 | The newly anonymised values (for those that we supply to VT) will be supplied to VT in the ABI feed. This will happen automatically and does not any additional development. |
| CCD-005 | Due to time constraints the data catergorisation matrix has not been developed and won’t be by the time development has been completed on this deliverable. However, once the data categorisation matrix has been defined and populated, the RtE should been updated to reference it. |
| CCD-006 | For both, RtE and RtA, when communicating back to the client, via the Jira ticket, there are a set of questions that must be answered. This is a confirmation to the client that Merkle have actioned the subjects request. It is Service Deliveries responsibility to fulfil this request. |

## Functional Process – Right to Access (RtA)

The following section outlines the functional approach to fulfil the RtA requirements.

The data will be uploaded to Box (a file sharing service used throughout rail network) by VT for manual extract by Merkle. VT send Merkle Service Delivery a notification to [-Service\_Deliver@merkleinc.com](mailto:Dbg-Service_Deliver@merkleinc.com) to confirm that a file has been uploaded for processing.

Merkle Service Delivery team will raise the Jira Service desk case under the GDPR Service Desk Project and email VT

|  |  |
| --- | --- |
| **Ref** | **Description** |
| REF-001 | The Stored Procedure will be executed by populating a variable. The variable will be email address, as this is what has been agreed with the client as the primary match key. |
| REF-002 | The layout for the inbound file will be as follows and will be supplied with a header;   |  |  |  | | --- | --- | --- | | **Field\_Name** | **Field\_Data\_type** | **Business Rules** | | Incident Number | numeric | This is Virgin Trains own internal reference number. | | Data Subject Name | Varchar |  | | Email Address | Varchar |  | | Postcode | Varchar |  | | Date Added To Tracker | Date |  | |
| REF-003 | The inbound file naming convention is as following; VTWC\_SAR\_DDMMYYYY.csv |
| REF-004 | The Stored Procedure will support the ability to extract multiple subjects in a given extract. |
| REF-005 | The process will be executed manually once the files has been copied to the file system but the Service Engineer. The process will be govered by a SQL Agent job, GDPRRightToAccess. |
| REF-006 | The Stored Procedure will support one time manual execution. This means that the Service Delivery team need the relevant permissions to execute the code. |
| REF-007 | The Stored Procedure will extract data to a table; GDPRRightToAccessExtract |
| REF-008 | The process must support both Customer and Individuals |
| REF-009 | The following feeds are required for extract – Following details [here](#_File_Layout_–);  CustomerID or IndividualID  CustomerRecordLastUpdateDate  EmailAddress  MobileNumber  Name  AddressLine1  AddressLine2  AddressLine3  AddressLine4  AddressLine5  Towncity  County  PostalCode  BlackList  SourceOfLatestPermission  EmailOptin  SMSOptin  MailOptin  General Marketing Opt-In  Retailer Marketing Opt-In  DFT Opt-In  Third party marketing Opt-In  Third party Opt-Out  Credit Opt-In  Campaign Opt-In  Sitecore Opt-In  LegitimateInterest |
| REF-010 | Once the Stored Procedure has completed, the information must be audited. Therefore, the customerID must be persited in a separate table; RightToAccessExtractAudit |
| REF-011 | An SSIS package will extract the results to the following file system location for the Service Delivery team to manually upload it to Box. |

## Functional Process – Right to Access - Visual Overview Data Flow



## Considerations, Dependencies and Constraints – Right to Access

|  |  |
| --- | --- |
| **Ref** | **Description** |
| CCD-001 | The service delivery team will perform the necessary communications with the client to inform them that the process has completed |
| CCD-002 | For both, RtE and RtA, when communicating back to the client, via the Jira ticket, there are a set of questions that must be answered. This is a confirmation to the client that Merkle have actioned the subjects request. It is Service Deliveries responsibility to fulfil this request. |

## Data Dictionary – Right to Access

|  |  |  |  |
| --- | --- | --- | --- |
| **Feed Details** | | | |
| **Feed ID/#:** | 1 | **Feed Format** | Delimited |
| **Feed Name** | GDPR Right to Access Outbound (Virgin Train Return Feed) | **Field Delimiter** | | (Pipe) |
| **Feed Source** | Phoenix CRM (Merkle) | **Record Delimiter** | LF |
| **Frequency** | Daily | **Header/Footer/Both** | Header |
| **Input/Output** | Output | **Text Qualifiers** | Yes |
| **Output Recipient** | Virgin Trains | **Encryption** | Other |
| **CDI Processing** |  | **Delivery Mechanism** | SFTP |
| **Update Critical** |  | **File Location** | Inbound |
| **Incremental / Full Refresh** | Incremental | **Contact Information** | Virgin Trains - Matt Hey |
| **Physical File Naming Convention** | VTWC\_SAR\_Completed\_DDMMYYYY.csv | **Count file received** | No |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Field\_Name** | **Field\_Description** | **Mapping** | **Field\_Data\_type** | **Business Rules** |
| CustomerID or IndividualID |  | [CRM].[Staging].[STG\_Customer].CustomerID  Or  CRM].[Staging].[STG\_Individual].IndividualID | Int |  |
| CustomerRecordLastUpdateDate | LastUpdatedDate | [CRM].[Staging].[STG\_Customer].LastModifiedDate | Datetime |  |
| EmailAddress |  | [CRM].[Staging].[STG\_ElectronicAddress].Address | Varchar | PrimaryInd=1 |
| MobileNumber |  | [CRM].[Staging].[STG\_ElectronicAddress].Address | Int | PrimaryInd=0 |
| Name |  | [CRM].[Staging].[STG\_Customer].Salutation+[CRM].[Staging].[STG\_Customer].Firstname+[CRM].[Staging].[STG\_Customer].Lastname | Varchar |  |
| AddressLine1 |  | [CRM].[Staging].[STG\_Address].AddressLine1 | Varchar | =customerID or IndividaulID |
| AddressLine2 |  | [CRM].[Staging].[STG\_Address].AddressLine2 | Varchar |  |
| AddressLine3 |  | [CRM].[Staging].[STG\_Address].AddressLine3 | Varchar |  |
| AddressLine4 |  | [CRM].[Staging].[STG\_Address].AddressLine4 | Varchar |  |
| AddressLine5 |  | [CRM].[Staging].[STG\_Address].AddressLine5 | Varchar |  |
| TownCity |  | [CRM].[Staging].[STG\_Address].Town | Varchar |  |
| County |  | [CRM].[Staging].[STG\_Address].County | Varchar |  |
| PostalCode |  | [CRM].[Staging].[STG\_Address].PostalCode | Varchar |  |
| BlackList |  | [CRM].[Staging].[STG\_Blacklist] | Boolean |  |
| SourceOfLatestPermission |  | [CRM].[Staging].[STG\_CustomerPreference].LastModifiedBy | Datetime |  |
| EmailOptin |  | [CRM].[Staging].[STG\_CustomerPreference].ChannelID | Boolean | Channel = 2 |
| SMSOptin |  | [CRM].[Staging].[STG\_CustomerPreference].ChannelID | Boolean | Channel = 3 |
| MailOptin |  | [CRM].[Staging].[STG\_CustomerPreference].ChannelID | Boolean | Channel = 4 |
| General Marketing Opt-In |  | [CRM].[Staging].[STG\_CustomerPreference].PreferenceID | Boolean | PreferenceID = 1 |
| Retailer Marketing Opt-In |  | [CRM].[Staging].[STG\_CustomerPreference].PreferenceID | Boolean | PreferenceID = 2 |
| DFT Opt-In |  | [CRM].[Staging].[STG\_CustomerPreference].PreferenceID | Boolean | PreferenceID = 3 |
| Third party marketing Opt-In |  | [CRM].[Staging].[STG\_CustomerPreference].PreferenceID | Boolean | PreferenceID = 4 |
| Third party Opt-Out |  | [CRM].[Staging].[STG\_CustomerPreference].PreferenceID | Boolean | PreferenceID = 5 |
| Credit Opt-In |  | [CRM].[Staging].[STG\_CustomerPreference].PreferenceID | Boolean | PreferenceID = 6 |
| Campaign Opt-In |  | [CRM].[Staging].[STG\_CustomerPreference].PreferenceID | Boolean | PreferenceID = 7 |
| Sitecore Opt-In |  | [CRM].[Staging].[STG\_CustomerPreference].PreferenceID | Boolean | PreferenceID = 8 |
| LegitimateInterest |  | (has not been developed) |  |  |
| PurposeForProcessing |  | =”Marketing” |  |  |