How to Document

General Data Protection Regulation – Subject Access Requests (GDPR - SAR)

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# Document Summary

This document provides an overview of GDPR SAR project and explains the steps to handle the SARs of the users using the RPA tool blue prism. This document also explains the instructions on how to install the solution and use it. Instructions for high level debugging is also outlined in this document.

# Introduction

**What is a SAR?**

SAR stand for Subject Access Request. As per regulation in EU law Individuals (usually an employee) have the right to information from their organisation (usually an employer) whether they are processing personal data of an individual or not, if so, it is to be disclosed.

The General Data Protection Regulation (EU) 2016/679 (GDPR) is a regulation in EU law on data protection and privacy for all individual citizens of the European Union (EU) and the European Economic Area (EEA). It also addresses the transfer of personal data outside the EU and EEA areas.

Under the GDPR, individuals have the right to obtain confirmation that their data is being processed and access to their personal data. A Subject Access Request (SAR) is the statuary mechanism by which individuals may exercise these rights to access their personal data and verify the lawfulness of the processing.

# Problem Statement

To handle the Subject Access Requests (SARs) effectively within the allowed and legal timeframe is a challenge for most of the employers. The amount of information held about individual (wherever in Organization and in whichever form like personnel file, internal memorandums, meeting notes or simply email correspondence) can be vast. Understanding from the outset how to respond to an SAR is crucial because failing to respond can expose the business to a claim, fines, enforcement action and reputational damage.

# The Solution

**RPA Solution for Catering SARs**:

To serve the SARs, a solution/process using RPA tool Blue Prism, is built. The process (so called BOT) accesses a master spreadsheet containing user’s email and/or other details (if provided) which is kept at the location where BOT can access it. Then the BOT iterate through all the rows of spreadsheet one by one, queries database table(s) to fetch the user’s details and share the fetched details with user (requestor) via email. Finally, a report is shared with Controller of the process to inform about the status of the SARs to state if details were found or not with-in organization’s database (this report is optional, which can be switched off by changing an Environment Variable).

# Scope

This section describes the scope of the project at a high level.

## In Scope

The following areas are in scope for this project:

* Individual’s details stored in SQL database tables

## Out of Scope

The following areas are out of scope for this project:

* Individual’s details stored in other sources than SQL Database like personnel file, internal memorandums, meeting notes or email correspondence

# How to Setup

## Prerequisites

* Blue Prism RPA tool must be pre-installed on the Run Time Resource (where BOT will run)
* Blue Prism tool must be installed and configured on Interactive Client (the machine from where BOT will be managed)
* POP3 and SMTP protocols must be available in order to send emails

## Setup

### Import Release

### Download “gdprsar.bprelease” file from github location <Repository URL>

* Import the .bprelease file in Blue prism

### Set Environment Variables

The value of below Environment Variables (EVs) must be provided/updated as per below table by navigating to System -> Processes -> Environment Variables, in blue prism

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Environment Variable  Name | Type of Field | Description | Sample Value (example) | Note |
| GUD\_Excel Path | Text - Mandatory | Path of the spreadsheet containing user data for whom SAR is to be catered | C:\GDPRSAR\master.xlsx | Provide the path of the .xlsx file having user details like User Email etc. |
| GUD\_Excel Sheet Name | Text - Conditional | Sheet (tab) name with-in the spreadsheet | Data | Mandatory if having more than one sheets with-in spreadsheet  Optional if spreadsheet is having only one sheet within it |
| GUD\_Folder Archive Path | Text - Mandatory | Path of the folder where files (like report, .xlsx file etc.) will be archived after processing | C:\GDPRSAR\Archived\ | Place backward slash (\) at the end of the value |
| GUD\_From Email Credential Name | Text - Mandatory | Credential Name for the user through which email will be sent | GUD\_From Email | Credential with the same name as provided in “Sample Value” and with valid Username/Password must be created under System -> Credentials |
| GUD\_Report Flag | Flag - Mandatory | Whether to send report to Controller | True | If set to true BOT will send a report to Controller of the process, if set to False, it will not |
| GUD\_Controller Email ID | Text - Mandatory | Email id whom to be contacted in case of any exception/report | [gdpsar-controller@company.com](mailto:gdpsar-controller@company.com) | If more than one email id, enter with comma separated values like [a@abc.com](mailto:a@abc.com), [b@abc.com](mailto:b@abc.com) , |
| GUD\_Configure Email SMTP Server | Text - Mandatory | Email Server name, from where email will be sent | server.company.com | POP3/SMTP email server name |
| GUD\_Configure Email Server Port | Number - Mandatory | Email Server Port | 10 | Port Number |
| GUD\_Configure Email Use SSL Flag | Flag - Mandatory | Use SSL Flag | False | Set it as False |
| GUD\_Database Credential Name | Text - Mandatory | Name of the Database Credentials | GUD\_Database Credentials | Credential with the same name as provided in “Sample Value” and with valid Username/Password must be created under System -> Credentials |
| GUD\_Database Server | Text - Mandatory | Database Server where Database resides | databaseserver. amazonaws.com | Database Server where Database resides |
| GUD\_Database Name | Text - Mandatory | Name of the database on the server | EmployeeData | Database Name |
| GUD\_Database Tables | Text - Mandatory | Comma separated table names, where the data will be fetched from | Employees, Departments, PersonalDetails | Comma separated table names, where the data will be fetched from |
| GUD\_Database Table Fields | Text - Mandatory | Comma separated name of the fields **with table name** | Employees.Name, Employees.DOB Departments.Role, PersonalDetails.Email, PersonalDetails.City, PersonalDetails.Address | Must be in the sequence how table names in “GUD\_Database Tables” environment variable, are mentioned i.e. “Employee” table is appearing first, the field(s) from it must be entered first  Likewise, then from Departments and then PersonalDetails tables |
| GUD\_Database Tables Criterias | Text - Mandatory | Comma separated table criteria according to which the data from two tables will be extracted | Employees.ID = PersonalDetails.ID, Departments.ID = PersonalDetails.ID | Must be in sequence how table names in “GUD\_Database Tables” environment variable, are mentioned |
| GUD\_User Email Field in Database Table | Text - Mandatory | Table Column name in which requestor user's email address is stored in TableName.ColumnName format | PersonalDetails.Email | Table Column name in which requestor user's email address is stored in TableName.ColumnName format |

# Instructions

It is recommended to follow below instructions about the spreadsheet having user emails:

1. Keep the column names of the spreadsheet in format of TableName.FieldName like PersonalDetails.Email
2. More than one column can be entered in the spreadsheet, if needed like PersonalDetails.Email, PersonalDetails.FirstName

# Document History

This section details the history of the document at each version. It’s good to know what has changed in each version, by who, and when it happened.

|  |  |  |  |
| --- | --- | --- | --- |
| **Version** | **Date** | **Changes** | **Author** |
| 1.0 | 07-Nov-2019 | Draft Version | Ram Niwas Verma |