



akuiteo
BUSINESS SOFTWARE

General Guide

PERSONAL DATA MANAGEMENT IN AKUITEO

Version 4.3

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Table of Contents

1 Preface	4
1.1 Revisions	4
1.2 Help Desk	4
2 Introduction	5
2.1 Access rights	5
3 Getting ready for the EU GDPR	7
3.1 Personal data usage	7
3.1.1 Impacted modules	7
3.1.2 Non-personal data that can become personal depending on their usage	7
3.1.3 Personal data that are confidential by default	7
3.2 Good practices	7
3.2.1 Rights management	7
3.2.2 Custom data management	8
3.2.3 Database access management	9
4 Employee record sheet	10
4.1 From the 3.7 version onwards	10
4.2 From the 4.1 version onwards	10
5 Contact record sheet	12
5.1 From the 3.7 version onwards	12
5.2 From the 4.1 version onwards	12
6 Anonymization process to ensure the right to be forgotten	14
6.1 Record sheets to be anonymized	14
6.2 Anonymization batch	14
6.2.1 Prerequisites	14
6.2.2 Batch execution	15
7 Other impacted modules	17
7.1 Document record sheet	17
7.2 Supplier record sheet	18
7.3 Event record sheet	18
7.4 Marketing target	18
7.5 CRM query	19

1 Preface

1.1 REVISIONS

Revision 1

Published in April 2020

1.2 HELP DESK

Akuiteo S.A.S. highly values your satisfaction.

To share your feedback or contact the help desk, feel free to visit our website page:

<https://www.akuiteo.fr/akuiteo.clients/>

2 Introduction

The Regulation of the European Parliament and of the Council sets rules to protect individuals with regard to the processing of personal data and the free movement of such data. This regulation repeals the Directive 95/46/EC. Akuiteo adapts to the EU General Data Protection Regulation (GDPR) by bringing security to personal data management inside the Akuiteo software.

References

For more information about the EU GDPR, refer to the CNIL website: <https://www.cnil.fr/en/home>

For visual explanations, refer to: https://ec.europa.eu/justice/smedataprotect/index_en.htm

To help you prepare for the GDPR, Akuiteo gives you key elements to correctly set up the software as well as manage your personal data use to comply with the GDPR.

For your GDPR road map, you need to:

- make an inventory of your personal data usage;
- check your setup to give access to such data only to the relevant people, since most of the personal data contained in Akuiteo are about employees and contacts.

There are two types of setup available:

- the setup options that are available from the 3.7 version onwards to manage personal data inside Akuiteo;
- the evolutions available from the 4.1 version onwards to help you manage personal data more securely and to easily implement the right to be forgotten.

2.1 ACCESS RIGHTS

The following DMFs are required to use some of the features that help protect personal data in the Akuiteo modules:

DMF 040132	Access employee record sheets, see Supplier record sheet (p. 18)
DMF 040650	Access supplier employees' invoices and credit notes, see Supplier record sheet (p. 18)
DMF 041504	Search for expense reports, see From the 3.7 version onwards (p. 10)
DMF 060204	Search for schedules, see From the 3.7 version onwards (p. 10)
DMF 060245	Display leave types in schedules, see From the 3.7 version onwards (p. 10)
DMF 060304	Search for timesheets, see From the 3.7 version onwards (p. 10)
DMF 100119	Access documents marked as containing personal data, see Document record sheet (p. 17)
DMF 100120	Marking documents containing personal data (p. 17)

Table 1: DMFs required to protect personal data

DMF 100121	Marking multiple documents containing personal data at once (p. 18)
DMF 100708	Enable Excel export when the BLOK_EXP_EX management rule is active, see Excel export features (p. 8)
DMF 160204	Search for leave requests, see From the 3.7 version onwards (p. 10)
DMF 160414	Export contact details in Excel format, see Excel export features (p. 8)
DMF 160417	Marking a contact record sheet as "to be anonymized" (p. 12)
DMF 160418	Marking multiple contact record sheets as "to be anonymized" at once (p. 13)
DMF 160419	Access the Personal contact details tab in the contact record sheet, see Specific DMFs (p. 13)
DMF 160420	Access contacts' personal data, see Specific DMFs (p. 13)
DMF 160816	Export employee details in Excel format, see Excel export features (p. 8)
DMF 160869	Marking an employee record sheet as "to be anonymized" (p. 10)
DMF 160870	Marking multiple employee record sheets as "to be anonymized" at once (p. 11)

Table 1: DMFs required to protect personal data

3 Getting ready for the EU GDPR

3.1 PERSONAL DATA USAGE

3.1.1 Impacted modules

Employee and contact record sheets are inevitably impacted since they contain professional and personal information about individuals. However, other modules can be impacted as well depending on your company's personal data usage.

3.1.2 Non-personal data that can become personal depending on their usage

Custom data

You can choose to set up some custom data to contain personal data. For example, you can choose to add custom fields to employee or contact record sheets: specific HR data in the employee record sheet, additional business information about a contact, additional details about a person.

If some custom data contain personal data, you need to control who can access these data.

Note

Custom data are not taken into account for the anonymization process during the batch execution.

Linked documents

You can choose to use some generic Akuiteo modules to contain personal data. For example, you can choose to attach personal documents (such as a resume) or events to an employee record sheet. You need to control who can access these documents and events with authorization levels, or restrict the access to a list of designated employees.

3.1.3 Personal data that are confidential by default

Users with the required rights to access the employee and contact modules are the only ones allowed to see the confidential data. By default, these data are not displayed, even if a user can access other modules. A newly created Akuiteo user with no defined access rights cannot see these personal data.

3.2 GOOD PRACTICES

3.2.1 Rights management

In Akuiteo, user profiles enable to control the access to personal data for users. You must check and change the access rights if personal data can be accessed by unauthorized users.

The access rights' codes are named DMFs (Domain-Module-Function).

Super administrator profile

A super administrator profile has all the access rights available for all the data included in Akuiteo, without restriction. You must only assign this profile to users that are allowed to access all types of personal data.

To find profiles with the super administrator type in the setup:

- 1 Open **General setup > Security > User profile management**.
- 2 Search for profiles.
- 3 In the search results, identify the profiles marked as having **All DMFs**.

You can then reduce to a strict minimum the number of users with these super administrator profiles from **General setup > Security > User management**.

Excel export features

All of the tables available in Akuiteo can be exported in Excel format. You must check if unauthorized users can have access to personal data via Excel export.

To limit the number of users who can export tables in Excel format:

- Check the user profiles with the following DMFs:
 - 160414 to export contact details;
 - 160816 to export employee details.
- If the **BLOK_EXP_EX** management rule is active, it is impossible for users to export any type of tables in Excel format unless they have the DMF 100708 to bypass this management rule. When the rule is active, the DMFs 160414 and 160816 are inactive.

3.2.2 Custom data management

It is possible to control the access to custom data containing personal information. To do so, DMFs must be set up and assigned to the sequences of these custom data from the following menus:

- **General setup > Resources and Labor > Custom resources data (Employees and subcontractors)**
- **General setup > Sale > Custom contact data**

To control the use of custom data for employees and contacts:

- 1 Identify the custom data containing personal information.
- 2 Set up a new DMF for the sequence of data containing personal information.
- 3 Assign this new DMF only to the relevant users.

Note

If non-personal data are included in a sequence protected by a DMF, contact your Akuiteo interlocutor to move the custom data in the database and relocate them to a sequence without DMF. In this case, renaming the setup of a custom data does not move the database values from one sequence to another: it is necessary to technically migrate these data using scripts.

3.2.3 Database access management

Check with your CIO that the access to the database containing Akuiteo data is secured. Make sure to use individual accounts (with a login and a password) to access this database.

4 Employee record sheet

The following features are available in the employee record sheet to help protect the personal and professional data of your employees, identified during the inventory of your personal data usage.

4.1 FROM THE 3.7 VERSION ONWARDS

It is possible to control the access to employee record sheets in order to prevent users from accessing personal data:

- The DMFs starting with 1608 enable users to access and edit the different sections of an employee record sheet. The access to an employee record sheet from the search results can also be controlled.
- The DMF 160816 enables to export employee details in Excel format. This DMF must only be assigned to users with the right to access employees' personal data.
- Some employee-related data can be considered as personal data. User profiles with the following DMFs must be checked to control search rights:
 - 041504 for expense reports;
 - 060204 for schedules;
 - 060304 for timesheets;
 - 160204 for leave requests.

The **PLG_MASQUER_ABS** management rule can be activated to hide labels of projects, phases, sub-phases and tasks from team schedules, so that leave types remain private. If the rule is active, leave types are only displayed to users with the DMF 060245.

4.2 FROM THE 4.1 VERSION ONWARDS

An employee who is no longer part of the company can be marked as "to be anonymized". Using a specific anonymization batch, all the personal data (name, first name, phone numbers, email addresses, bank details, photographs, and so on) included in all employee record sheets marked as "to be anonymized" will be permanently anonymized. The record sheets are kept but the personal data is emptied or is replaced by a random value if a field is required.

Marking an employee record sheet as "to be anonymized"

The DMF 160869 is required to mark an employee record sheet as "to be anonymized". A record sheet can only be anonymized if the employee is no longer active in the company, meaning the departure date is filled in.

From the desired employee record sheet, click **Edit > Mark as "to be anonymized"** then click **Yes** to confirm.

➡ The "To be anonymized" indicator is added in the record sheet's header.

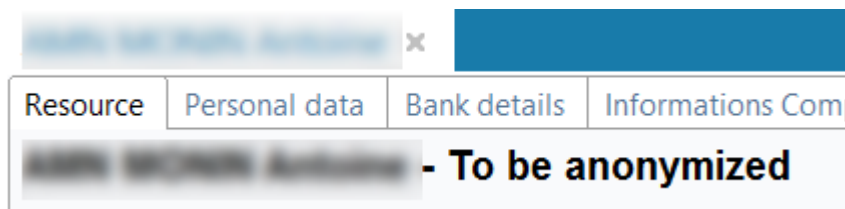


Image 1: Employee record sheet marked as "to be anonymized"

As long as the record sheet has not been anonymized, meaning as long as the anonymization batch has not been executed, the "To be anonymized" marking can be removed by clicking **Edit > Cancel "to be anonymized"**.

When the record sheet is anonymized, the **Anonymized on** field is displayed in the **Identity** section. This field cannot be modified and is only displayed after a record sheet has been anonymized. This field is automatically filled in during the anonymization batch execution.

Marking multiple employee record sheets as "to be anonymized" at once

From the employee search results, multiple employee record sheets can be marked as "to be anonymized" at once. The DMF 160870 is required to do so. Select multiple employees, then right-click on the selection and click **Administration > Mark as "to be anonymized"**.

To remove this marking, select multiple employees, then right-click on the selection and click **Administration > Cancel "to be anonymized"**.

Searching for employees

Search criteria are available in the **Types** section of the employee search:

Field	Description
Radio button: All/To be anonymized/Not to be anonymized	<p>All: search results include both employees that are marked as "to be anonymized" and employees that have no marking.</p> <p>To be anonymized: search results only include employees that are marked as "to be anonymized".</p> <p>Not to be anonymized: search results only include employees that have no marking.</p>
Anonymized between xxx and yyy	Enables to search for employee record sheets that were anonymized over a given period of time.

5 Contact record sheet

The following features are available in the contact record sheet to help protect the personal and professional data of your contacts, identified during the inventory of your personal data usage.

5.1 FROM THE 3.7 VERSION ONWARDS

It is possible to protect the personal data included in a contact record sheet by using the following setup options:

- Custom data can be created to contain contact details and can be protected using a DMF.
- The DMF 160414 enables to export contact details in Excel format. This DMF must only be assigned to users with the right to access contacts' personal data.
- If specific fields of the contact record sheet must be kept private, custom controls can be created to only display these fields to users with the appropriate profiles and rights.

5.2 FROM THE 4.1 VERSION ONWARDS

A contact declared as lost can be marked as "to be anonymized". Using a specific anonymization batch, all the personal data (name, first name, phone numbers, email addresses, bank details, photographs, and so on) included in all contact record sheets marked as "to be anonymized" will be permanently anonymized. The record sheets are kept but the personal data is emptied or is replaced by a random value if a field is required.

Marking a contact record sheet as "to be anonymized"

The DMF 160417 is required to mark a contact record sheet as "to be anonymized". A record sheet can only be anonymized if the contact is declared as lost, with a loss date earlier than the current date.

From the desired contact record sheet, click **Edit** > **Mark as "to be anonymized"** then click **Yes** to confirm.

↳ The "To be anonymized" indicator is added in the record sheet's header.

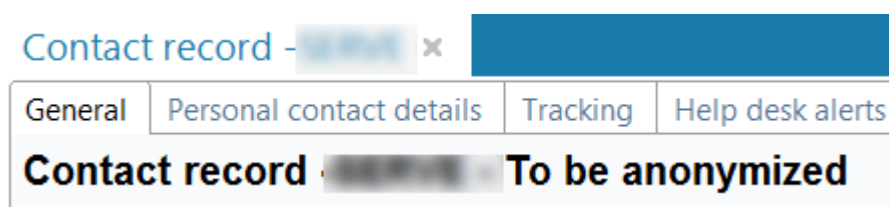


Image 2: Contact record sheet marked as "to be anonymized"

As long as the record sheet has not been anonymized, meaning as long as the anonymization batch has not been executed, the "To be anonymized" marking can be removed by clicking **Edit** > **Cancel "to be anonymized"**.

When the record sheet is anonymized, the **Anonymized on** field is displayed in the **Identity** section. This field cannot be modified and is only displayed after a record sheet has been anonymized. This field is automatically filled in during the anonymization batch execution.

Marking multiple contact record sheets as "to be anonymized" at once

From the contact search results, multiple contact record sheets can be marked as "to be anonymized" at once. The DMF 160418 is required to do so. Select multiple contacts, then right-click on the selection and click **Mark as "to be anonymized"**.

To remove this marking, select multiple contacts, then right-click on the selection and click **Cancel "to be anonymized"**.

Searching for contacts

Search criteria are available in the **Other Criteria** section of the contact search:

Field	Description
Radio button: All/To be anonymized/Not to be anonymized	All: search results include both contacts that are marked as "to be anonymized" and contacts that have no marking. To be anonymized: search results only include contacts that are marked as "to be anonymized". Not to be anonymized: search results only include contacts that have no marking.
Anonymized between xxx and yyy	Enables to search for contact record sheets that were anonymized over a given period of time.

Specific DMFs

The following DMFs help protect the data included in a contact record sheet:

- The DMF 160419 controls the access to the **Personal contact details** tab. This DMF also controls the display of the corresponding fields in search results.
- The DMF 160420 controls the display of the **Direct phone**, **Mobile** and **Email** fields in the contact details. This DMF also controls the display of these fields in search results.

Specific fields

The **Created on** and **Modified on** fields, located in the **Tracking** tab of the contact record sheet, give more information about the contact data management.

These fields are also available as search criteria in the **Other Criteria** section of the contact search: **Created between xxx and yyy** and **"Last changed" date between xxx and yyy**.

6 Anonymization process to ensure the right to be forgotten

Under the GDPR regulation, personal data that is no longer relevant for companies must be deleted: this is called the right to be forgotten. To address this regulation, Akuiteo makes it possible to anonymize the personal data included in designated employee or contact record sheets. This anonymization process is carried out using a specific batch.

6.1 RECORD SHEETS TO BE ANONYMIZED

Employee and contact record sheets can be marked as "to be anonymized". For the designated record sheets, the **To be anonymized** indicator is displayed in the header. A specific search criterion is also available to search for all the record sheets to be anonymized.

When the anonymization batch is launched, only the employee and contact record sheets marked as "to be anonymized" will be included in the anonymization process.

Reference

For more information about anonymizing employee and contact record sheets, refer to [Marking an employee record sheet as "to be anonymized" \(p. 10\)](#) and [Marking a contact record sheet as "to be anonymized" \(p. 12\)](#).

6.2 ANONYMIZATION BATCH

Important

The anonymization process cannot be reversed. When the designated record sheets are anonymized, the personal data is permanently modified and the original data cannot be retrieved.

The **GDPR_Anonymization** batch anonymizes all the personal data included in the employee and contact record sheets marked as "to be anonymized".

During the execution, the personal data included in the record sheets is replaced by random anonymized data. The list of data considered personal is standard so it is the same for all Akuiteo users.

However, data that is not considered personal in standard can actually be used to contain personal information, for example custom data. The anonymization batch does not take into account non-standard personal data, which needs to be anonymized manually.

6.2.1 Prerequisites

The numbering of some business documents can contain personal information. The original numbering needs to be automatically replaced in order to anonymize these documents. Before executing the anonymization batch, the following automatic numbering must be set up for the ***** company:

- employee (CLB) numbering;
- users (UTI) numbering.

This setup is done from **General setup > Company > Automatic management objects numbering**. If the setup is not done correctly for the ***** company, it is impossible to execute the batch.

6.2.2 Batch execution

The batch must be set up and launched by a user with the appropriate rights. Once launched, the anonymization batch is carried out in three steps.

Step 1: Data search

A search is made among all companies to find all the employees and contacts that are marked as **To be anonymized** with an empty anonymization date.

Step 2: Data update

For an employee:

- Data to be anonymized:
 - the employee record sheet;
 - the linked supplier employee record sheet;
 - the linked user record sheets;
 - the linked contact record sheets.
- Data to be deleted:
 - the employee's photograph;
 - the related fields' detailed history;
 - the link between an employee and a document record sheet;
 - the link between an employee and an event.

For a contact:

- Data to be anonymized:
 - the contact record sheet;
 - the linked user record sheets.
- Data to be deleted:
 - the contact's photograph;
 - the related fields' detailed history;
 - the link between a contact and a target;
 - the link between a contact and a document record sheet;
 - the link between a contact and an event.

For the fields to be anonymized, all values are replaced according to the following rules, even if a field is empty:

Field type	Rules
Text	The field is emptied.

Table 2: Anonymization rules

Field type	Rules
	When a value is required, the field is filled in with an asterisk *.
Numerical	The field is emptied. When a value is required, the field is filled in with 1.
Date	The field is emptied. When a value is required or meaningful (for example an employee's departure date, which should not be emptied otherwise the employee would no longer be considered gone from the company), the field is filled in with 01/01/2000 .
Radio button	The default value is used.
Checkbox	The field is emptied.

Table 2: Anonymization rules

Step 3: Batch log and summary sent by email

When the anonymization batch is finished, the data that was anonymized is listed in the batch log.

A summary is sent by email to the recipient's address, entered during the batch setup. This summary (only) contains the email addresses of the employees and contacts that have been anonymized. Using this information, it is possible to send an email to each person and inform them their record sheets have been successfully anonymized.

7 Other impacted modules

Some Akuiteo modules can be used to contain personal data. Specific features can be used to help protect the personal and professional data identified during the inventory of your personal data usage. These features are available from the 4.1 version onwards in the following modules.

7.1 DOCUMENT RECORD SHEET

A document record sheet can be identified as a document including personal data.

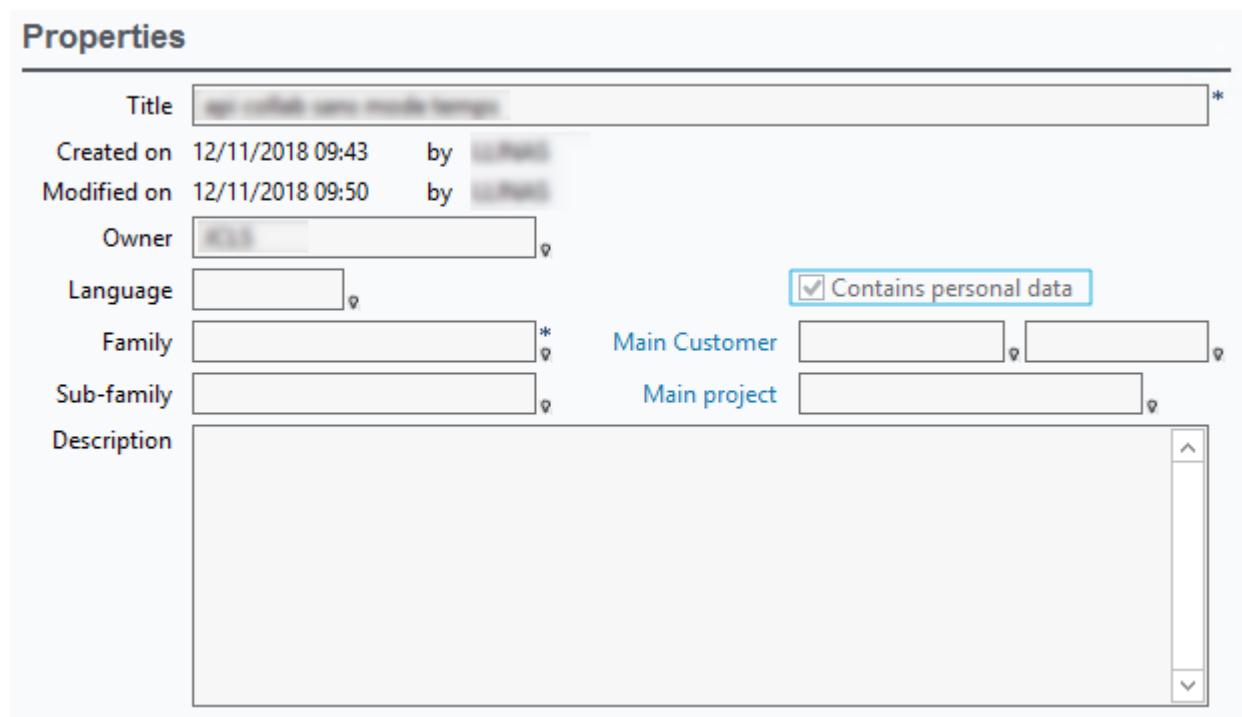
These document record sheets and the linked files can only be accessed by users with the DMF 100119. The same applies for documents listed in the linked documents tab of any business documents: if a document includes personal data, it is only available for users with the DMF 100119. If the business document's tab only contains documents with personal data, this tab is not displayed to users without the appropriate DMF.

Marking documents containing personal data

The DMF 100120 is required to mark a document record sheet as a document containing personal data.

From the desired document record sheet, go to **Edit > Contains personal data** and click **Yes** to confirm.

↳ In the document record sheet, the **Contains personal data** box is checked in the **Properties** section.



The screenshot shows the 'Properties' section of a document record sheet. The 'Title' field is at the top, followed by 'Created on' and 'Modified on' dates and times. Below these are 'Owner', 'Language', 'Family', and 'Sub-family' fields. The 'Description' field is a large text area at the bottom. On the right side, there is a checkbox labeled 'Contains personal data' which is checked. Below this checkbox are two more fields: 'Main Customer' and 'Main project'.

Image 3: Document record sheet marked as containing personal data

To remove this marking for a document that no longer contains personal data, go to **Edit > Does not contain personal data**.

Marking multiple documents containing personal data at once

From the document search results, multiple document record sheets can be marked as containing personal data at once. The DMF 100121 is required to do so. Select multiple documents, then right-click on the selection and click **Contains personal data**.

To remove this marking, select multiple documents, then right-click on the selection and click **Does not contain personal data**.

Searching for documents

The **Contains personal data (All/Yes/No)** search criterion is available in the main tab of the document search. This search criterion can only be used by users with the DMF 100119. For users without this DMF, the search criterion is always set to **No**.

Controlling document authorizations

The DMF of your choosing can be assigned to a document record sheet from the **Authorization** tab. If a DMF is assigned, the document record sheet can only be accessed by users with the appropriate DMF.

7.2 SUPPLIER RECORD SHEET

The following DMFs limit the access to personal data in supplier employee record sheets:

- The DMF 040132 controls the access to supplier employee record sheets. Users without this DMF cannot access supplier employee record sheets (even from purchase invoices) and cannot search for supplier employees.
- The DMF 040650 controls the access to supplier employees' invoices and credit notes. Users without this DMF cannot access the invoices or credit notes of a supplier employee and cannot search for supplier employees' invoices from an invoice search.

7.3 EVENT RECORD SHEET

The DMF of your choosing can be assigned to an event category. If a DMF is assigned, the events from this category can only be accessed by users with the appropriate DMF.

To assign a DMF to an event category:

- 1 Go to **Tools > Setup**.
- 2 Open **General setup > Cross-cutting > Event categories**.
- 3 Open the desired event category. The **DMF** field is located in the **Authorization** tab.

7.4 MARKETING TARGET

The DMF 160420 controls the display of the **Direct phone**, **Mobile** and **Business email** columns in the **General** and **Contacts** tab. Users without this DMF cannot see these columns.

The DMF 160420 also controls the display of the **Mobile**, **Direct phone** and **Email** fields in the Web Portal, in the **Contacts** tab of the customer record sheet.

7.5 CRM QUERY

Personal data can be accessed from the CRM query search results. The column display cannot be controlled because the values are entirely customizable. However, it is the access to the module that can be controlled. The CRM query module can only be accessed by users with the DMF 160419 and 160420.