FIS

CENTRL

Quick Start Guide

Privacy360

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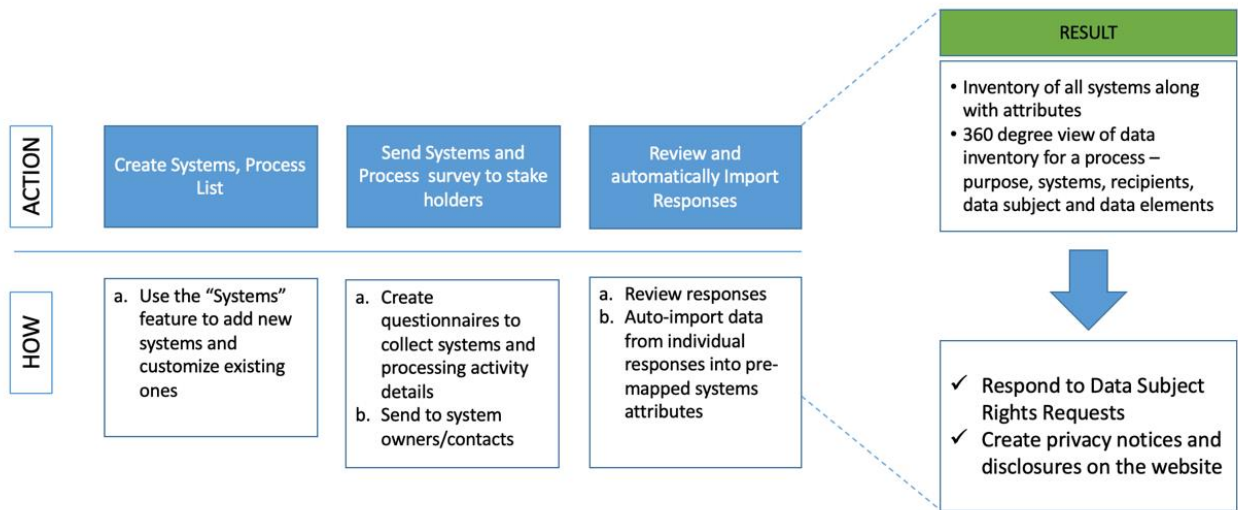
1. Privacy360 High Level Flow

1

Build Systems and Data Inventory

- Create an inventory of systems and processing activities
- Capture details like:
  - Purpose of processing
  - Type of data collected and for whom
  - Location where data is stored
  - Third parties with whom data is shared or sold to

2

Manage Data Subject Requests

- Provide form for data subjects to submit rights requests:
- Fulfill request per regulation guidelines (for example: CCPA requests must be fulfilled within 30 days)

3

Conduct Data Protection Assessments (Ongoing)

- Create list of controls to assess
- Conduct assessments on internal processes as well as external partners to ensure data protection
- Conduct assessments on a regular cadence

2. Build Systems and Data Inventory

2.1.   High Level Flow

2.2.   Managing Systems

The *Systems* section lets users create new systems and customize existing ones. Also, you can use this section to bulk manage data elements associated with each system.
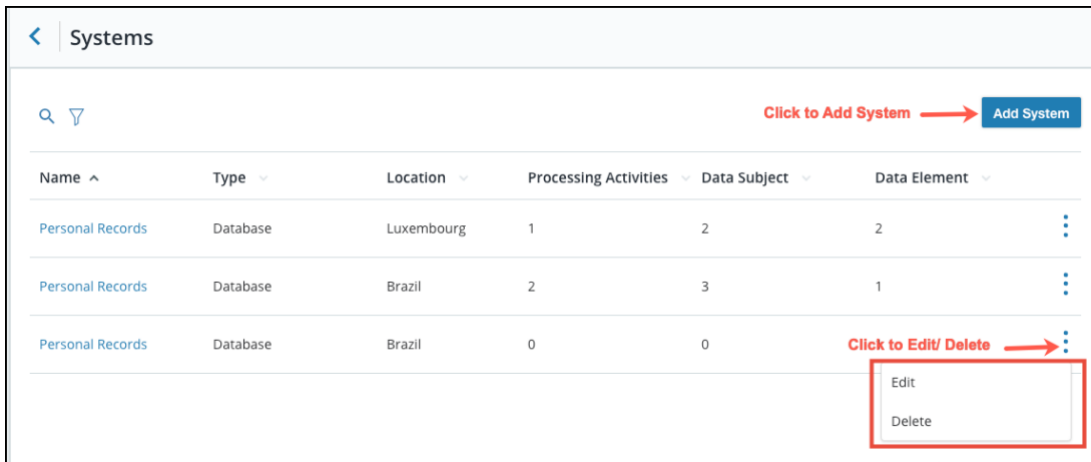
To add a new system, please follow the steps below:
- Navigate to the **Systems** screen within the *Data Inventory* module.
- Click on the **Systems** tab and further click on the **Add System** button (as shown below)

- To add a new system, click on the **Add System** button.
- To manage a System, click on the **3 dots** and select **Edit** or **Delete.**


2.3. Creating Internal Functions

Within CENTRL's Data Inventory Module, Internal Functions serve as the terms corresponding to Internal Departments, Divisions, and other internal organizations within a company.

Each Internal Function can have multiple processing activities. For example, Human Resources could be an Internal Function containing multiple processing activities such as Payroll, Hiring, and Benefits.

To create an Internal Function, follow the steps below:
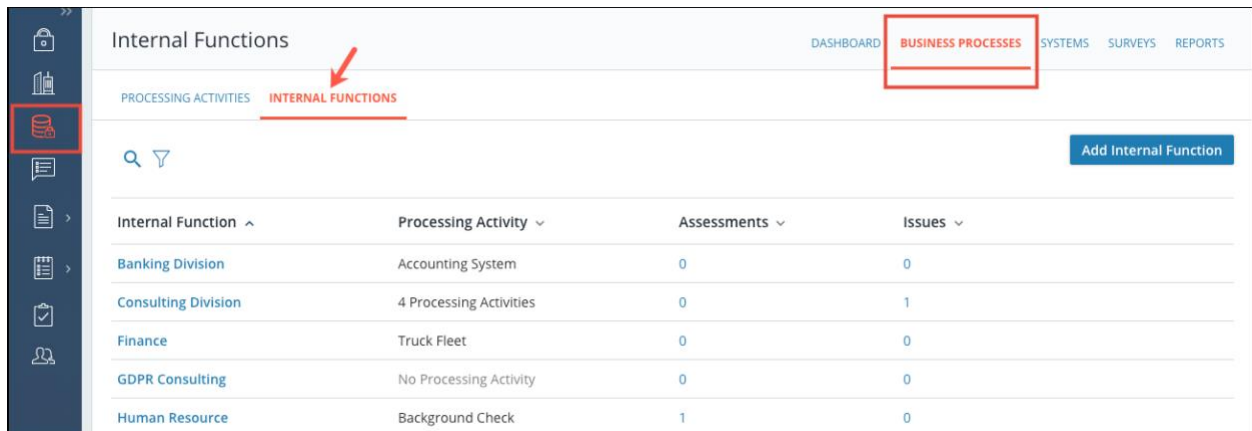
- Navigate to **Data Inventory** from the sidebar and click on the **Business Processes** screen at the top right.
- Click on the **Internal Functions** tab.

- Click on the **Add Internal Function** button as shown above.

- Give your Internal Function a name and add a description using the Description box. Click on the **Save Internal Function** button as shown above.

- To learn more about creating Internal Functions, click here

2.4.   Creating Processing Activities

To create a Processing Activity, follow the steps below:

- Navigate to the **Business Processes** screen from the *Data Inventory* module.
- Click on the **Processing Activities** tab.

- Click on the **Add Processing Activity** button to add a new processing activity.

- Enter all the mandatory fields (marked as *) on the *New Processing Activity* page and click on the **Save** button.

A success message will appear at the bottom of the screen and the processing activity will be added as a new row in the *Processing Activities* screen.

2.4.1 Managing Processing Activities

You can edit your processing activity and information about the associated Data Subjects, and the Data Categories associated with each Data Subject. To learn more, click on the links mentioned below.

- Editing a Processing Activity
- Editing the DPIA Status

## 2.5 Populating a Processing Activity

a. Adding Consumers
CENTRL's Data Inventory module allows you to create a Data Inventory of Consumers associated to each Processing Activity. A consumer (also known as a Data Subject) is any person whose personal data is being collected, held or processed. Follow the steps below to add Consumers to your Processing Activity.

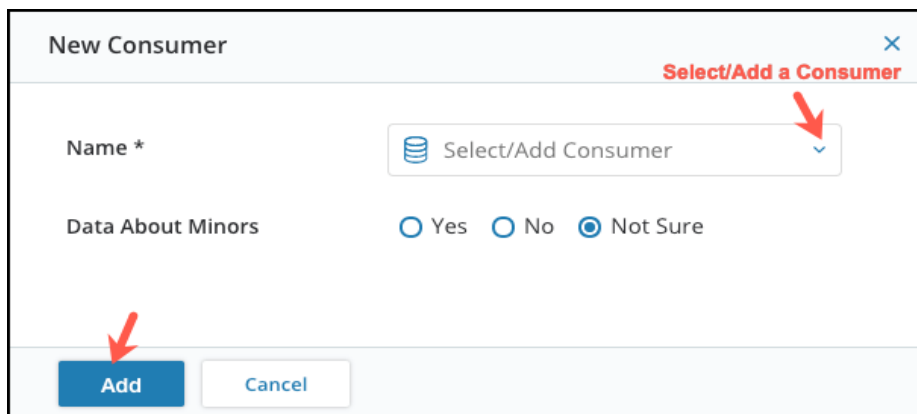- Navigate to the **Processing Activities** view from the **Business Processes** *screen* and click on the appropriate Processing Activity.
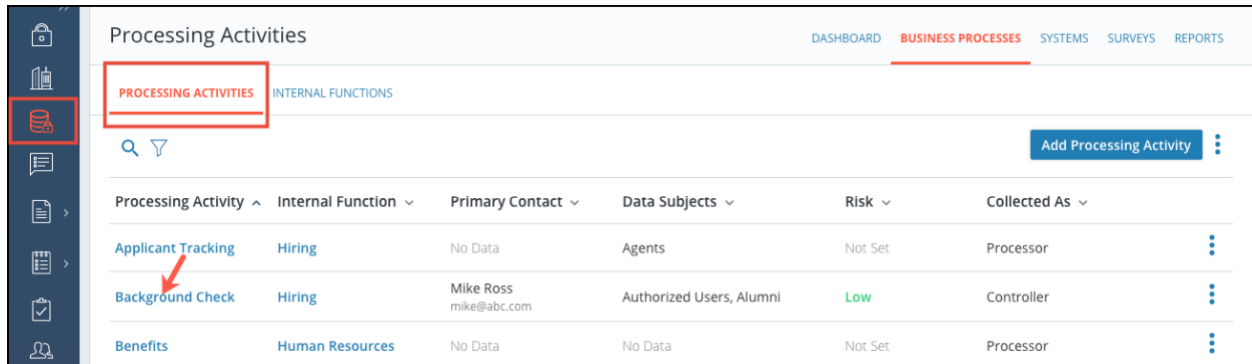
- Within the Details screen, click on **Consumers** and then click **Add Consumers**
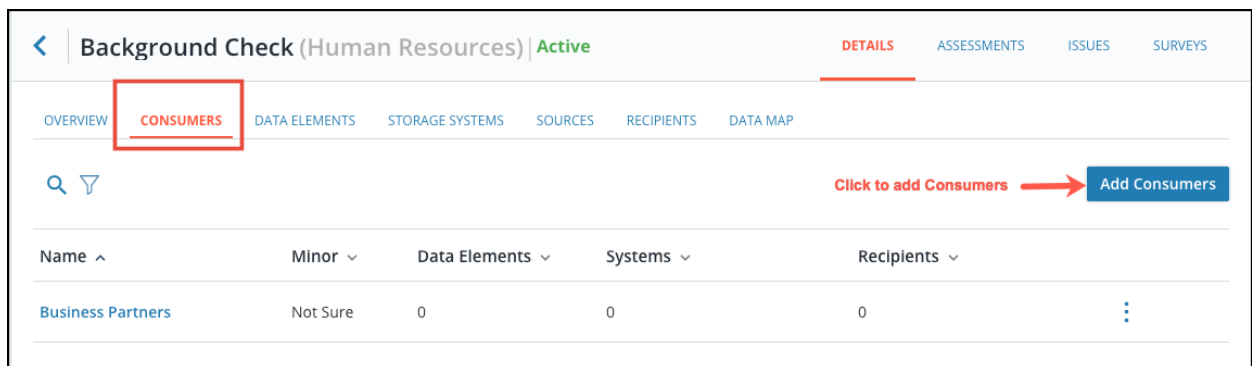
- Within the **New Consumer** modal, select or add a new consumer by clicking on the drop-down. Click on the **Add** button to complete creation


- To learn more about Consumers, click here

b. **Managing Data Elements**

Data Elements track the specific information collected and processed under this activity. When users add data elements and their associated system, they become available in our data library to quickly add to other activities. This feature allows capturing of data elements and the details associated with it. This segment allows us to create data elements and select/ create new attributes associated with that data element. Follow the steps below to manage data elements

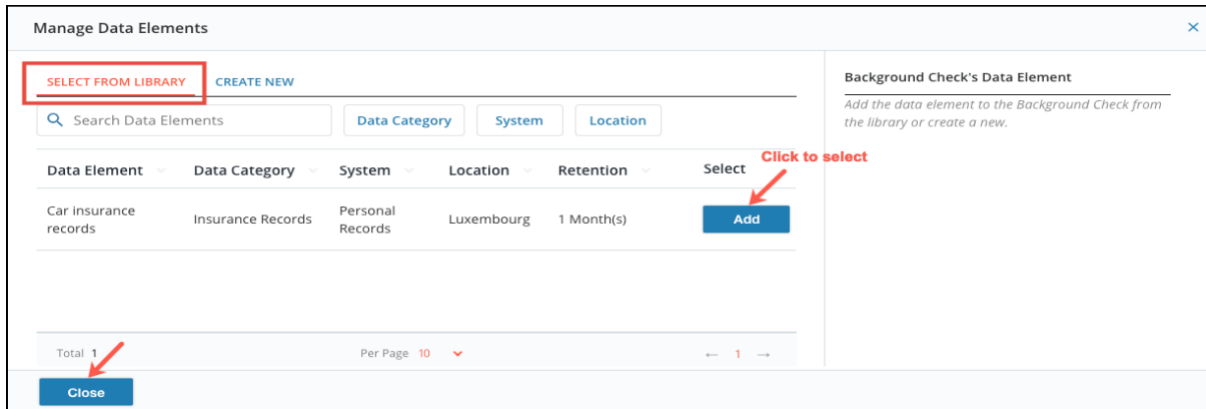**Note**: To add data elements, you must first add a single consumer.

- Navigate to the **Processing Activities** view from the *Data Inventory* module and click on the name of the Processing Activity of your choosing.
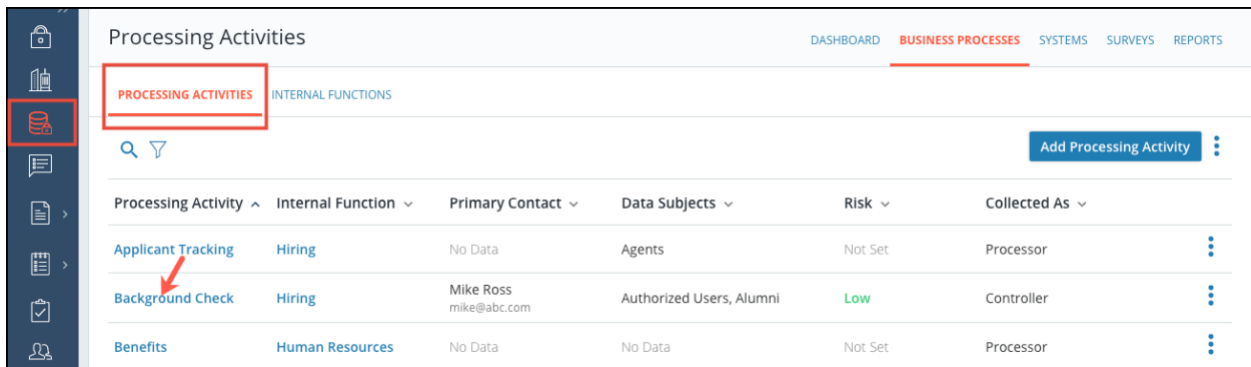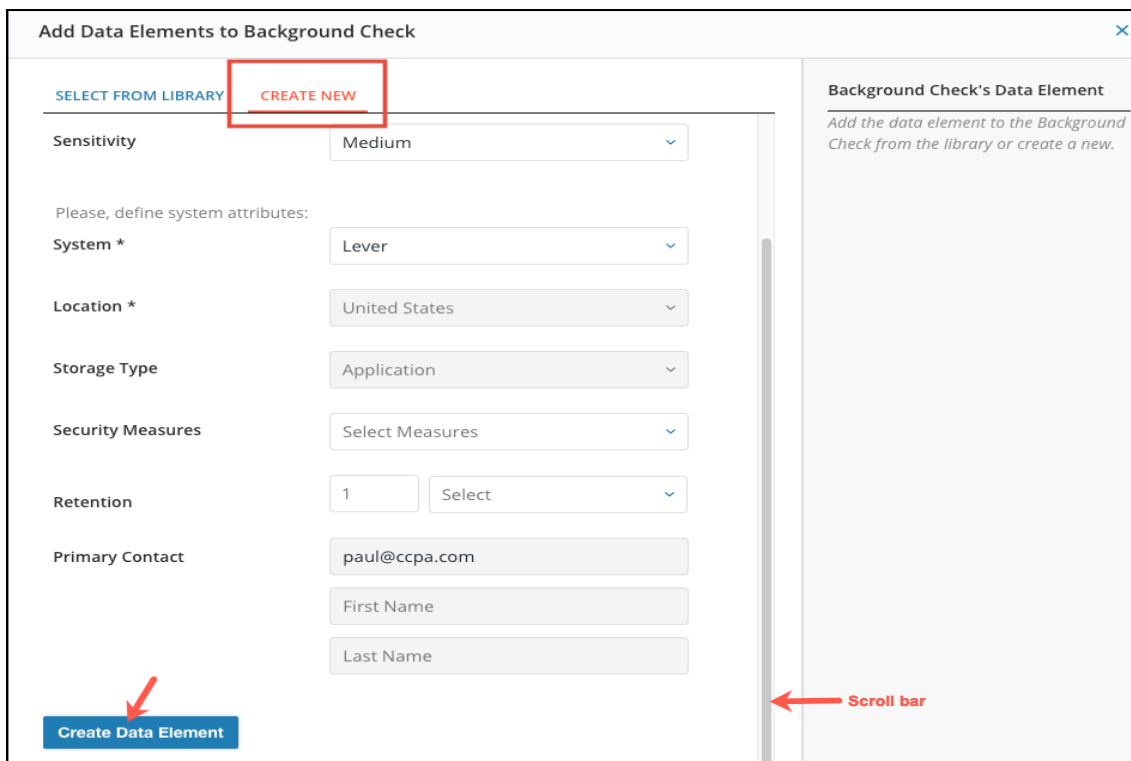

- From within the Processing Activity **Details** screen, click on the Data Elements tab and click on the **Manage Data Element** button.
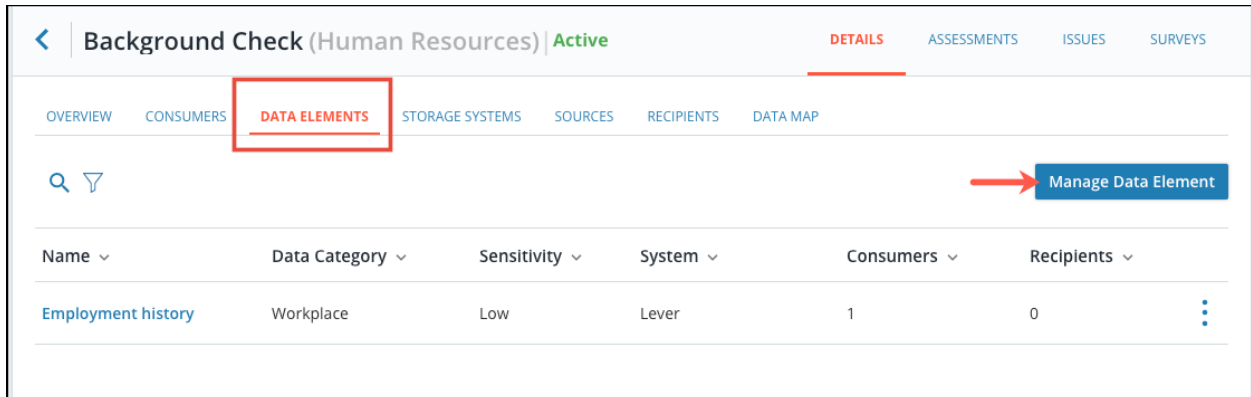
- If the Data Element already exists in your library, then click **Add** and then **Close**

- If the Data Element is new, then click **Create New**. Then enter all details pertaining to the data element, and click **Create Data Element.**


- To learn more about Data Elements, [click here](#)

c. **Adding a Recipient**
   Recipients include any entity receiving data with as part of this processing activity, internal or external. Customers with our DSAR module can leverage the recipient contact to notify recipients of deletion requests. Follow the steps below to add a recipient

- Navigate to the **Business Processes** screen from the *Data Inventory* module
- Click on the **Processing Activities** tab and click on the name of the processing activity of your choosing.
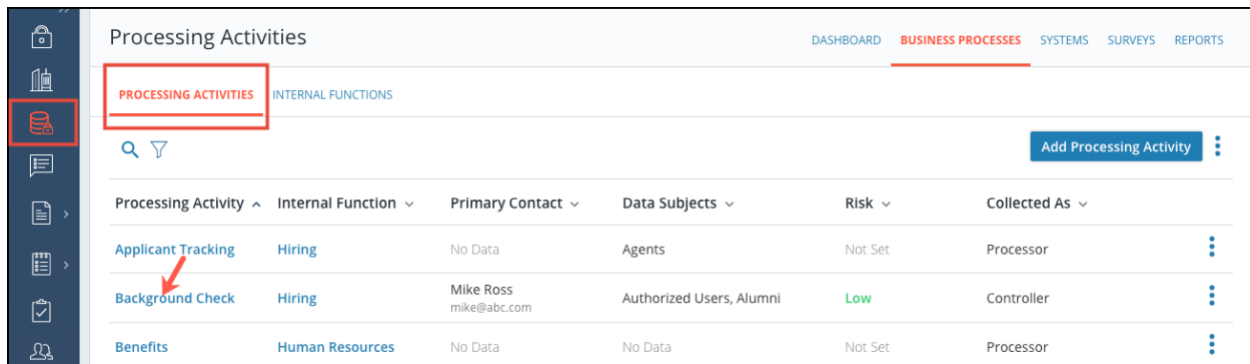
- Navigate to the **Details** page from the *Data Inventory* module and click on the **Recipients** link.
- Click on the **Add Recipient** button dropdown and select from the **System** or **Organization** option.
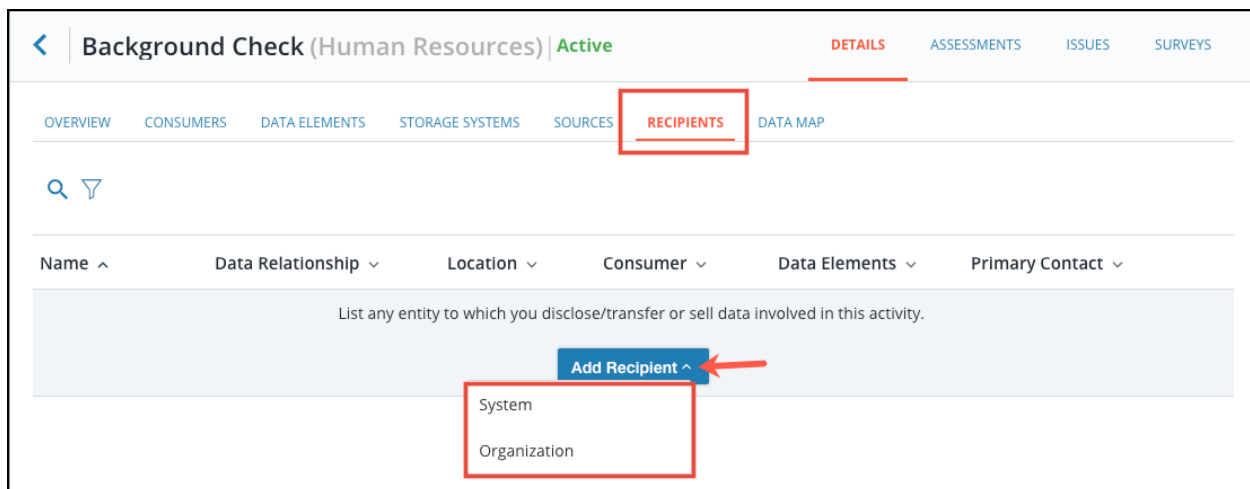
- Within the modal, enter all the details as per your requirement and click on the **Add** button as shown above.

Note: For the *Recipient Organization* option, you also have the option to drag and drop files if required.

- A success message will appear at the bottom of the screen and the Recipient will be created within the Recipients screen.

    Managing Recipients
    You have the option to manage the recipients. Click on the following link to learn more about this feature:

    - [Editing a Recipient](#)
    - [Deleting a Recipient](#)

2.5.   Publishing a Request from Overview Screen

Data Inventory Requests allow you to collect information about a processing activity from the appropriate business unit member. A Data Processing Officer (DPO) can send Data Inventory Requests to each business owner associated with the processing activity. When the answers from the business owners are submitted back, the DPO can easily populate the data inventory based on the answers provided. Follow the steps below to publish a Data Inventory Request.

- Select a processing activity from the list by clicking on it.

- Within the *Details* screen click on the **Overview** tab and further click on the **Send Request** button as shown below.

- Search and select a questionnaire. (**Note**: You can pick any questionnaire that is either Approved or has been Published in the past)
- Select or add a new internal business unit contact you want to send the survey to. Click on the **Next** button to proceed. (**Note**: If the processing activity already has a contact assigned to it, that contact will be pre-selected)
- Confirm the request details and then click on the Publish button to send your request.

2.6 Creating a Data Inventory Survey

Data Inventory Surveys allow you to collect information about a processing activity from the appropriate business unit member. A Data Processing Officer (DPO) can create and send a Data Inventory Survey to each business owner associated with the processing activity. When the answers from the business owner are submitted back, the DPO can easily populate the data inventory based on the answers provided.

Note: We currently support *Processing Activity* and *System* survey questionnaires.

To learn more about creating a data inventory survey, click on the link below

- Creating a Data Inventory Survey

Additional Links:

- Editing a Data Inventory Survey
- Publishing a Data Inventory Survey
- Publishing Data Inventory Request to Multiple Recipients
- Publishing a Data Inventory Survey from the Overview Screen

2.7 Responding to A Data Inventory Survey

Business owners can add answers and submit back the received Data Inventory Requests to the Data Processing Officer (DPO) for review. When the answers from the business owners are submitted back, the DPO can easily populate the data inventory based on the answers provided.

Please click <u>here</u> to see how business owners can add answers and submit back the received Data Inventory Requests to the Data Processing Officer (DPO) for review.
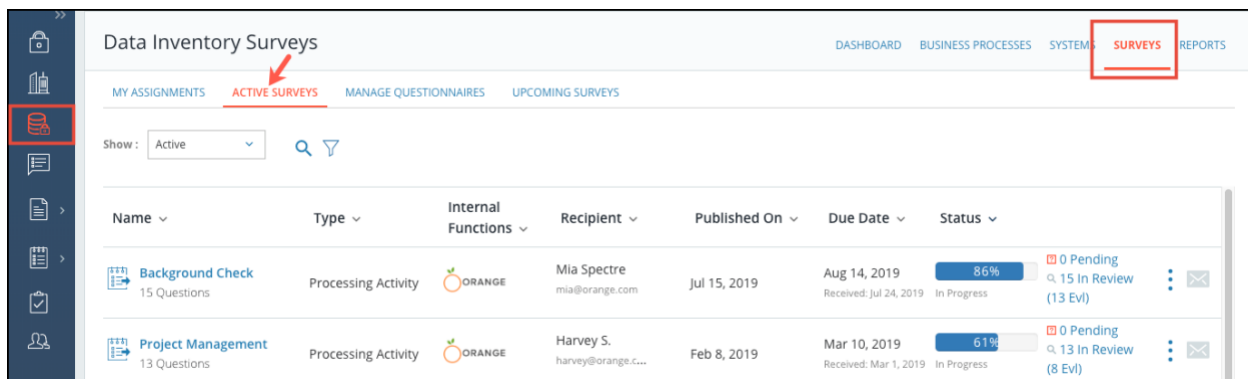
2.8 Reviewing and Evaluating Responses for your Data Inventory Survey

1.Evaluate Responses

Once the business owner has completed the *Data Inventory Request* and submitted it back, the Data Processing Officer (DPO) will want to review the answers and map them to back to the Processing Activity.

Follow the steps below to evaluate a *Data Inventory Request*

- Navigate to the Active Requests screen of the Request tab within the Data Inventory module.

- Click on the appropriate survey under the *Name* column.

2.Map Answers

During the evaluation process, you have the option to use the **Map Answers** feature to automatically populate the partner profile with the answers received from your partner.

Note: This is an optional step.

- Click on the 3 dots at the top right of the screen and click **Map Answers**

- Once ready, click on the **Map Answers** button to proceed.
- The associated Processing Activity will be populated with the responses provided in the Data Inventory Survey.

To learn more about this feature, click on the following link:
Mapping Answers during Evaluation

3.Complete Surveys

The final step in the Evaluation process is to Mark a Survey as **Complete** and update the Risk associated with the Partner and the associated Product(s). Only the Questionnaire Owners and the Questionnaire Admins can mark a survey as "Complete."

- Click on the **Mark as Complete** button to finalize the evaluation process.

- Within the modal, you can view the Calculated Score along with the qualitative grade.
- You also have the option to update the Risk level for the processing activity you are evaluating.
- Once done, click on the **Complete** button as shown below.

Final Evaluation   ✕

Processing Activity:	Background Check
Internal Funtion:	Human Resource
Calculated Score:	**Unsatisfactory** (0/5)

Processing Activity Risk

> High ⌄

Evaluation Remark

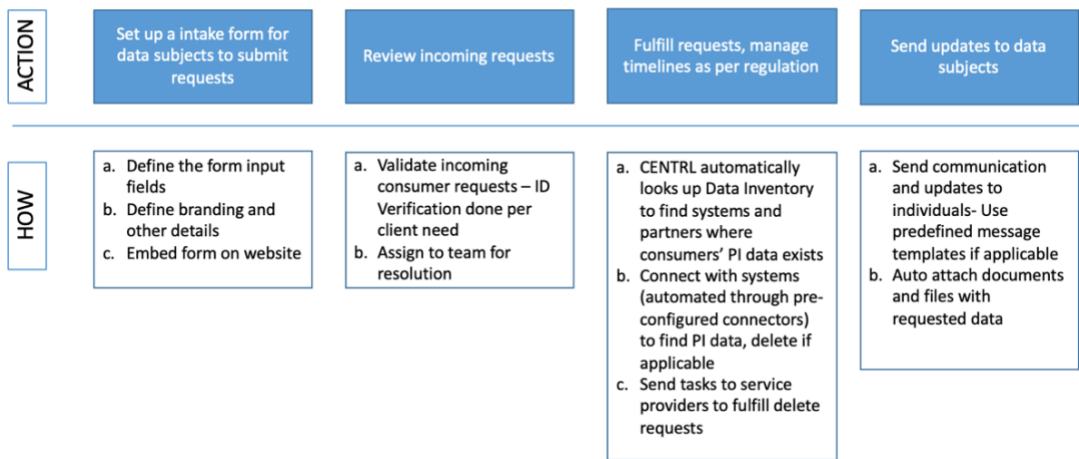> The score is unsatisfactory. marking this as a High-risk processing activity.|
>
> Remaining Text: 178

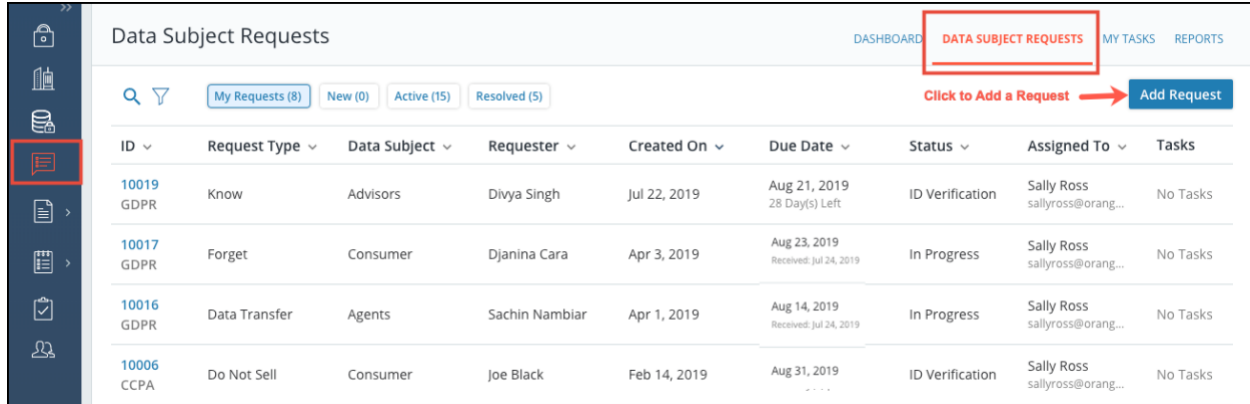**Complete**   **Cancel**

2. Manage Data Subject Requests

a. High Level Flow

ACTION	Set up a intake form for data subjects to submit requests	Review incoming requests	Fulfill requests, manage timelines as per regulation	Send updates to data subjects
HOW	a. Define the form input fields b. Define branding and other details c. Embed form on website	a. Validate incoming consumer requests – ID Verification done per client need b. Assign to team for resolution	a. CENTRL automatically looks up Data Inventory to find systems and partners where consumers' PI data exists b. Connect with systems (automated through pre-configured connectors) to find PI data, delete if applicable c. Send tasks to service providers to fulfill delete requests	a. Send communication and updates to individuals- Use predefined message templates if applicable b. Auto attach documents and files with requested data

b. Creating a Rights Requests

Using CENTRL's platform, Privacy360 users can directly add new requests by selecting the *Add Request* button on the request backlog. Here users can enter details and directly assign ownership. This process skips email verification.

Users should leverage this workflow to add requests received outside of the web form including support cases, calls, and emails. Follow the steps below to create the rights request:
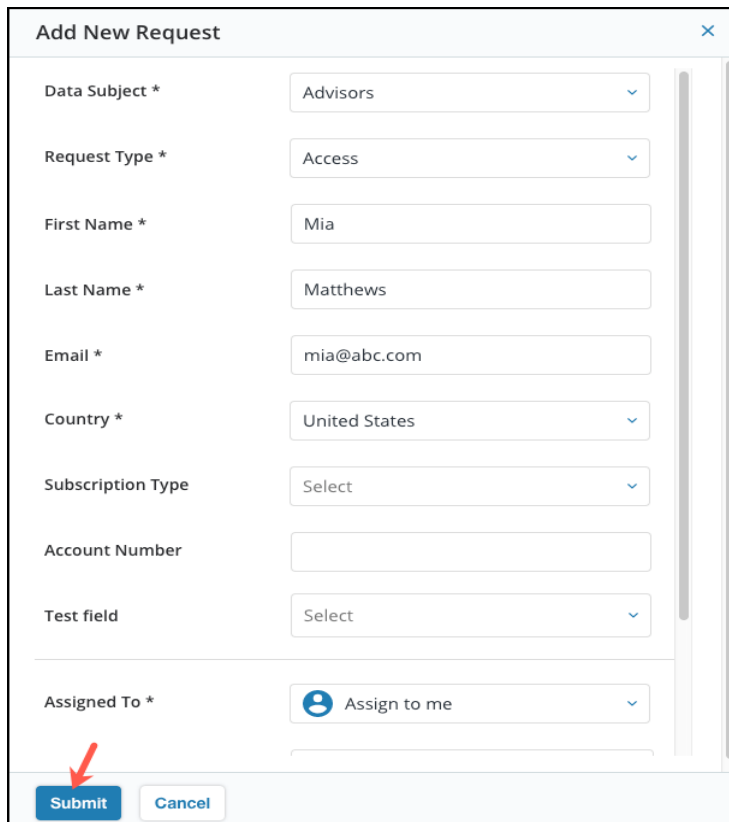
- Navigate to the **Data Subject Requests** screen from the *DSAR* module and click on the **Add Request** button as shown below.

- Within the *Add New Request* modal, enter the request details, and the mandatory fields along with any additional information to send to the recipient and click on the **Submit** button.

- A success message will appear at the bottom of the screen and a new row will be added within the *Data Subject Requests* screen.

c. Creating a Rights Request using Web Form

Privacy360 lets individuals submit rights requests through a customizable web form or directly from the request backlog. Directly creation lets our customers track and manage rights requests received through other channels like email or phone.

To learn how to create a request web form, please click here.

d. Managing Incoming Requests

CENTRL's Individual Rights Request module makes it easy to carry out requests in compliance with GDPR and CCPA regulations. This article will help you understand the basics of a rights request including your legal obligations.
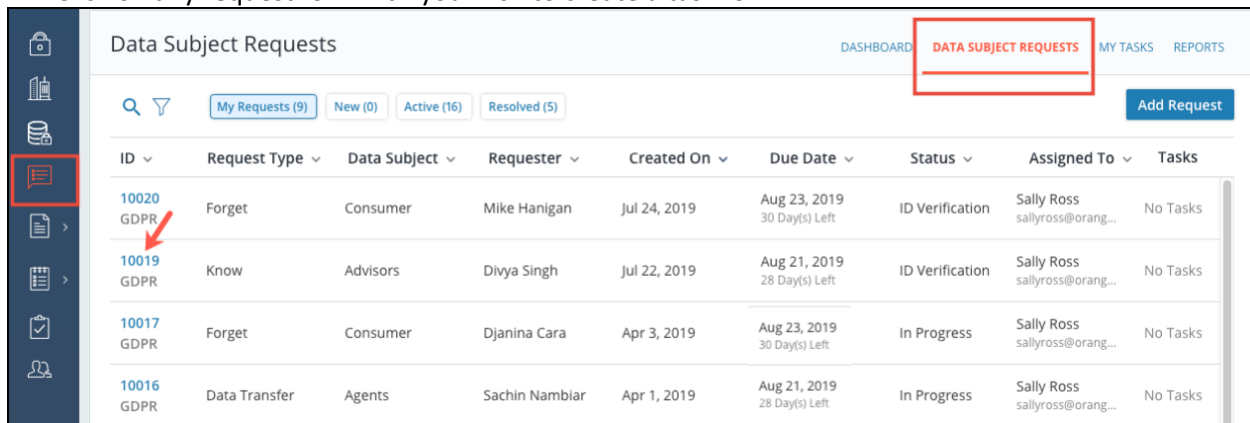
Click on the below-mentioned links to learn more about each feature:

- Navigating to your Request
- Editing a Request
- Verifying the Data Subject
- Communication and Collaboration
- Assigning a Request
- Extending the Due Date
- Resolving a Request
- Viewing your Request History

e. Creating a Task

Often, privacy users will need to reach out to system owners in other teams or external partners to complete individual rights requests. Tasks help us assign specific actions to these system owners and require either an attached document or confirmation as part of the resolution.

- Navigate to the **Data Subject Requests** screen from the **DSAR** module.
- Click on any request for which you wish to create a task for.

- Navigate to the Tasks sub-tab and click the **+ Task** icon.

Alternatively, you can also click on the **+ Task** icon at the top right.

- Enter the mandatory as well as other fields and click on the **Create** button.

To learn more about creating and managing Tasks, [click here](#)

a. Responding to a Rights Request

As a Data Controller, you can send a Public message to your Data Subject /recipient of the Request to communicate with them in a convenient way. You can do this by either sending a public message or by selecting a template to submit the public message.

- Click on the **Public** tab of the Ticket Details screen and enter a message to send to your data subject
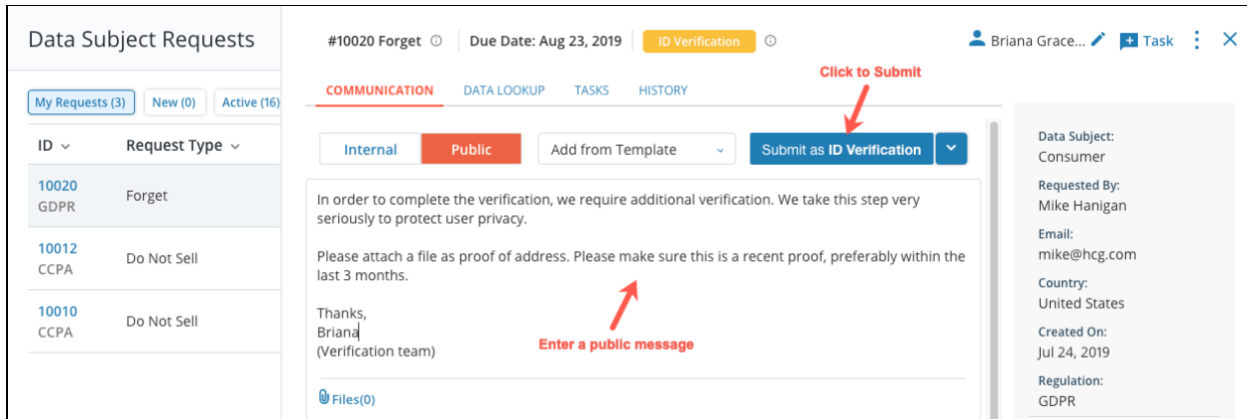
- Alternatively, you can also click on the **Add from Template** option to choose a template
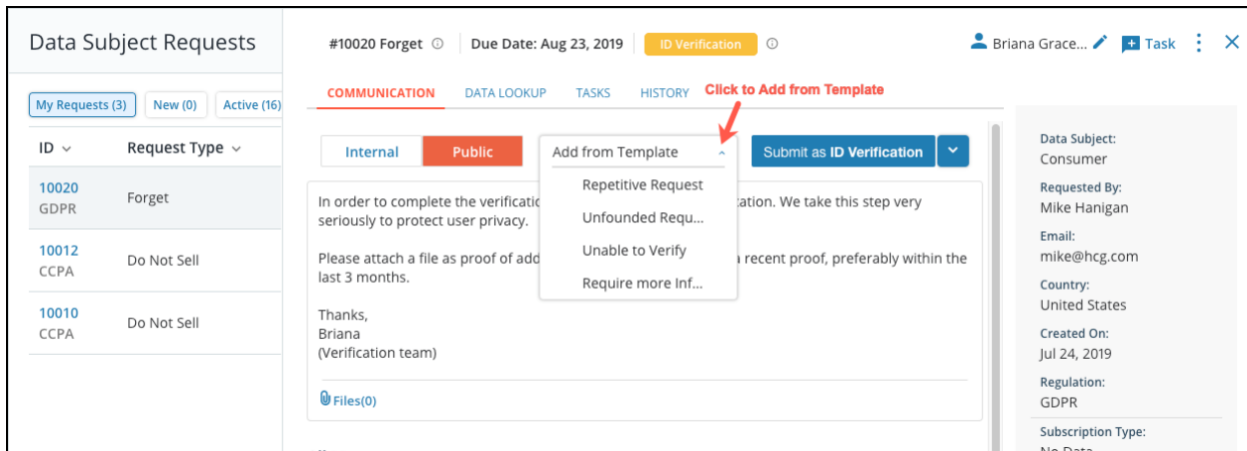
- Enter your explanation text and click on the **Submit as ID Verification** button. If you wish to select any other stage for your Ticket, click on the **Submit as ID Verification** dropdown and select a stage for the Request.
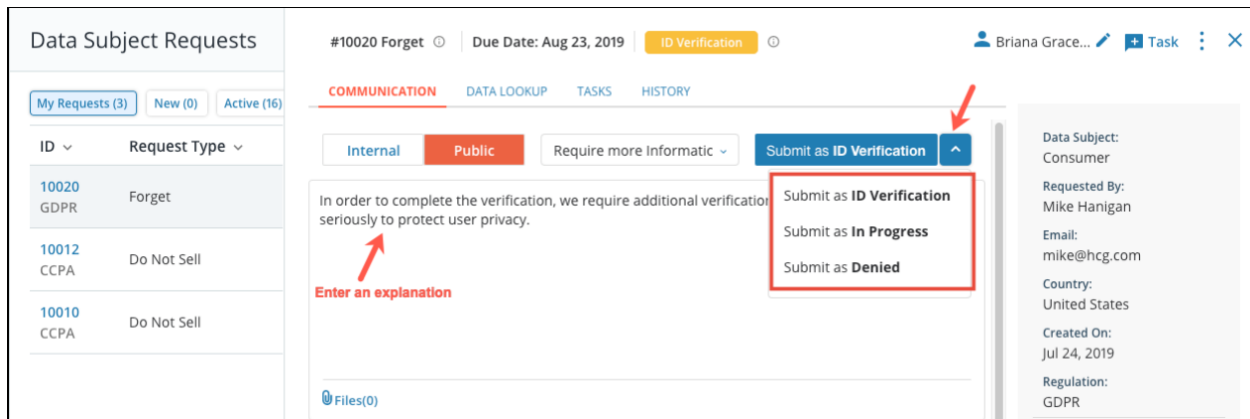
b. Resolving a Rights Request

When working on a Request, the DSAR owner can either grant or deny a Request to their data subject. Under GDPR, all denials must include a rational as well as for instructions on how to petition the denial to Data Authority and the right to seek a judicial remedy.

When you fulfill a request made by your Data subject, the status of the Request will be changed from *In Progress* to *Resolved (Granted) or Resolved (Denied)*.

- Enter an explanation text for your data subject and click on the **dropdown** next to the **Submit** button.
- Select **Submit as Granted** or **Submit as Denied.**
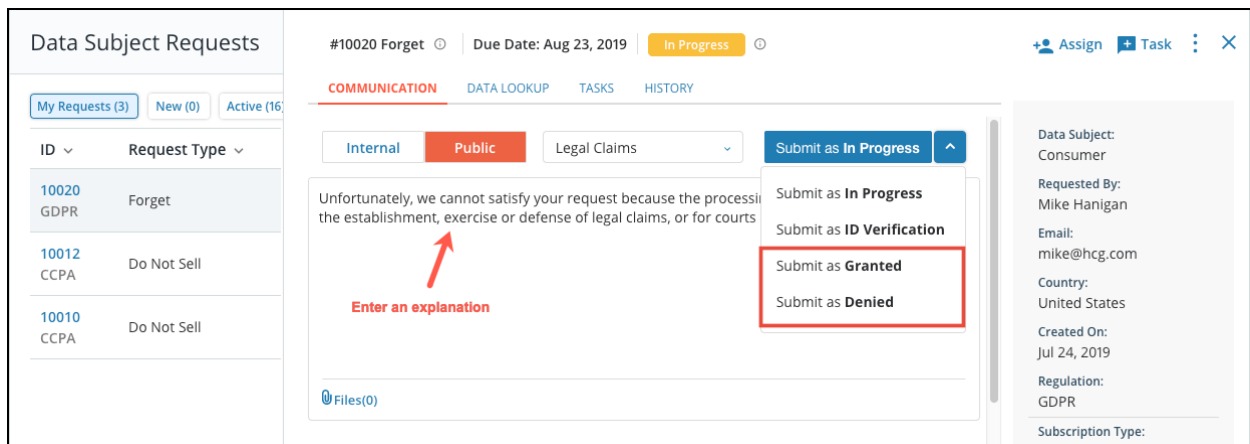
Please click here to learn how to resolve a rights request.

To learn more about Managing Rights Request and the DSAR module, please click here.

3. Conducting Data Protection Assessments

a. High Level Flow
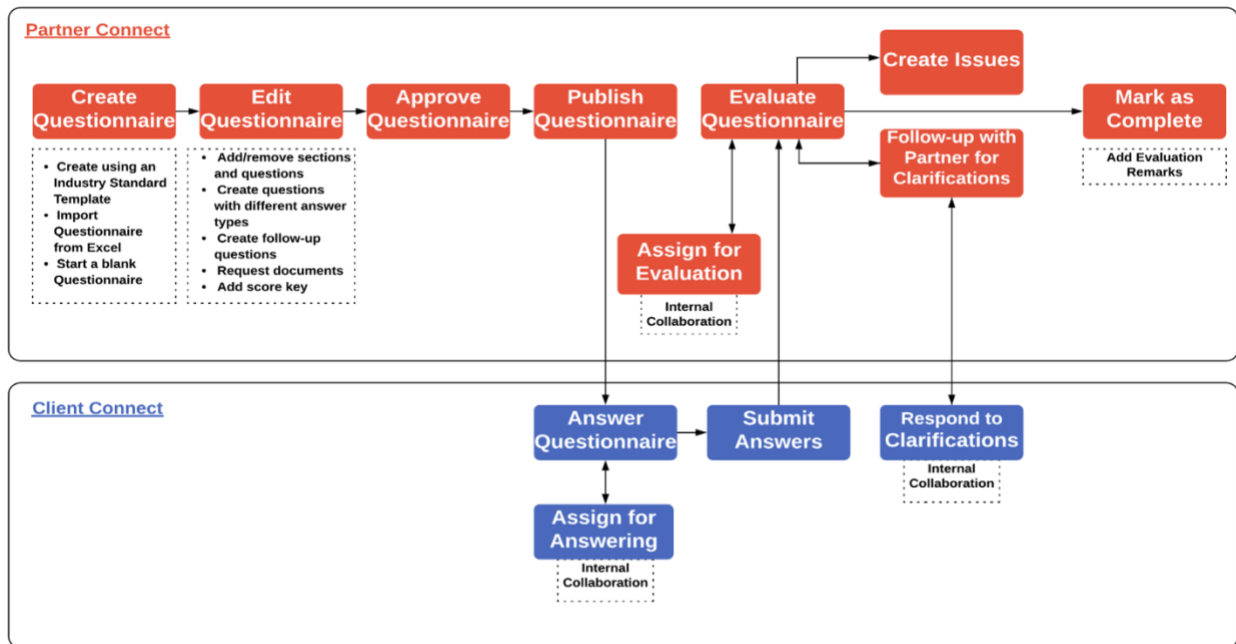
b. Creating Questionnaires

Using CENTRL's Assessments module, you can create and publish questionnaires to your vendors or partners. Your vendors/partners will be able to answer the questionnaires on a secure platform

- Navigate to the **Manage Questionnaires** screen in the Assessments module, and click on the **Create New** button.
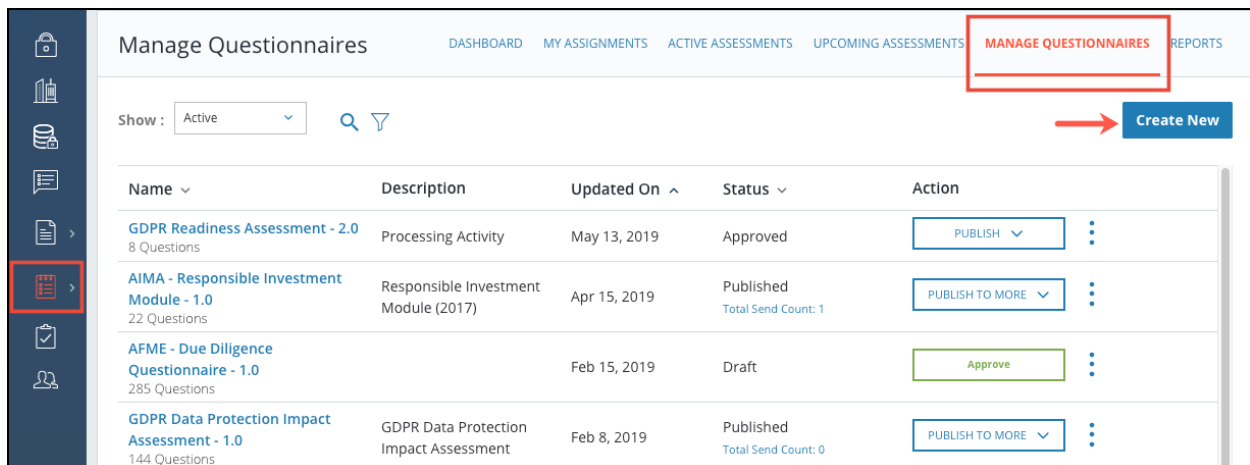
- To learn more about Creating Questionnaires, click here

c. Editing and Approving Questionnaires
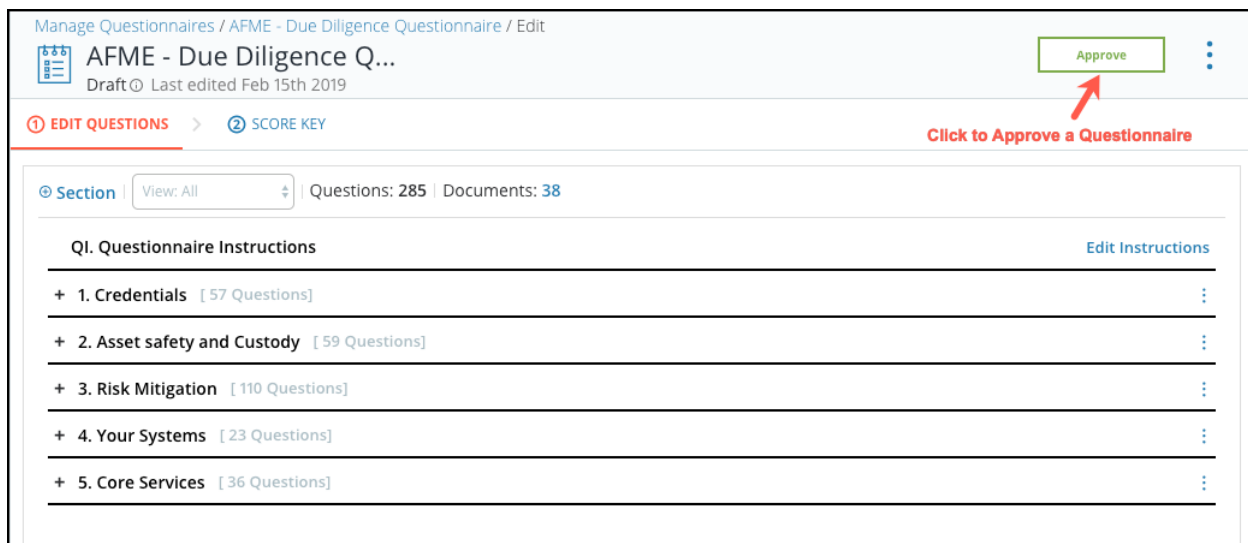
Once a questionnaire is created, you have the flexibility to customize your questionnaire to suit your needs. You can add or edit questions, sections, sub-sections, and follow up questions. You also have the ability to change the existing format and properties of your questionnaire.

Note: Questionnaires can be edited only if they are in *Draft* status and have not been Approved yet.

- Navigate to the **Manage Questionnaires** screen in the Assessments module, and click on a questionnaire in Draft status
- To learn more about Editing Questionnaires, click on the following link:

Editing a Questionnaire

- Once you're done editing the questionnaire, click **Approve**. In CENTRL's workflow, you can only publish questionnaires that have been approved.

d. Publishing Questionnaires

When you publish a questionnaire, your partners will be able to respond to your questionnaire using CENTRL's secure online platform.   Follow the steps below to publish a questionnaire as an assessment

- Navigate to the Manage Questionnaires screen in the Assessment module, and click **Publish**, and then **Publish to One**
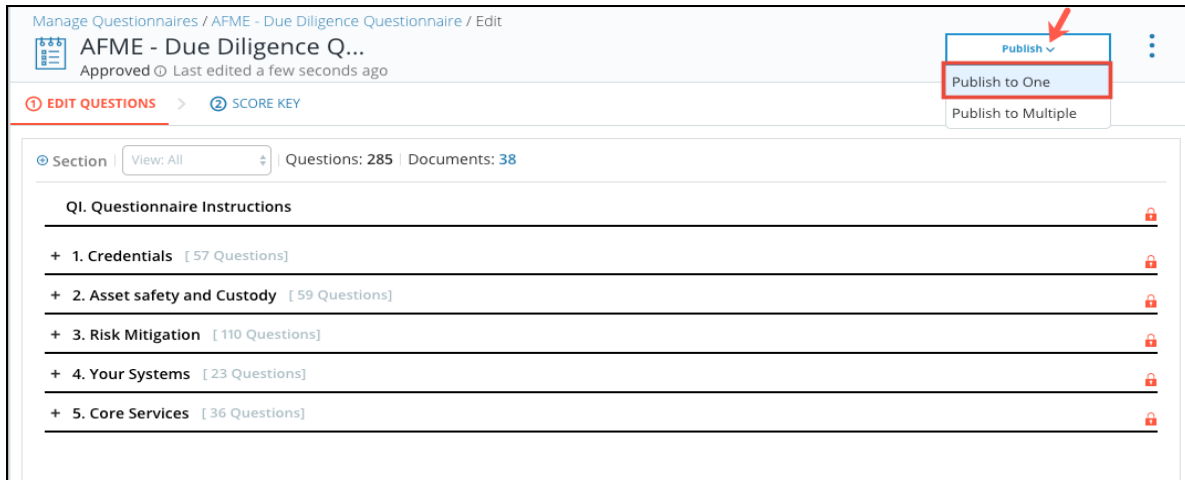
- Select which internal function or partner you are assessing, the Purpose (either Data Protection Impact Assessment or Readiness Assessment), and the Processing Activity. Click on the **Next** button to proceed.
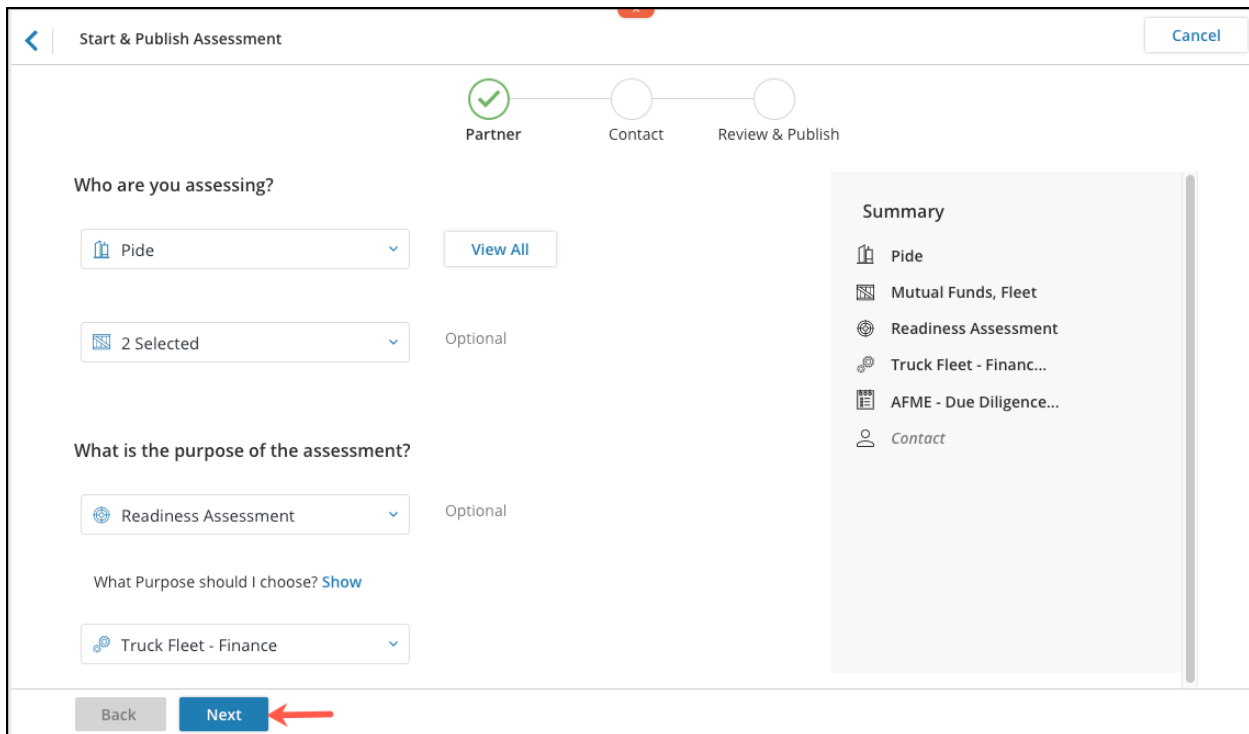
- Select the Contact. Contact is the user who will answer the assessment, either a Partner Contact or yourself.

- Select the publish and due date, period, and recurrence. Then click on the **Publish** button.

- Once the questionnaire is published as an assessment, you can see it both in the Active Assessments screen of the Assessments module OR the Assessments subtab of the associated Processing Activity (shown below)

e. Responding to Assessments

Using CENTRL's Assessments module you can quickly answer your partner's questions, assign parts of a questionnaire to your team, and submit your answers back to your partner.

To learn more about responding to Assessments, please click here

f. Evaluating Assessments

The Questionnaire Owner can begin the Evaluation process once the answers from your responders are received. While evaluating a questionnaire, you can assign grades/scores to answers, add observed answers, create clarifications or issues or assign questions to your colleagues for evaluation.

To learn about evaluating Assessments, please click here

To learn in detail about managing questionnaires and assessments, please click here.
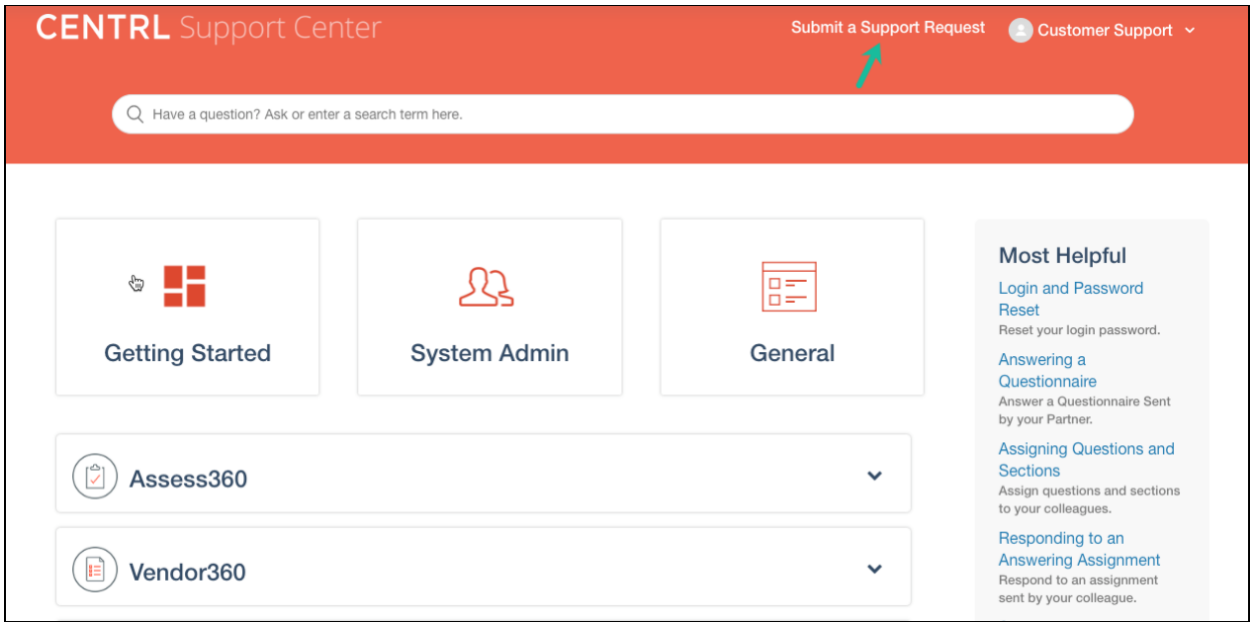
4. Support

To learn more about the different features offered within the platform or to submit a support request, please navigate to the CENTRL Support Center page by following the steps below:

- Click on your initials on the top right and select *Support*.
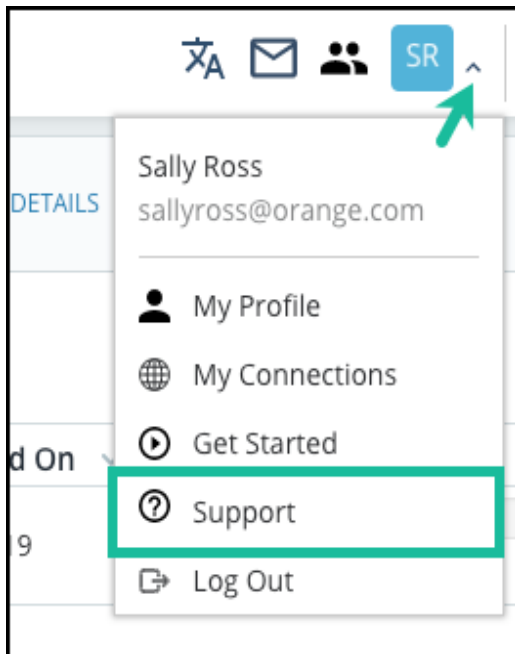
- You'll be directed to the CENTRL Support Center page. The support center provides access to articles on the full breadth of the system and allows you to submit a support request by clicking on **Submit a request** on the top-right.

- Fill in all the required information on this page and click on **Submit**.

- To chat with one of our support representatives from within the platform during normal business hours, click on **Support Chat** at bottom-left.

5. Document Version

Last edited	Author	Version
07/26/19	Various	V3
04/2/19	Various	V2