



What You Need to Know About Addressing GDPR Data Subject Rights in campusM

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Not Legal Advice

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Disclaimer

This paper is based on Ex Libris' understanding of certain requirements of the GDPR. However, the application of the requirements of the GDPR is highly fact specific, and many aspects and interpretations of GDPR are not well-settled.

As a result, this paper is provided for informational purposes only and should not be relied upon as legal advice or to determine how GDPR might apply to you and your organization. We encourage you to work with a qualified legal professional to discuss GDPR, how it applies specifically to your organization, and how best to ensure compliance.

Introduction

On May 25, 2018, a new privacy law called the General Data Protection Regulation (GDPR) went into effect in the European Union (EU). It replaces the Data Protection Directive (Directive''), which had been in effect since 1995. While the GDPR preserves many of the principles established in the Directive, the GDPR gives individuals greater control over their personal data and imposes many new obligations on organizations that collect, handle, or process personal data.

Ex Libris is committed to GDPR compliance across all of our products and services. We have closely analyzed the requirements of the GDPR, and our engineering, product, security and legal teams have been working to align our procedures, documentation, contracts and services to support compliance with the GDPR. We also support our customers with their GDPR compliance journey with our strong foundation of certified security and privacy controls.

This paper describes processes and capabilities built into campusM that can assist your organization in addressing data subject rights and requests as a *controller* under the GDPR of personal data processed on campusM.

Definitions

Personal Data means any information relating to an identified or an 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 person.

Controller means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data. Where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law. With respect to the use of Alma, the customer is the **controller**.

Processor means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller. With respect to the use of campusM, Ex Libris is the **processor**.

Data Subject is an identified or an identifiable natural person to whom personal data relates (e.g., users and staff).

As you read through this paper, keep in mind that your compliance with the GDPR involves your role as the **controller** and Ex Libris as the **processor**.

Summary of Data Subject Rights

The rights of data subjects provided by the GDPR include the following:

1. *Right to be Informed (Article 13, 14 GDPR)*

The right to be informed encompasses your obligation to provide '*fair processing information*', typically through a privacy notice. It emphasizes the need for transparency over how you use personal data.

2. *Right of Access (Article 15 GDPR)*

Under the GDPR, individuals have the right to obtain:

- Confirmation that their data is being processed
- Access to their personal data; and
- Other categories of information - some of which should be provided by the controller in a privacy notice (see Article 15).

3. *Right to Rectification (Article 16 GDPR)*

Individuals are entitled to have their personal data rectified if it is inaccurate or incomplete without undue delay. If you have disclosed the personal data in question to third parties, you must inform such third parties of the rectification unless this proves impossible or involves disproportionate effort. You must also inform the individuals about the third parties to whom the data has been disclosed where requested.

4. *Right to Erasure (Article 17 GDPR)*

This right is also known as the *Right to be Forgotten*. It enables an individual to request the deletion or removal of personal data where there is no compelling reason for its continued processing.

Individuals have the right to have their personal data erased and to prevent further processing of their personal data in specific circumstances delineated in the GDPR, such as:

- Where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed.

- When the processing was based on consent, and the individual has now withdrawn their consent.
- When the individual objects to processing and there are no overriding legitimate grounds for continuing the processing.
- The personal data was unlawfully processed.
- The personal data has to be erased in order to comply with a legal obligation in Union or Member State law to which the controller is subject.

There are circumstances described in the GDPR where the right to erasure may not apply and a controller can resist a request for erasure.

5. *Right to Restrict Processing (Article 18 GDPR)*

When this right is exercised you are permitted to store the personal data but not further process it. The *Right to Restrict Processing* applies in the specific circumstances set forth in the GDPR, including:

- Where an individual contests the accuracy of the personal data, then processing should be restricted for a period enabling the controller to verify the accuracy of the personal data.
- When processing is unlawful and the individual opposes erasure and requests restriction instead.
- If you no longer need the personal data but are required by the individual to establish, exercise or defend a legal claim.
- Where an individual has objected to processing for reasons specified in the GDPR, pending the verification whether the legitimate grounds of the controller override those of the individual.

6. *Right to Data Portability (Article 20 GDPR)*

This right allows individuals to receive the personal data the individual provided to a controller in a structured, commonly used and machine-readable format and to transmit such data to another controller, without hindrance from the original controller. In exercising this right, the individual shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

The *Right to Data Portability* applies where the individual has given consent to the processing of their personal data for one or more specific purposes, or where processing is carried out by automated means or in other circumstances specified in the GDPR.

7. *Right to Object (Article 21 GDPR)*

Individuals have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data which is based on certain specified provisions of the GDPR, including profiling based on those provisions.

8. *Right Related to Automated Decision Making and Profiling (Article 22 GDPR)*

The GDPR provides safeguards for individuals against the risk that a potentially damaging decision is taken without human intervention.

Individuals have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning the individual or similarly significantly affects the individual. The GDPR provides certain exceptions and conditions to this right.

9. *Right Related to Data Breach Notification (Article 34 GDPR)*

The GDPR introduces a duty on controllers to report certain types of data breaches to the relevant supervisory authority, and in some cases to the individuals affected by the breach.

A personal data breach is a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed. Where a breach is likely to result in a high risk to the rights and freedoms of natural persons, the controller is required to communicate the personal data breach to the data subjects without undue delay.

Addressing GDPR Data Subject Rights with campusM

The following section describes the capabilities of campusM that can assist customers in complying with the rights of data subjects.

campusM processes two user types: app users, such as students, staff, and alumni, and administrators, who manage the app based on their assigned roles. For app users, campusM processes personal information as well as audit information that reflects user activity in the system. For administrators, campusM processes credentials and permissions.

1. Rights of Data Subjects – App Users

Data Subject Right	Corresponding campusM Functionality
Right to be Informed	Ex Libris provides comprehensive documentation regarding campusM. Upon request, Ex Libris will provide you with additional relevant information you may need for addressing the Right to be Informed in relation to the processing of personal data by campusM.
Right to Access	<p>Personal Information</p> <p>Much of the information processed by campusM is data that is stored and managed in other systems maintained by the Institution (for example, in a Student Information System which is loaded into campusM and synchronized on a regular basis. The information includes general Information such as name, email address and roles.</p> <p>It is not possible to update the information from other systems from within campusM. Only registered guest information can be updated.</p> <p>Audit on user activity in the system</p> <p>campusM maintains different types of audit information on user activity in the system regarding functionality and security.</p> <p>The information is collected for one of the following reasons:</p> <ul style="list-style-type: none">• Insight analytics for the institution - to analyze and improve the user experience, the university can track the behavior of its users without user identifiers. <p>This information includes device type, hit type, and hit description.</p> <ul style="list-style-type: none">• Additional services to the institution, such as feedback information; and to the end users, such as attendance service and alerts.

This information includes device data, beacon location, events, and alerts information.

For a full list of audit data see section Data fields on user in campusM below.

Note that campusM stores all notification content sent to users, allowing the users to delete notifications using their campusM user interface. It is important to note that the Data Controller (institution) creates the content (title and body) of the notification, and is responsible for ensuring that it does not include sensitive data, as or special categories of data as described in Article 9(1) of the GDPR, or any other data prohibited by the Agreement.

In response to a request made by a user to see their data, open a Salesforce ticket under campusM with the following information:

- Asset – campusM
- Priority – High
- Title - “Export user information”
- Description – should include the user name last name and email addresses (all the emails that exist in the university records).

Right to Rectification	<p>Because most of the personal data is imported from external systems that update campusM, the rectification should be done in the originating systems (for example VLE, Student Information System, etc.)</p> <p>Registered guests can change their first name, last name and email from the app under Personal Details.</p> <p>To change Audit information, such as attendance data, the end user should contact the University who would then open a Salesforce ticket with the following information:</p> <ul style="list-style-type: none"> • Asset – campusM • Priority – High • Title - “Update user information” • Description – should include the user name, last name and email addresses (all the emails that exist in the university records) and the data that should be updated.
Right to Erasure (Right to be Forgotten)	<p>Where a request has been made by a user to delete their information, open a Salesforce ticket under campusM with the following information:</p> <ul style="list-style-type: none"> • Asset – campusM • Priority – High • Title - “Delete user” • Description – should include the user name, last name and the user email addresses (all the emails that exist in the university records).
Right to Restrict Processing	<p>Should a Data Subject object to the processing of their personal data, the individual’s campusM user record may be deleted, as described above.</p>

Right to Data Portability	<p>campusM allows institutions to request the export of personal data, which will be provided in standard formats. Open a ticket in Salesforce.</p> <p>In response to a request made by a user to export their data, open a Salesforce ticket under campusM with the following information:</p> <ul style="list-style-type: none"> • Asset – campusM • Priority – High • Title - “Export user information” <p>Description – should include the user name last name and email addresses (all the emails that exist in the university records).</p>
Right to Object	<p>Users that exercise their “right to object” may be deleted from the campusM as described above.</p>
Right related to Automated Decision Making and Profiling	<p>Any profiling or automated decision-making is determined and set by the customer. Generally, reports in campusM are designed to be used by humans for decision making, while roles and profiles are determined by the Data Controller based on information provided from the Data Controller’s systems.</p>

**Right related to
Data Breach
Notification**

Ex Libris has procedures for data breach handling including notification. In the case of a personal data breach, Ex Libris will, as soon as possible and within 72 hours after having become aware of it, notify the customer.

The notification will:

- Describe the nature of the personal data breach
- Communicate the name and contact details of the data protection officer
- Describe the likely consequences of the personal data breach
- Describe the measures taken or proposed to be taken by Ex Libris

When required by the GDPR, the institution/library as Data Controller, is responsible for notifying the Supervisory Authorities and the affected data subjects.

Ex Libris Security Incident Response Policy is available in the Ex Libris Knowledge Center - [here](#)

2. Rights of Data Subjects – Staff

The following section describes the capabilities of campusM that can assist customers in complying with the rights of the data subjects with respect to its staff.

Data Subject Right	Corresponding campusM Functionality
Right to be Informed	Ex Libris provides comprehensive documentation regarding campusM. Upon request, Ex Libris will provide you with additional relevant information you may need for addressing the Right to be Informed in relation to the processing of personal data by campusM.
Right to Access	Staff user information can be viewed by Staff depending on their individual level of access authority. To view or delete Staff information, the individual should contact the app administrator.
Right to Rectification	In order to view or Edit staff information, the staff user can either access the App manager and update his details through “Users/Permissions” option or should contact the app administrator.
Right to Erasure (Right to be Forgotten)	To delete Staff information, the individual should contact the app administrator.
Right to Restrict Processing	Should a staff user to the processing of their personal data, the individual’s campusM user record may be deleted, as described above

<p>Right to Data Portability</p>	<p>campusM allows institutions to request the export of staff personal data , which will be provided in standard formats. Open a ticket in Salesforce.</p> <p>In response to a request made by a user to export their data, open a Salesforce ticket under campusM with the following information:</p> <ul style="list-style-type: none"> • Asset – campusM • Priority – High • Title - “Export staff user information” <p>Description – should include the user name last name and email addresses (all the emails that exist in the university records).</p>
<p>Right to Object</p>	<p>Staff Users that exercise their “right to object” may be deleted from the campusM as described above.</p>
<p>Right related to Automated Decision Making and Profiling</p>	<p>No Profiling or automated decision making are done based on staff data.</p>
<p>Right related to Data Breach Notification</p>	<p>Ex Libris has procedures for data breach handling including notification. In the case of a personal data breach, Ex Libris will, as soon as possible and within 72 hours after having become aware of it, notify the customer.</p> <p>The notification will:</p> <ul style="list-style-type: none"> • Describe the nature of the personal data breach • Communicate the name and contact details of the data protection officer • Describe the likely consequences of the personal data breach • Describe the measures taken or proposed to be taken by Ex Libris <p>When required by the GDPR, the institution/library as Data Controller, is responsible for notifying the Supervisory Authorities and the affected data subjects.</p> <p>Ex Libris Security Incident Response Policy is available in the Ex Libris Knowledge Center - here</p>

Data fields on User in campusM

Category	Field
General Information	First name
	Last name
	Email address
	Username
	Role name
	Role description
Device Data	Device identifier
	Platform
	Model
Alerts Data	Notification title
	Content
	Device identifier
In-App Feedback	Page title
	Feedback text
Insight Usage Data	Hit type
	Hit description
	URL
	Device data
	IP address
App manager administrator's data	First name
	Last name
	Email address
	App manager username
	App manager password

Category	Field
Attendance data*	Email address
	Date/time of transaction
	Event information
	Geolocation at the point of check in*
	Visible iBeacon identifiers at the point of check in*
	Check-in type
	User-selected Absence reasons
	IP address
Directory data*	First name
	Last name
	Email address
	Office location
Quick Polls Data*	Email address
	Quick Poll information
	Date/time of transaction
	User-selected Quick Poll response
	Free Texted entered by user in response to Free Test question type*
Contact Tracing Data*	Email Address
	Date/time of transaction
	Scanned Location Data encoded in QR Code. May include one of more of the following Fields:
	<ul style="list-style-type: none"> - Location Name - Location ID - Campus ID - 2 x Optional data items
Events Data*	Email address
	Event Information
	Event Date

*Data items only collected if the functionality is enabled by the app administrator for their campusM app implementation.