

## UXP Data Privacy tools as a helping hand to comply with the GDPR

### Article 5

1. Personal data shall be:
  1. processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency');

The implementation of Consent Management System (CMS) and Access Tracking (ATR) ensures that the data moved over the UXP is traceable and the citizen has the opportunity to deny or allow access to their data to the respective organizations.

2. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with Article 89(1), not be considered to be incompatible with the initial purposes ('purpose limitation');

In the CMS, "Purpose" is used for each permission request, i.e., the citizen's data can only be requested if there is a defined purpose that is understandable to the citizen.

3. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');

Only the data can be requested to which the citizen has given their consent.

4. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality').

Data exchange is taking place in UXP, which means that the data can only travel through secure servers.

## Article 7

1. Where processing is based on consent, the controller shall be able to demonstrate that the data subject has consented to processing of his or her personal data.

The approval and disapproval of the consent is being saved in the logs.

2. If the data subject's consent is given in the context of a written declaration which also concerns other matters, the request for consent shall be presented in a manner which is clearly distinguishable from the other matters, in an intelligible and easily accessible form, using clear and plain language. Any part of such a declaration which constitutes an infringement of this Regulation shall not be binding.

The consent is being requested as per a predefined purpose.

3. The data subject shall have the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. Prior to giving consent, the data subject shall be informed thereof. It shall be as easy to withdraw as to give consent.

The user can revoke their consent in the system.

## Article 13

1. Where personal data relating to a data subject are collected from the data subject, the controller shall, at the time when personal data are obtained, provide the data subject with all of the following information:
  1. the identity and the contact details of the controller and, where applicable, of the controller's representative;

The service provides the name of an organisation that has requested the data, but without the contact details of said organisation.

2. the contact details of the data protection officer, where applicable;
3. the purposes of the processing for which the personal data are intended as well as the legal basis for the processing;

The purpose has to be defined in order to request the data.

## Article 15

1. The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:

1. the purposes of the processing;

The purpose must be defined.

2. the categories of personal data concerned;
3. the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;

The service will show who sent the data and where the data has been sent.

## Article 17

The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:

1. the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
2. the data subject withdraws consent on which the processing is based according to point (a) of Article 6(1), or point (a) of Article 9(2), and where there is no other legal ground for the processing;

In case the citizen does not give their consent or revokes their consent, the data cannot be requested anymore.

## Article 25

1. Taking into account the state of the art, the cost of implementation and the nature, scope, context and purposes of processing as well as the risks of varying likelihood and severity for rights and freedoms of natural persons posed by the processing, the controller shall, both at the time of the determination of the means for processing and at the time of the processing itself, implement appropriate technical and organisational measures, such as pseudonymisation, which are designed to implement data-protection principles, such as data minimisation, in an effective manner and to integrate the necessary safeguards into the processing in order to meet the requirements of this Regulation and protect the rights of data subjects.

The secure transfer of data is ensured by secure servers and the citizen can choose which data can be transferred.

2. The controller shall implement appropriate technical and organisational measures for ensuring that, by default, only personal data which are necessary for each specific purpose of the processing are processed. That obligation applies to the amount of personal data collected, the extent of their processing, the period of their storage and their accessibility. In particular, such measures shall ensure that by default personal data are not made accessible without the individual's intervention to an indefinite number of natural persons.

The main purpose of the CMS is to help fulfill this article.