

GDPR COMPLIANCE FOR VISIOLINK SOLUTIONS

TERRITORIAL SCOPE
 EU Establishments
 Non-EU Established Organizations (Offer goods or services or engaging in monitoring within the EU)

THE PLAYERS
 Data Subjects
 Data Controllers
 Data Processors
 Supervisory Authorities

PERSONAL DATA
 Identified
 Identifiable

SENSITIVE DATA
 Religious or Philosophical Beliefs
 Trade Union Membership
 Political Opinions
 Racial or Ethnic Origin
 Genetic Data
 Biometric Data
 Sex Life
 Health

RESPONSIBILITIES OF DATA CONTROLLERS AND PROCESSORS
 Security
 Data Protection Officer (DPO) (Designate DPO if core activity involves regular monitoring or processing large quantities of personal data)
 Record of Data Processing Activities (Maintain a documented register of all activities involving processing of EU personal data)
 Data Protection by Design (Built in starting at the beginning of the design process)
 Data Impact Assessment (For high risk situations)

LAWFUL PROCESSING
 Collection and processing of personal data must be for "specified, explicit and legitimate purposes" – with consent of data subject or necessary for:
 • performance of a contract
 • compliance with a legal obligation
 • to protect a person's vital interests
 • task in the public interest
 • legitimate interests

CONSENT
 Consent must be freely given, specific, informed, and unambiguous.

RIGHTS OF DATA SUBJECTS
 Automated Decision Making (Right not to be subject to a decision based solely on automated processing, including profiling)
 Transparency
 Access and Rectification
 Right to Erasure
 Purpose Specification and Minimization
 Right to Data Portability

ENFORCEMENT
 Fines (Up to 20 million euros or 4% of total annual worldwide turnover, less serious violations: Up to 10 million euros or 2% of total annual worldwide turnover)
 Effective Judicial Remedies (Compensation for material and non-material harm)

INTERNATIONAL DATA TRANSFER
 Adequate Level of Data Protection
 Binding Corporate Rules (BCRs)
 Privacy Shield
 Model Contractual Clauses

GDPR

DATA BREACH NOTIFICATION
 "If personal data breaches (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)."
 If likely to result in a high privacy risk → notify data subjects
 Notify supervisory authority no later than 72 hours after discovery.

TEACHPRIVACY www.teachprivacy.com Workforce awareness training by Prof. Daniel J. Solove. Please ask permission to reuse or distribute.

GDPR compliance

All Visiolink solutions are linked to Google Analytics and/or other tracking types making them subject to the new General Data Protection Regulation (GDPR) that comes into effect May 25, 2018

Personal data is also processed and stored temporarily when the user is validated



Tracking options in Visiolink solutions



Google Analytics

INFOOnline
Digital Audience Measurement

 celeraOne

 comSCORE.

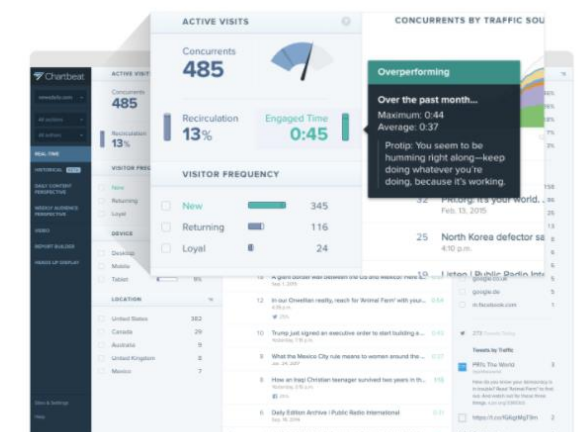
 Firebase Analytics

 Adobe Analytics

mixpanel

 **Linkpulse**
A plista Company

 Chartbeat



Phase 1: Necessary updates

To protect your readers' data and comply with GDPR, an upgrade of your desktop solutions and apps must contain:

1. Information to the user about tracking-data
2. An opt-out function
3. Privacy Policy



Phase 2: SSO integrated GDPR (optional)

Visiolink's standard GDPR-upgrade will be sufficient to ensure compliance before May 2018.

If you would like to offer granular consent options to your readers on your website, a custom integration to your ePaper solutions is fully possible.

Kindly provide a technical specification for a phase 2 implementation.

Keep in touch with us

Please tick the boxes below to tell us all the ways you would prefer to hear from us:

- Yes please, I would like to receive communications by email
- Yes please, I would like to receive communications by telephone
- Yes please, I would like to receive communications by mobile (text message)
- No thank you, I **do not** wish to receive communications by post



Users need to be informed

Explicit information about Google Analytics tracking will have to be presented at the first communication with the user

cf. GDPR Article 21:

(4) At the latest at the time of the first communication with the data subject, the right referred to in paragraphs 1 and 2 shall be explicitly brought to the attention of the data subject and shall be presented clearly and separately from any other information.



Desktop: Information to the user about tracking-data

A Pop-up Screen appears the very first time the user opens the paper or magazine.

This will provide the user with information about what type of tracking is used, and where the tracking can be disabled (the 'Opt-out Function')



"We use data to improve your experience of our webpage, assess the use of specific content, and to support advertising. If you prefer that we don't use your data, you can disable tracking at the bottom of the navigation guide. Read more in the Privacy Policy on our website."

The wording of the pop up message can be changed and customized upon request at any time

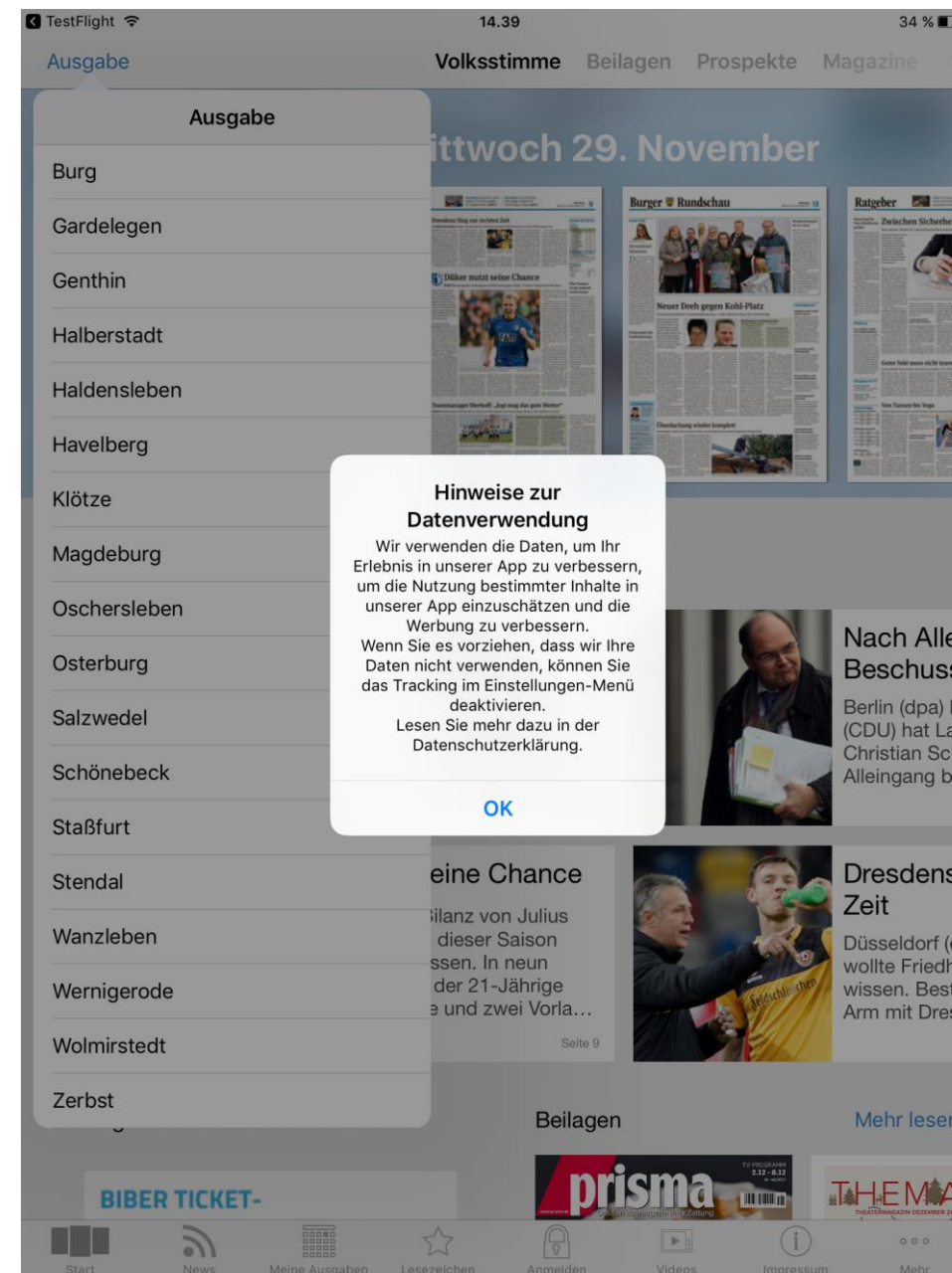


Device: Information to the user about tracking-data

When opening the app the first time after the upgrade, the reader will see an information pop up.

This will provide the user with information about what type of tracking is used, and where the tracking can be disabled (the 'Opt-out Function')

The wording of the pop up message can be changed and customized upon your request at any time. No resubmit required after the upgrade.



“We use data to improve your experience of our app, assess the use of specific content in our app, and to support advertising. If you prefer that we don't use your data, you can disable tracking in the settings menu. Read more in the Privacy Policy”



Desktop translations

Information to the user about tracking-data

- We use data to improve your experience of our webpage, assess the use of specific content, and to support advertising. If you prefer that we don't use your data, you can disable tracking at the bottom of the navigation guide. Read more in the Privacy Policy on our website.
- Vi bruger data til at forbedre din oplevelse på vores hjemmeside, vurdere brugen af specifikt indhold samt understøtte reklamer. Hvis du foretrækker at vi ikke bruger dine data, kan du deaktivere sporing i bunden af navigationsguiden. Læs mere i privatlivspolitikken på vores hjemmeside.
- We gebruiken gegevens om uw ervaring met onze webpagina te verbeteren, het gebruik van specifieke inhoud te beoordelen en om adverteerders te ondersteunen. Als u liever heeft dat we uw gegevens niet gebruiken, kunt u traceren uitzetten onderaan de navigatiegids. Lees meer in het privacybeleid op onze website.
- Käytämme tietoja parantaaksemme verkkosivun käyttäjäkokemustasi, arvioidaksemme tiettyjen sisältöjen käyttöä ja tukeaksemme mainontaa. Jos haluat, ettemme käytä tietojasi, voit ottaa jäljityksen pois käytöstä siirtymisoppaan alareunasta. Voit lukea yksityisyyskäytännöistämme lisää verkkosivuiltamme.
- Wir verwenden die Daten, um Ihre Erfahrungen mit unserer Webseite zu verbessern, die Nutzung bestimmter Inhalte auszuwerten und um die Werbung zu verbessern. Wenn Sie es vorziehen, dass wir Ihre Daten nicht verwenden, können Sie das Tracking am Ende des Navigationsleitfadens deaktivieren. Mehr dazu erfahren Sie in der Datenschutzerklärung auf unserer Website.
- Vi bruker data for å forbedre opplevelsen du har på nettsiden vår, vurdere bruken av spesifikt innhold og for å støtte annonser. Hvis du foretrekker at vi ikke bruker dine data, kan du deaktivere sporingen på bunn av navigasjonsguiden. Les mer i retningslinjene for personvern på nettstedet vårt.
- Vi använder data för att förbättra din upplevelse på vår webbplats, bedöma användningen av specifikt innehåll och som stöd för annonser. Om du inte vill att vi använder dina data kan du inaktivera spårning längst ned på navigeringssidan. Du hittar mer information i vår sekretesspolicy på webbplatsen.



Device translations

Information to the user about tracking-data

- We use data to improve your experience of our app, assess the use of specific content in our app, and to support advertising.↵ If you prefer that we don't use your data, you can disable tracking in the settings menu.↵ Read more in the Privacy Policy.
- Vi bruger data til at forbedre din oplevelse af vores app, vurdere brugen af specifikt indhold og til at støtte markedsføring. Hvis du foretrækker at vi ikke bruger din data, kan du slå det fra under indstillinger. Læs mere under Privacy Policy.
- We gebruiken data om uw ervaring van onze app te verbeteren, het gebruik van specifieke content in de app te beoordelen en om reclame te ondersteunen. Als u wenst dat we uw data niet gebruiken, kunt u tracking uitschakelen in de instellingen. Lees meer in het Privacybeleid.
- Käytämme dataa parantaaksemme kokemustasi sovelluksestamme, arvioidaksemme tietyn sisällön käyttöä sovelluksessa ja tukeaksemme mainostusta. Jos et halua, että käytämme dataasi, voit lopettaa seurannan asetuksista. Lue lisää yksityisyyskäytännöstä.
- Wir verwenden die Daten, um Ihr Erlebnis in unserer App zu verbessern, um die Nutzung bestimmter Inhalte in unserer App einzuschätzen und die Werbung zu verbessern. Wenn Sie es vorziehen, dass wir Ihre Daten nicht verwenden, können Sie das Tracking im Einstellungen-Menü deaktivieren. Lesen Sie mehr dazu in der Datenschutzerklärung.
- Vi bruker data for å forbedre din opplevelse av appen vår, vurdere bruken av spesifikt innhold i appen og til å støtte annonsering. Dersom du foretrekker at vi ikke bruker dine data, kan du deaktivere sporing i menyen for innstillinger. Les mer i vår personvernerklæring.
- Vi använder data för att förbättra din upplevelse av vår app, bedöma användningen av specifikt innehåll i vår app och för att stödja annonsering. Om du föredrar att vi inte använder din data kan du avaktivera spårning i inställningsmenyn. Läs mer i sekretesspolicyn.



Users must have the possibility to Opt out

An opt out feature is required for Google Analytics and other types of tracking both with and without User-ID, cf. Article 21

- The pop-up message discloses exactly where tracking can be disabled, as well as informs the user about the tracking. The 'Opt-out Function' is going to be a check box that by default is checked (meaning tracking is enabled).
- When a user deactivates tracking, no user data or anonymous data will be collected from that user on the device on which the deactivation was made.
- If the user uses multiple devices, he or she will have to disable tracking on each of the devices, just as they will be exposed to the pop-up screen on each device, when they install the app and open it for the first time.
- Deactivation won't affect data generated by the user prior to the action. Should the user decide to enable the tracking again, the data will start generating the same way it did before. In regards to the period in which tracking was switched off, it will look as if the user hasn't used the solution during this period.



Desktop: opt out

Opt out is located in the navigation guide

The screenshot shows a 'NAV GUIDE' window with the following content:

- Brug højre/venstre-tasterne til at bladre**: Illustration of left and right arrow keys.
- Åbn en artikel ved at klikke én gang på en markeret artikel**: Illustration of a mouse click and a laptop with a blue dot.
- Zoom ind ved at dobbeltklikke**: Illustration of a mouse double-click and a laptop with a blue double-click icon.
- Zoom ind ved at scrolle med musehjulet eller på trackpad'en**: Illustration of a mouse scroll wheel and a trackpad with vertical scroll arrows.
- Zoom ind til det dybeste zoomniveau (5) med 'Home'-tasten, og tryk på 'End'-tasten for at zoome til niveau 1. Tryk fn+højre/venstre på Mac**: Illustration of Home, End, and function keys.
- Zoom ved at bruge 'Page Up'/'Page Down' på PC eller fn+op/ned på Mac**: Illustration of Page Up, Page Down, and function keys.
- Zoom mellem de fem zoomniveauer ved at trykke på tasterne 1, 2, 3, 4 og 5**: Illustration of number keys 1-5.
- Når du har zoomet ind, kan du bruge pilene til at navigere rundt på siden**: Illustration of arrow keys.

At the bottom of the window, a red box highlights the checkbox: **Tillad at data bliver indsamlet for at forbedre vores app og til markedsføring**

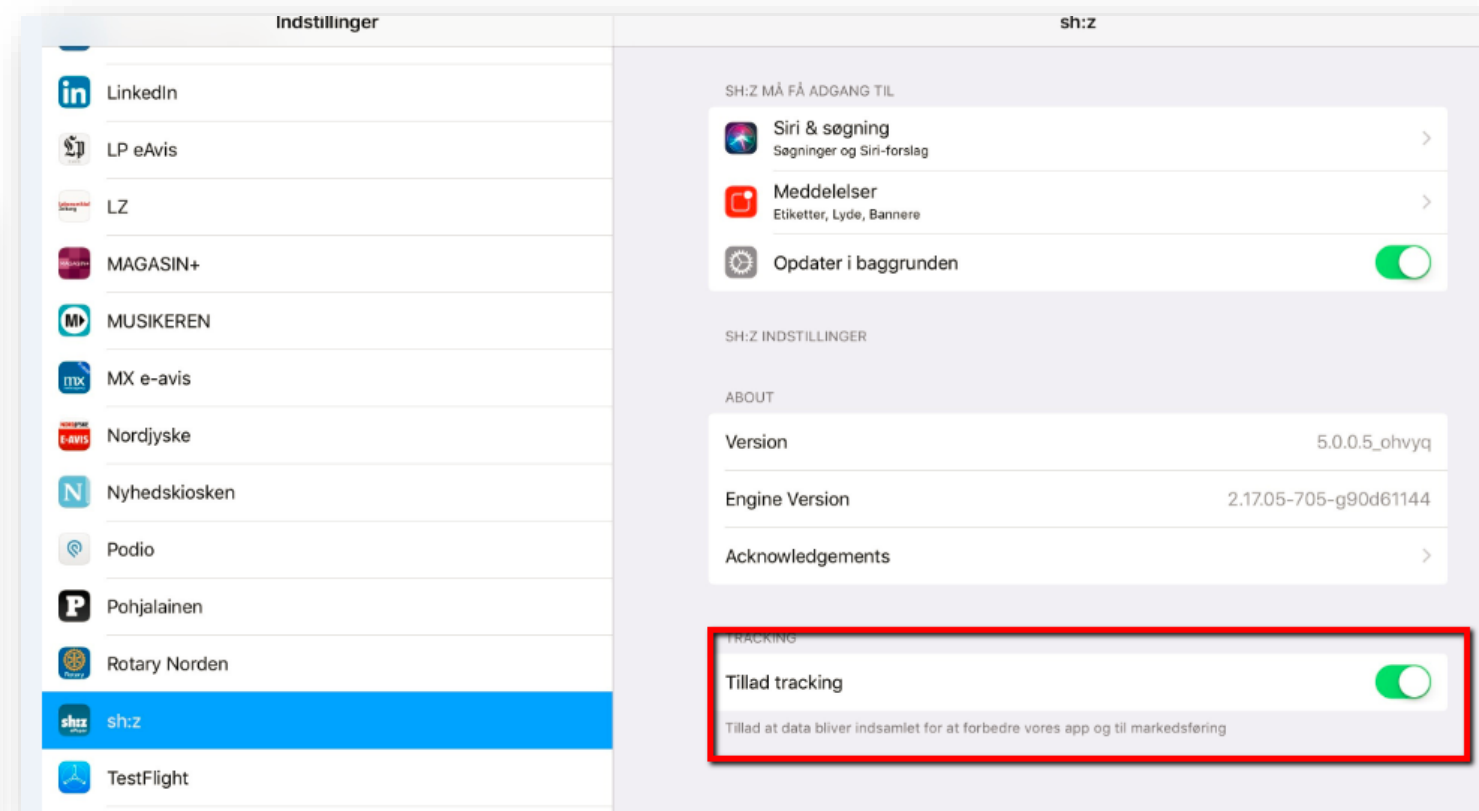
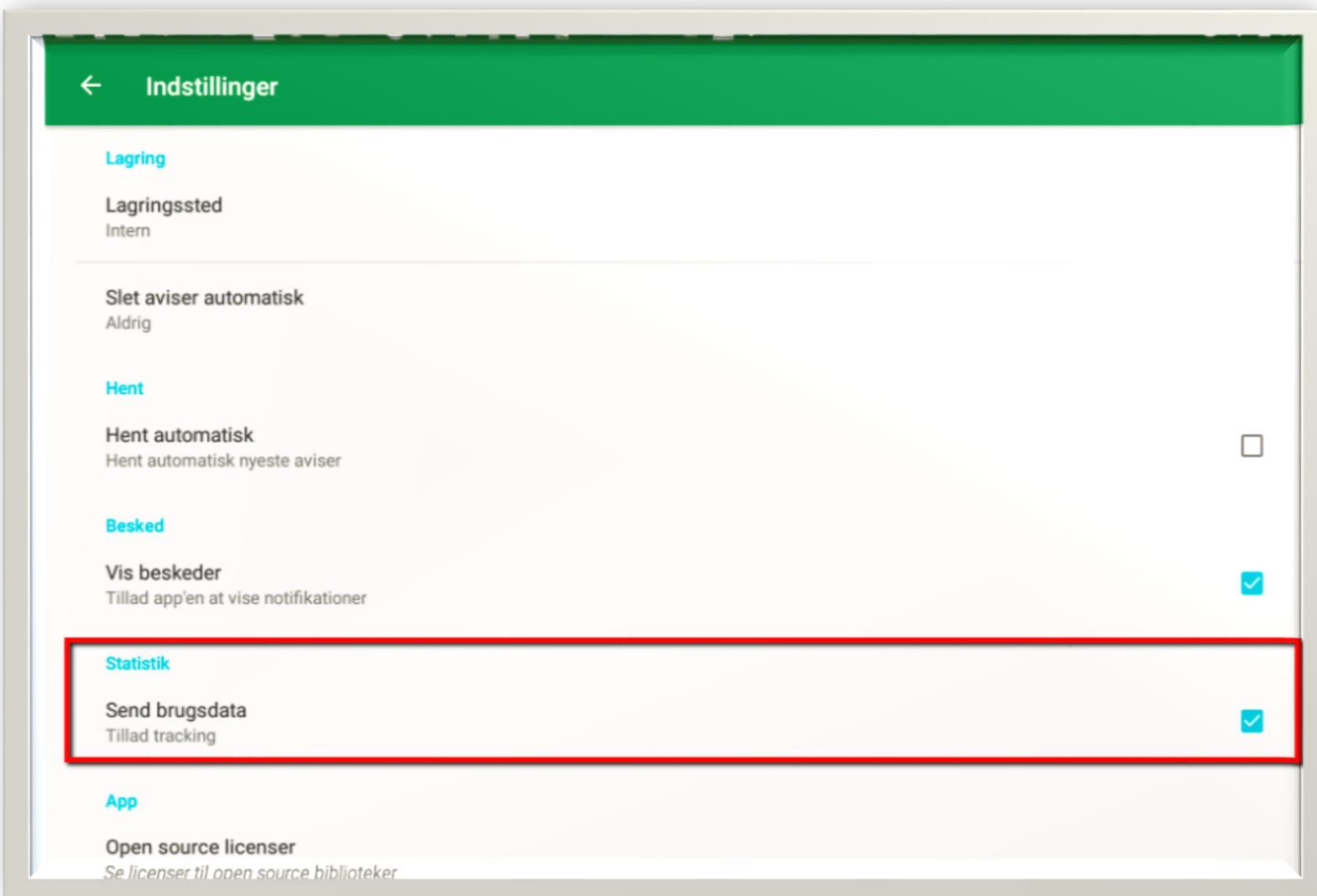
A red arrow points to the information icon (i) in the right-hand navigation bar.

“ Allow data collection to help us improve this solution and for advertising purposes”



iOS and Android: Opt out

Opt out is located under settings

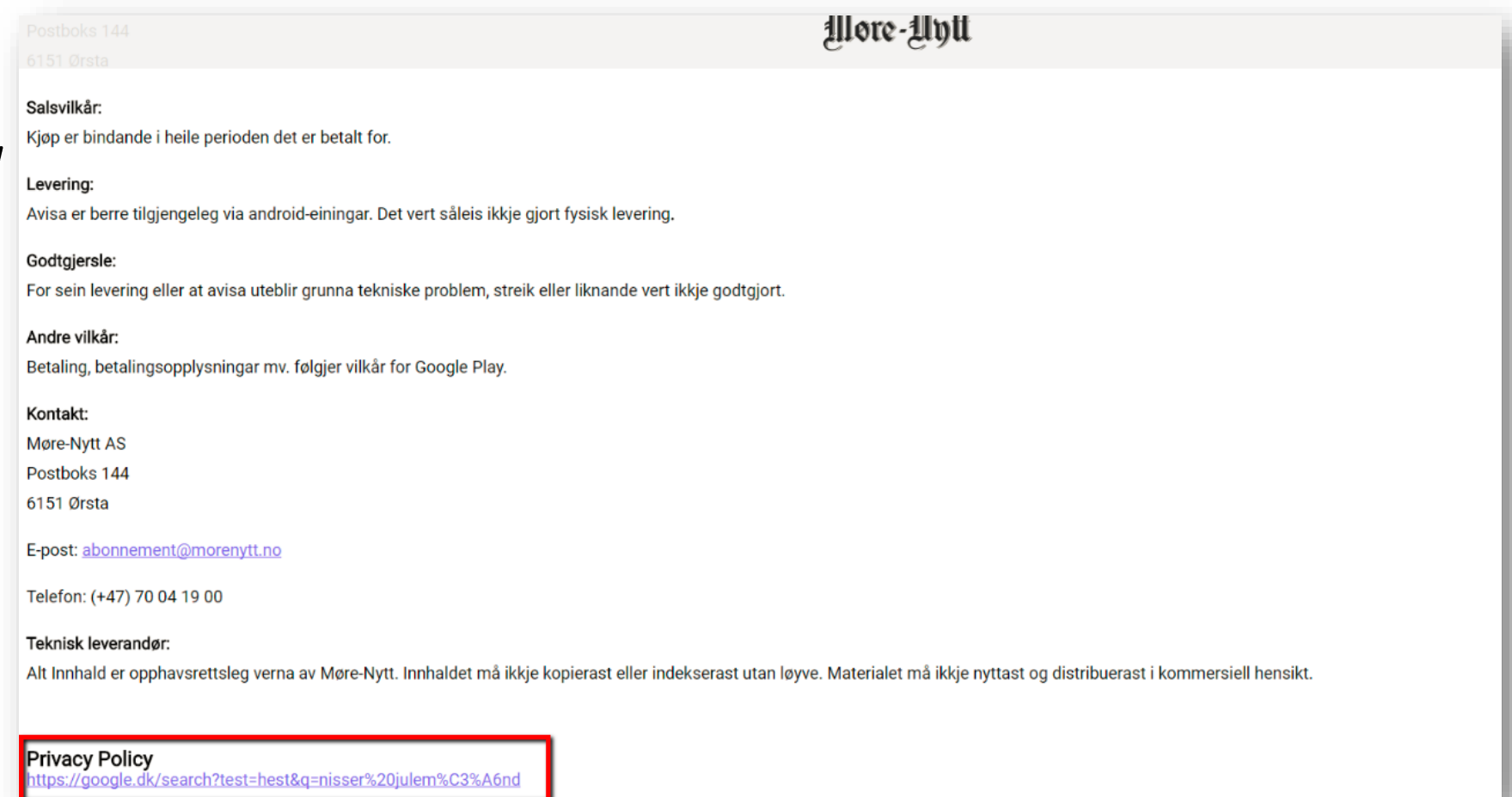


“ Allow data collection to help us improve the app and for advertising purposes”



Privacy Policy

- The Privacy Policy can be found in the Information view on iOS and Android
- The Privacy Policy should be updated with information about login data



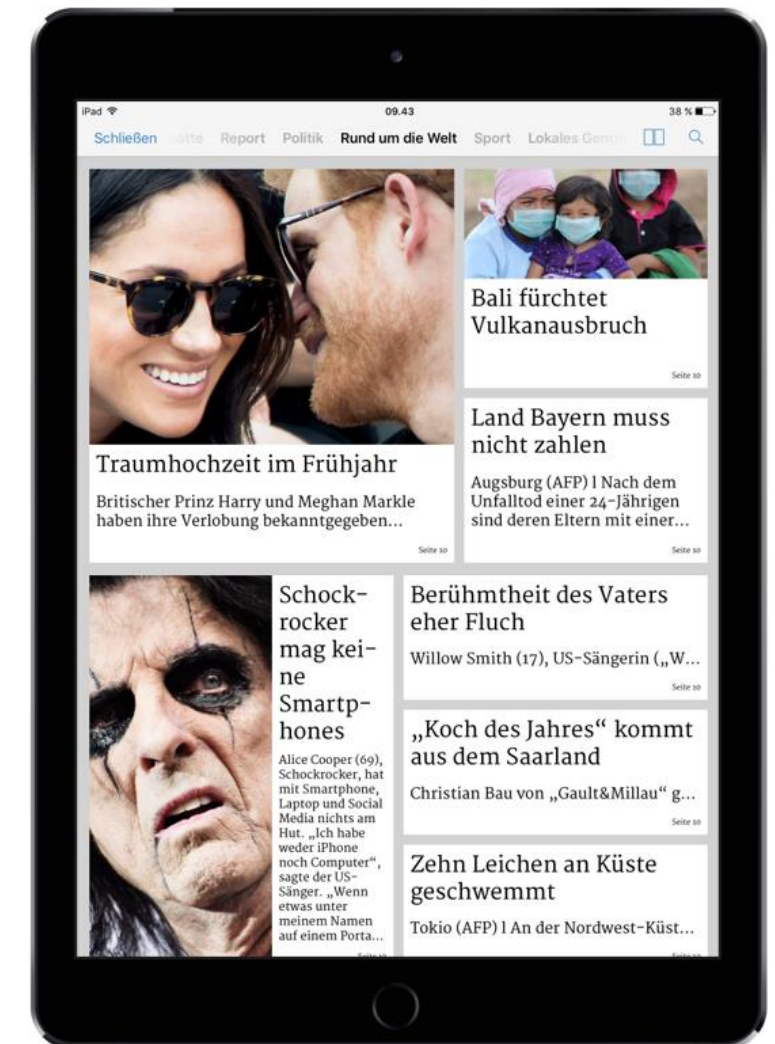
The screenshot shows a mobile application interface for 'Møre-Nytt'. At the top right, the logo 'Møre-Nytt' is visible. Below the header, there is a section titled 'Salsvilkår:' with the text 'Kjøp er bindande i heile perioden det er betalt for.' followed by 'Levering:' with 'Avisa er berre tilgjengeleg via android-einingar. Det vert såleis ikkje gjort fysisk levering.' and 'Godtgjersle:' with 'For sein levering eller at avisa uteblir grunna tekniske problem, streik eller liknande vert ikkje godtgjort.' Below this is 'Andre vilkår:' with 'Betaling, betalingsopplysningar mv. følger vilkår for Google Play.' and 'Kontakt:' with 'Møre-Nytt AS', 'Postboks 144', '6151 Ørsta', 'E-post: abonnement@morenytt.no', and 'Telefon: (+47) 70 04 19 00'. At the bottom, there is a section 'Teknisk leverandør:' with the text 'Alt Innhald er opphavsrettsleg verna av Møre-Nytt. Innhaldet må ikkje kopierast eller indekserast utan løyve. Materialet må ikkje nyttast og distribuerast i kommersiell hensikt.' A red box highlights a link labeled 'Privacy Policy' with the URL 'https://google.dk/search?test=hest&q=nisser%20julem%C3%A6nd'.



The upgrade brings other improvements and changes

When upgrading to the GDPR-compliant version of the app, all improvements, fixes and changes that have been made since the app was last upgraded will come along as a bonus. Especially two improvements for iOS are important to notice:

- iOS 9 will be the minimum required iOS version that will be able to upgrade to the new version. Less than 3 % of users across all our customers' iOS apps use an iOS version lower than 9.0
- A new article overview has been added to help the readers selecting the most interesting articles. Read more here: <http://support.visiolink.com/hc/en-us/articles/115003982053-New-iOS-article-overview->



Data Processing Agreement

- A DPA is juridically required for our customers to provide Visiolink with personal data from the build-in trackers and log-in data, and is juridically required for Visiolink to process this data.
- Our customers will serve as "Data Controllers" for both the log-in-data and tracking-data, and Visiolink will be "Data Processors". The DPA has specific contractual requirements.
- As "Data Processors", Visiolink will, among other things, be required to notify our customers – "Data Controllers" - of any data breach on our side which may compromise personal data of users.
- All customers will be contacted concerning the DPA.



PART 1: DESCRIPTION OF PROCESSING OF PERSONAL DATA

Part 1 of the Agreement constitutes the Controller's instruction to the Processor.

Subject-matter and duration of the processing

The Controller hereby instructs the Processor to collect and process data for the following purpose(s):	
Description of the data processing activities (e.g. by referring to any underlying service agreement):	Click or tap here to enter text.

Upon termination of this Agreement, the Personal Data must be:		
	Yes	No
deleted irretrievably so that it is no longer possible to uniquely identify natural persons	<input type="checkbox"/>	<input type="checkbox"/>
returned to the Controller	<input type="checkbox"/>	<input type="checkbox"/>

Nature and purpose of the processing

The Processor is permitted to collect and process the Personal Data for the following purpose(s):	
Description of purpose(s):	Click or tap here to enter text.
as well as any other purposes instructed by the Controller in writing.	

Categories of Personal Data

The processing includes Personal Data of the categories checked off below. The security measures put in place by the Processor and any Sub-Processors must provide a level of security appropriate to the risk represented by the sensitivity of the Personal Data.



Users have the “right to be forgotten”

If an end-user withdraws his or her consent, they will be allowed to have their tracked data erased, cf. Article 17

- Login data is stored by Visiolink for 30 days only. Contact support@visiolink.com to handle specific end user requests
- Google Analytics does not offer a feature that makes it possible to delete specific end-user data at the moment. According to Google, this will be implemented by May 2018: *“In terms of data deletion, by May 2018 Google Analytics will offer support for customers that wish to delete specific end-user data based on User-ID or Client-ID.”*



Read more

- <https://blog.visiolink.com/new-data-protection-regulation-how-it-will-affect-epaper-publishers>
- <https://blog.visiolink.com/gdpr-and-google-analytics-how-you-can-continue-with-user-tracking>
- <http://support.visiolink.com/hc/en-us/articles/115005473785-How-will-GDPR-affect-your-Visiolink-solutions>
- FAQ: <https://info.visiolink.com/faq-about-gdpr>
- [Join our customer forum to continue the discussion about GDPR in Slack](#)

