

Personal Data – Regulation, Control, and Removal: A Solution for GDPR Compliance for EBS

Safe Harbor Statement

The following is intended to outline our general product direction. It is intended for information purposes only, and may not be incorporated into any contract. It is not a commitment to deliver any material, code, or functionality, and should not be relied upon in making purchasing decisions. The development, release, and timing of any features or functionality described for eprentise's products remains at the sole discretion of eprentise.

About eprentise

❑ Origin

- Founded by industry veteran Helene Abrams who was Oracle's first Applications consultant

❑ Who we are

- Product company supporting Oracle E-Business Suite customers' needs for financial and operational change
- Oracle Gold Partner since 2007
- Patent for Consolidation Methodology, 2012

❑ Our current target markets

- Large global corporate organizations
- Cross-industry

❑ Our current product lines

- Four business transformation software product lines:
 - Consolidation merges and harmonizes one or more disparate, differently-configured, database instances into a single, fully-functional application
 - Divestiture filters data when a company is carving out or selling off part of their business, to create a stand-alone fully functional environment for the divested entity with a limited data set
 - FlexField changes the financial chart of accounts to support standardization and increase reporting reliability retaining all transactional history
 - Reorganization changes or moves any configurations or set-ups and all related transactions. Reorganization is a broad category and includes software solutions for merging or separating organization units, ledgers, inventory organizations, or legal entities, calendar changes, currency changes, etc. Reorganization Software is used to comply with new regulatory or statutory changes, new organization structures, entry into new markets, and to support mergers, acquisitions, or divestitures.

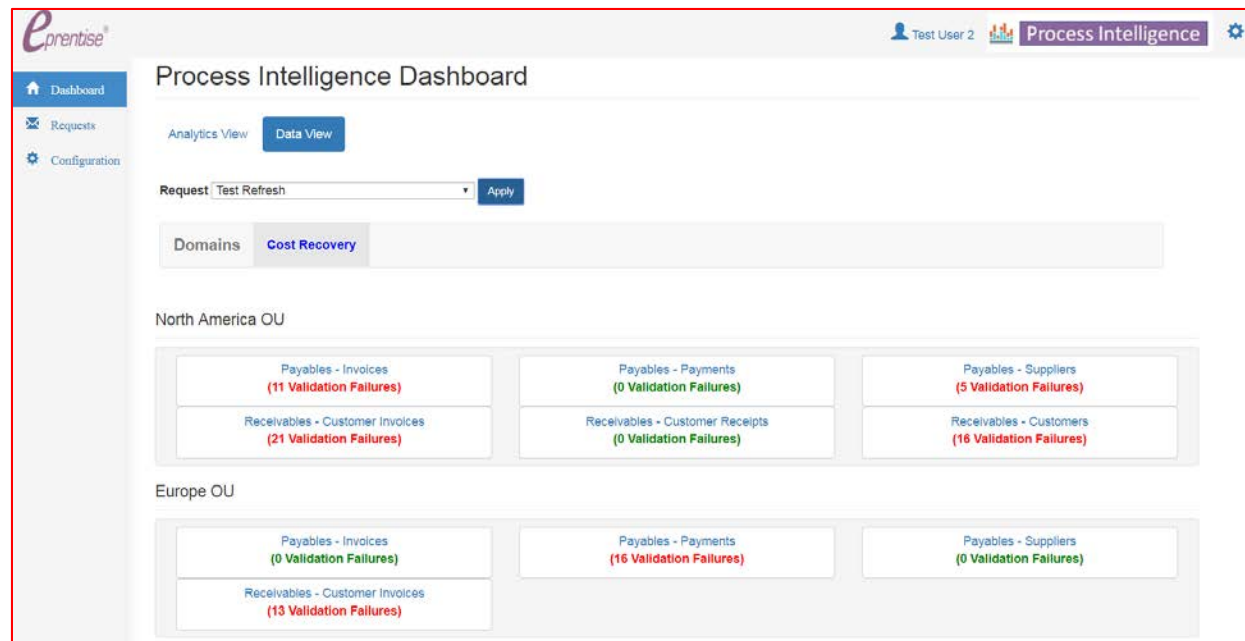
❑ New product lines

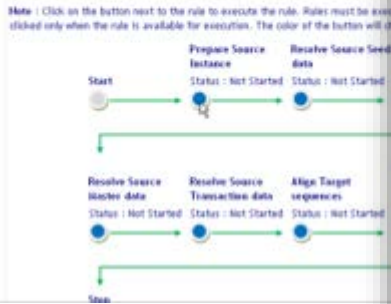
- Automated External Audit
- C Collection Analytics
- GDPR

❑ Does not violate Oracle Support Agreement

Other New Products: C Collection Analytics

- ❑ Cost Recovery
- ❑ Cash Management
- ❑ Data Quality (Complete, Consistent, Correct)
- ❑ Profit Improvement





Consolidation



Project Divestiture Project for ERP

- Divestiture
 - Rules
 - Create Rules**
 - Validate Rules
 - Confirm Rules
 - Execute Rules
 - Apply Changes
 - Reports
- User Tasks
 - Change Password
 - Change Activity
 - Global Dashboard

Create Rule

Rule Type	Filter Rule		
Rule Template	Filter by Legal Entity Organization		
Authority Type	Instance	Enable	☒
Authority	ERP-51-UNEN	Allow others to Modify/Delete/Execute	☐
Rule Name	Filter By Legal Entity	Exclude	☐

Selection Criteria

Legal Entity	ABC Company Limited
Balancing Segment Value	01

Rules

Divestiture

Logged In As: BUSINESSUSER

Logout

Map Accounting Flexfield

Execute Change

Map COA

Map Segments

Map Values

Map Code Combinations

Map Segments

Map Values

Map Code Combinations

Execute Changes

Select New Accounting Flexfield

Vision New Netherlands COA

New Segments

Length	Seg #	Name	Type	Length	Constant Value
2	1	COMPANY	Alpha	2	
4	2	ACCOUNT	Alpha	4	
3	3	DEPARTMENT	Alpha	3	
3	4	PRODUCT	Alpha	3	

Mappings Have Been Defined:

New Accounting Flexfield	Delete?
Vision New Netherlands COA	☐

Save Mapping

Delete Mapping

Print

Reorganization

Logged In As: BUSINESSUSER

Logout



Project: NA Bourgeois Inventory On

Reor

Logged in As: BUSINESSOWNER

[Create Rule](#)

Rule Type:
 Rule Template:
 Action/Type:
 Action/By: ☐
 Rule Name:

Selecting Criteria
 mapping File:

	A	B	C
1	INVENTORY_ORG	CURRENT_OPERATING_UNIT	NEW_OPERATING_UNIT
2	Vision Operations	Vision Operations	
3	Seattle Manufacturing	Vision Operations	
4			

eprantise®

Reorganization

Project: RA Reorganization

Logged in As: REID0000000000

Logout

- Reorganizations
 - Rules
 - Create Rules
 - Validation Rules
 - Cascade Rules
 - Rename Rules
 - Apply Changes
 - Reports
 - New Tools

Create Rule

Rule Type: Merge Rule

Rule Template: Merge Operating Units

Authority Type: none

Authority: no text

Rule Name: Merge Operating Units Text

Enable: ☐ allow others to modify later/execute

Selection Criteria

Merge Operating Units: Progress Canada

Source: Progress Canada

Target: Progress MB

Save Cancel

Rules

Rule Name	Owner	Date Created	Action
No rules are available.			

The screenshot shows the 'Create Rule' dialog box in SAP. The 'Rule Type' is 'Change Rule'. The 'Rule Template' is 'Change Set of Book Containing'. The 'Authority' is 'No Authority'. The 'Rule Name' is 'Ting Ho - SUB-CRM-CA0000'. The 'Selection Criteria' section shows 'Set of Books Name' as 'No. Set of Books', 'Current Company Code' as '040', 'New Company Code' as '000', 'Rule Conversion Type' as 'Complete', and 'Loading Balances' as 'No. Loading Balances'. The 'Log On' button is highlighted.

Project Merge SOB BGCB-62 into BGNA-1

Logged In As: BARRICK_1

[Create Rule](#)

Rule Type:

 Rule Template:

 Authority Type: Enable

 Authority: Allow others to

 Rule Name:

Selection Criteria

Source Set of Books	Target Set of Books
Barrick Gold Corp - Barbados	Barrick Gold of North America



Reorganization

Project: Add MDZ Policy to Barwick Gold 12 Calendar

Logged In As: BARWICK_001

Logout

- Reorganizations
- Roller
 - Create Policy
 - Transfer Rules
 - Change Rules
 - Remove Rules
 - Apply Changes
 - Reports
 - Use Tools

Create Rule

Rule Type:

Rule Template:

Adjuster Type:

Adjust By:

Rule Name:

Available

Allow HTML to Modify Rules

OK

Click on Calendar ID

Selection Criteria

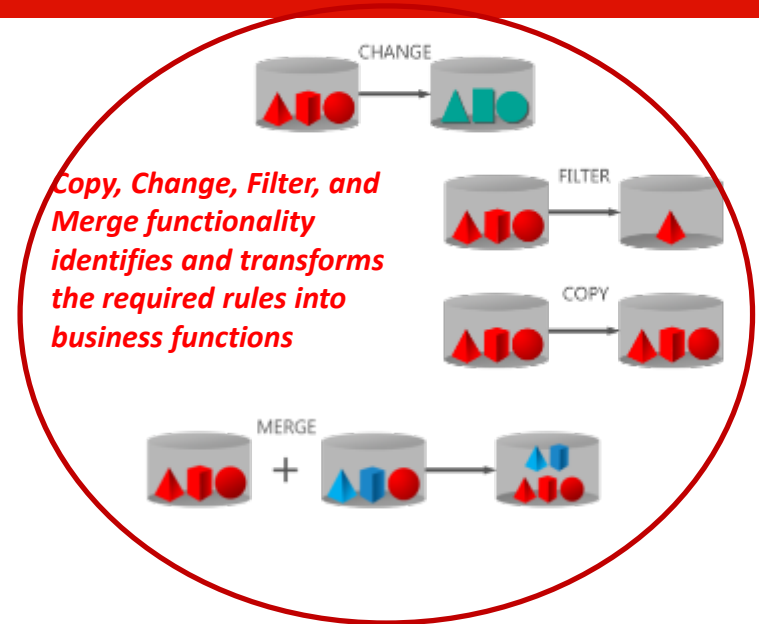
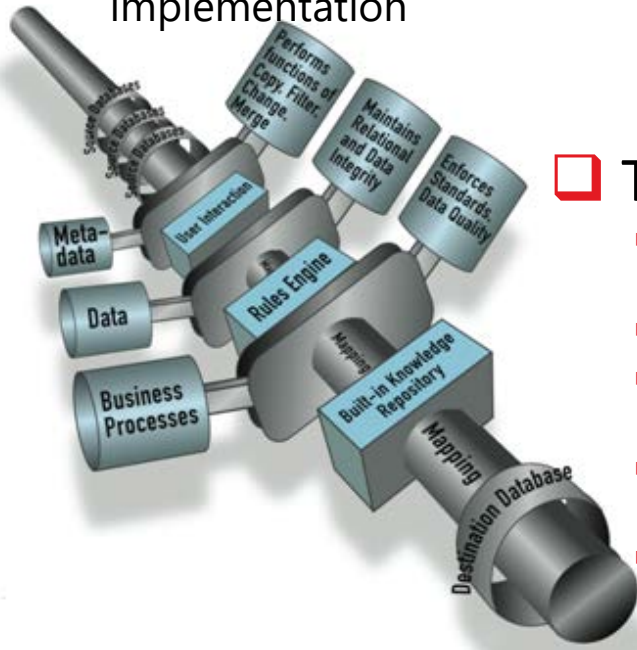
See Calendar ID

IF (GLD 000-07-Aug-2009) [Yes/No] [Cancel] [Browse]

eprentise Transformation Solution

Metadata Analysis

- Knowledge Repository – intelligent, learning and building from each successive implementation
 - Houses hundreds of thousands of rules
- Rules Engine
- Automated conflict resolution and data mapping
 - Rules learned automatically during each implementation



Transformation Engine

- Metadata transformation specific to product (documented & undocumented)
- Knowledge acquired from product and process
- Converts all historical data in every module with 100% accuracy.
- Process Automation to transform data from source to target
- Executes rules in the right sequence to maintain relational integrity

Ultimately Generates the Single Source of Truth for the Customer

Who Does GDPR Affect?

- ❑ One of many laws currently geared towards the overarching objective of data protection in the European Union (EU) to provide citizens with control over their personal data
 - Relates to **individuals in the EU**. (It does not apply to data about **companies** or other **legal entities**)
 - Does **not** apply to personal data of deceased persons or legal entities that are no longer in existence
 - Applies only in the context when personal data is being used for socio-cultural or financial activities. Anyone hosting such data will be subject to strict requirements
- ❑ Consequences of noncompliance include significant financial penalties
- ❑ Applies to a company if it processes personal data in the EU or if you are formed outside of the EU but offering goods/services to the EU, or monitor the behavior of individuals in the EU

Definition of Personal Data

- ❑ Any information that relates to an identified or identifiable living individual, as well as pieces of information that collectively could identify an individual:
 - Names
 - Home address
 - Emails (personal)
 - Identification card number
 - Location data (e.g., Location services on a phone)
 - IP address
 - Medical
 - Cookie ID
- ❑ Of the above examples, the following have been designated by the GDPR as “sensitive” personal data
 - Racial, ethnic origin, political opinions, religious or philosophical beliefs
 - Trade-union membership
 - Genetic data, biometric data
 - Health-related data
 - Data about one’s sexual life or sexual orientation

***There are additional requirements and levels of consent needed to process sensitive data
- ❑ Processors and Controllers of data are subject to the GDPR – entities who by either manual or automated means collect, record, organize, structure, store, adapt, alter, retrieve, consult, use or disclose by transmission, personal data
 - Payroll Administration
 - Contact Databases
 - Sending Promotional Emails
 - Shredding documents with personal data

Guiding Principles for Data Protection*

Principle	Explanation
Lawfulness	Data should be processed only when there is a lawful basis for such processing (eg, consent, contract, legal obligation)
Fairness	The organization processing the data should provide data subjects with sufficient information about the processing and the means to exercise their rights
Transparency	The information provided to data subjects should be in a concise and easy-to-understand format (eg, the purpose of consent should not be buried in a lengthy document of terms and conditions)
Purpose limitation	Personal data may be collected only for a specific, explicit, and legitimate purpose and should not be further processed
Data minimization	The processing of personal data should be adequate, relevant, and limited to what is necessary in relation to the purposes for which those data are used
Accuracy	Data should be accurate and kept up to date
Storage limitation	Data should not be held in a format that permits personal identification any longer than necessary
Security	Data should be processed in a manner that ensures security and protection against unlawful processing, accidental loss, damage, and destruction
Accountability	The data controller is responsible for demonstrating compliance

Source: Regulation (EU) 2016/679 of the Council of the European Union, European Commission, and European Parliament

[/www.mckinsey.com/business-functions/risk/our-insights/tackling-gdpr-compliance-before-time-runs-out](https://www.mckinsey.com/business-functions/risk/our-insights/tackling-gdpr-compliance-before-time-runs-out)

Accessibility of Personal Data

What We Got When We Asked Marketers for Our Data

Prashant, lives in the U.K.

- **200** rows of data containing details about my personal life.
- **343** rows of data on the consumer marketing segments I've been assigned.

Natasha, lives in the United States

- **1** row of data indicating I once read an article on Forbes.com.

When We Asked Amazon

Prashant, lives in the U.K.

- Order history.
- Credit card information.
- Prime subscription data addresses.
- Wish list items.
- Devices used to access Amazon services.

Natasha, lives in the U.S.

- Order history.

https://www.nytimes.com/interactive/2018/05/20/technology/what-data-companies-have-on-you.html?emc=edit_th_180521&nl=todaysheadlines&nliid=304942070521

Why is Finding GDPR Data Hard?

- ❑ UK vendor Silwood Technology has carried out some initial research on five popular ERP applications only researching on variations of Date of Birth, Social Security Number or Tax ID:
 - SAP : 90,000 tables, 900,000 fields, SSN appeared in more than 900 tables and Date of Birth in over 80.
 - JDE: 5,000 tables,, 140,000 fields, SSN appeared in more than 170 tables, Date of Birth in more than 210.
 - MS Dynamics: 7,000 tables,, 100,000 fields, SSN appeared in more than 150 tables, Date of Birth in approximately 10.
 - Siebel: 5,000 tables, 170,000 fields, SSN appeared in more than 14 tables, Date of Birth in more than 6.
 - Oracle E Business Suite: 22,000 tables, 570,000 fields, SSN appeared in 5 tables, Date of Birth in more than 40.

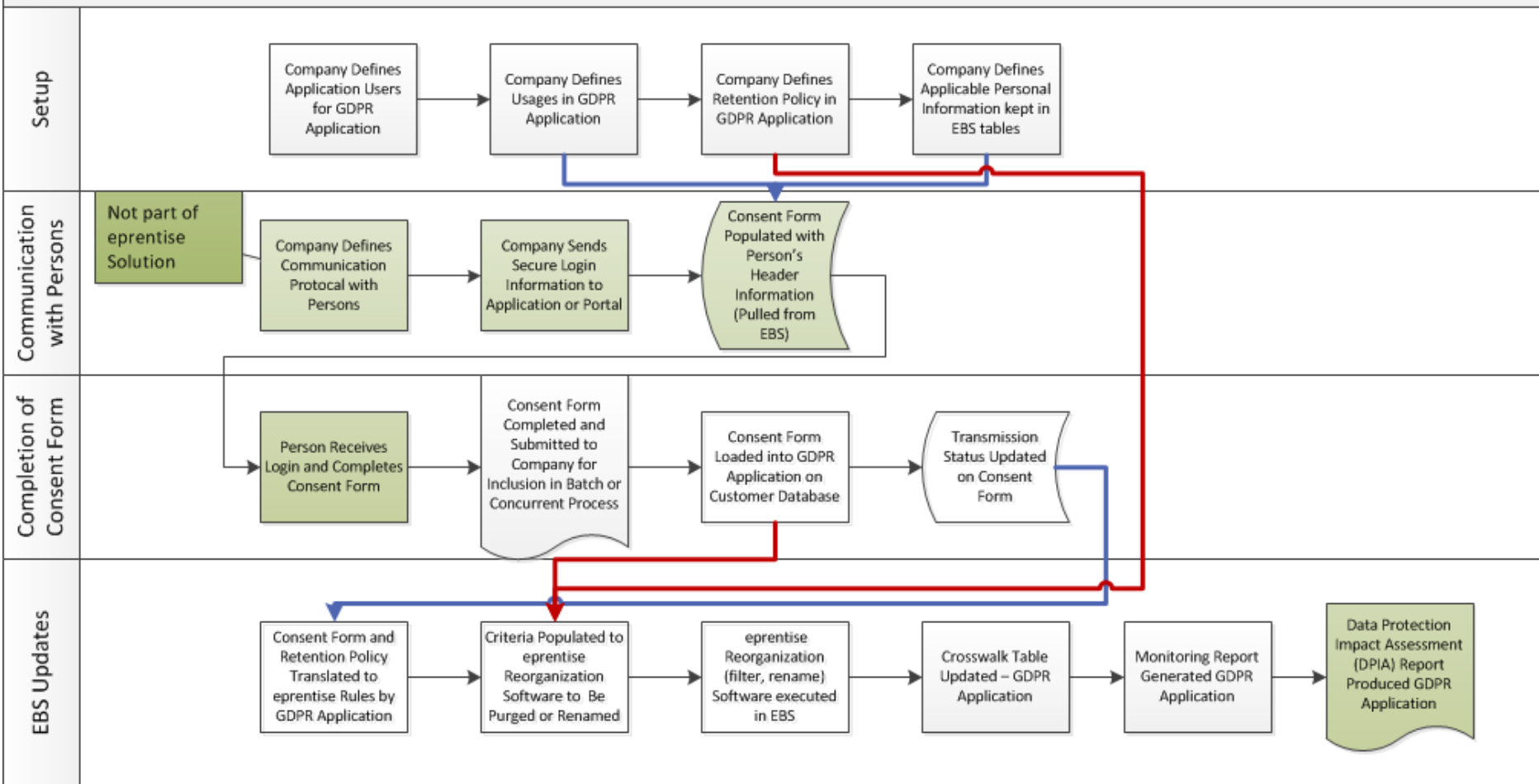
<https://www.enterprisetimes.co.uk/2018/02/20/gdpr-compliance-is-the-task-getting-bigger-for-enterprises/>

eprentise Solution

- ❑ Personal data be held only so long as needed for the purpose for which the data was collected
 - Personal data may be necessary for future use or reporting
 - Data, but not the identity of the individual, needs to be retained for future use or analysis
 - Personal data has no remaining use
 - Each type of use requires specific consent
- ❑ eprentise GDPR Application
 - Entering Retention Policy
 - Entering and Tracking Consent Form
 - Purging or Pseudonymization of Personal Data to Meet Retention or Identification Criteria
 - Reports to Monitor Activity
 - Maintenance of Crosswalk Table
 - Tight Integration with EBS Tables

eprintise GDPR Overview

GDPR Functionality



Legend

Not Part of eprintise Solution

Specifications – Usages and Consents

Define Usages Maintenance

Usage ID	Usage Name	Usage Description

Maintain Consents

Person ID		email Address	
First Name		Last Name	
Consent Form Date		Consent Form Update Date	
Transmit Date		Transmit Status	

Usage Name	Consent Effective Date	Consent Granted	Consent Denied	Consent Granted Until Date

Specifications - Policies

Company Data Retention Policy

Legal Entity Name	Location	Purge Person Data Before Date

Applicable Person Data

Person Attribute	Description	Classified as Sensitive Data	Requires Pseudonymization	Notes

Crosswalk Report

- ❑ Required for restoration for legal/tax reasons
- ❑ Must be encrypted
- ❑ No personal information stored
 - System-assigned person ID
 - Person attribute ID – table and column system-assigned number

Person ID	Person Attribute ID	Old Value	New Value

Filter on any Criteria and on Multiple Criteria

Retention Policy – Purge by Period

Project: Divestiture Project Logged In As: BUSINESS_USER [Logout](#)

- Divestiture
 - Rules
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 - User Tasks

Create Rule

Rule Type: Filter Rule

Rule Template: GDPR Purge Criteria

Authority Type: Instance Enable

Authority: Target_Instance

Rule Name: GDPR_Purge_Rule

Selection Criteria

Purge Prior to Period: JAN-2011

Select Entity: --Select One--

Load File: Upload

Filter by Person, Customer, Employee, Supplier, etc.

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Authority: Target_Instance

Rule Name: GDPR_Purge_Rule

Selection Criteria

Purge Prior to Period: JAN-2011

Select Entity: --Select One--

Load File: No file chosen Upload

FileType	FileName	STATUS
Party	Party.csv	Successfully inserted 1 rows
Customer	Customer.csv	Successfully inserted 1 rows
Employee	Employee.csv	Successfully inserted 1 rows
Supplier	Supplier.csv	Successfully inserted 1 rows

Load Consent Form File



Managing the Risk

- ❑ Assign ownership of GDPR to a cross-functional task force
- ❑ Define the scope of your GDPR program, determine what needs to be ready first
- ❑ Determine data retention policies and develop usages and consent forms and policies for pseudonymization
- ❑ Identify processes for keeping the inventory of personal data current
- ❑ Use GDPR as a starting point to build records of every personal-data processing activity
- ❑ Define data collection policies and determine processes for monitoring and restoring personal data

Benefits of the eprentise Solution

- ❑ Proven technology
 - Filter criteria used in divestitures to purge data
 - Renaming technology used in consolidation and merges to resolve conflicts
- ❑ Software solution not migration or integration
- ❑ Full lifecycle from consent to data removal for complete GDPR compliance
- ❑ Data is purged, not kept in an archive that could be compromised
- ❑ Rules-based software retains relational and data integrity
- ❑ Database rules understand all relationships in Oracle E-Business Suite so all related personal data is either purged or renamed
- ❑ Crosswalk table maintains confidentiality by not containing any personally identifiable data itself
- ❑ Reduced risk

Prices

❑ Implementation and Training

- Generally 5 days (remote)
- Custom Tables having PD
 - Relationships identified by Customer

❑ License Fees for eprentise

- Monthly Subscription Fee
- Per user fee based on 0.5% of EBS users
 - Minimum 5 users
 - (i.e. 1000 EBS users = 5 GDPR users)

❑ Product Support Fee

- Monthly Subscription Fee

Thank You!



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- One World, One System, A Single Source of Truth -

For questions, you can also share them on EBS Answers:
<http://www.linkedin.com/groups/EBS-Answers-4683349/about>