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System changes for GDPR – Visitor data

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Agenda

- What is GDPR?
- 12 steps to preparing for GDPR
- NVG systems impacted by GDPR
- Operational visitor data
- eMarketing visitor data
- Your next steps

What is GDPR?

- General Data Protection Regulation (GDPR) extends current Data Protection Act (DPA) and applies to the personal data you control (e.g. names, addresses, telephone numbers, email addresses etc.).
- GDPR will come into force on 25 May 2018 and is a legal requirement.
- Under GDPR you are the **Data Controller** and are responsible.
- NVG are the **Data Processor** and are making basic changes to the system to allow Data Controllers using our systems to be compliant.
- NVG are not GDPR experts and you should not rely on anything in this presentation for your GDPR compliance.
- We are updating a web page summarising the system changes (www.nvg.net/gdpr.aspx) and will be announcing these in the monthly newsletter and system news.
- This webinar explains changes for visitor data; we plan another webinar in the New Year on trade data.
- We are not charging for the basic system changes but if you require any additional changes or data updates then these will be chargeable.

12 steps to preparing for GDPR

- ICO have provided a useful document with [12 steps for preparing for GDPR](#)
- Four steps are directly relevant to NVG systems:
 - Point 3 - Communicating privacy information
 - Point 5 - Subject Access Requests (SAR)
 - Point 7 - Consent
 - Point 9 - Data Breaches

Point 3 – Communicating privacy information

- Under GDPR there are some extra things that need to be in your Privacy Policy, including data retention periods.
- We will be updating the default Privacy Policy to include the extra information required for GDPR.
- You will need to add extra information using DC.net > publishing > publication configuration > configure publication

Point 5 – Subject Access Requests

- You now have a month to respond to SARs
- We will be looking at SARs in the New Year but we are already working to make sure you can access all information that you store in our systems about an individual
- We will also be looking at the right to erasure

Point 7 - Consent

- Consent refers to how an individual gives you permission to contact them (traditionally through the data protection question)
- You don't need consent to contact someone as part of an actual or potential contract
- Key changes which affect NVG systems:
 - You cannot assume consent
 - You need to record how and when consent was obtained
 - You need to be specific if content applies to other organisations
 - You need to allow people to easily withdraw their consent
- This is the area that we have been concentrating on

Point 9 – Data Breaches

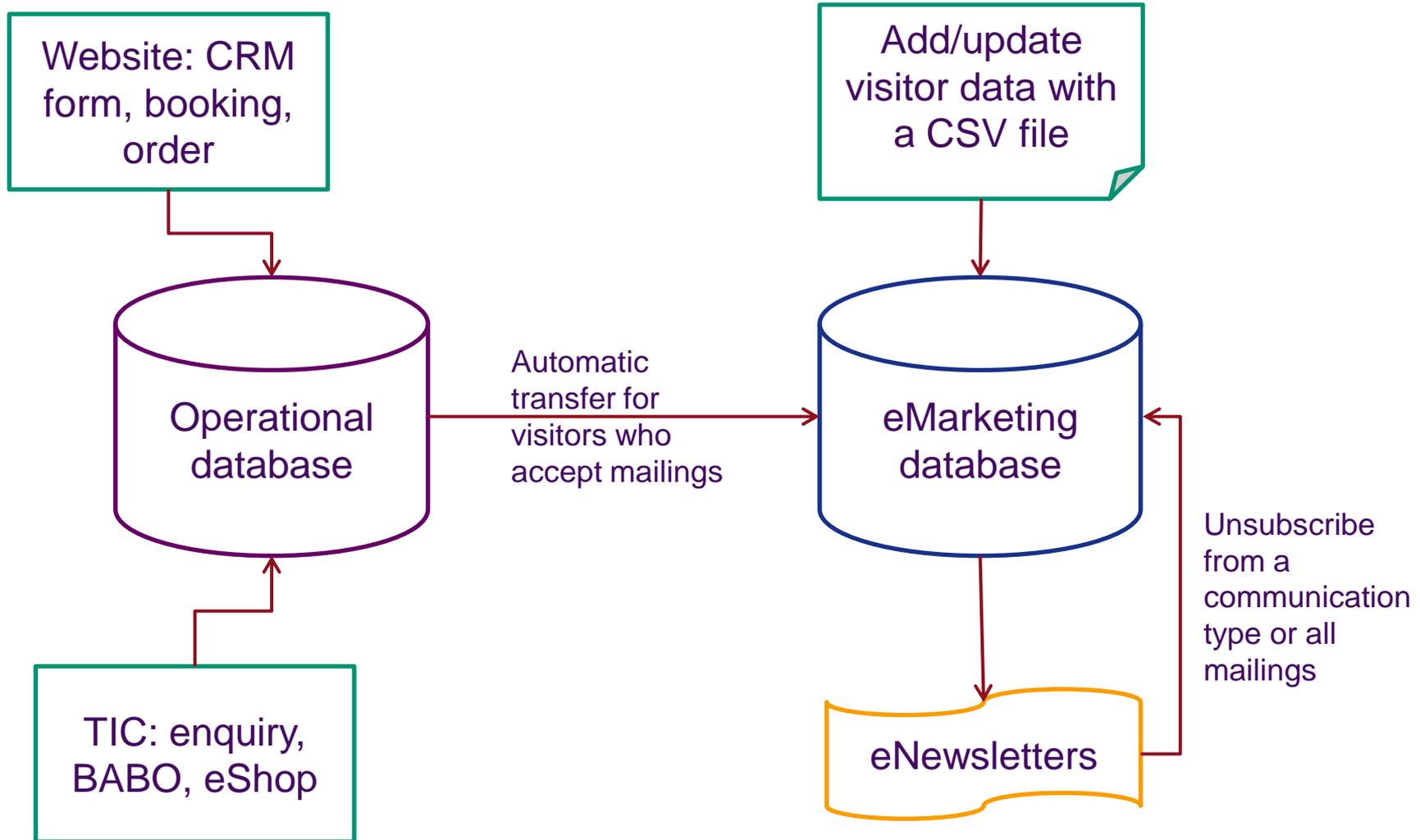
- As a Data Processor, NVG has some legal responsibilities for the security of your data held in our system and have the right procedures in place to detect, report and investigate a personal data breach.
- When we implemented PCI DSS we spent a lot of time or money on improving our security but we will be looking at this area in more detail in the New Year.

NVG Systems impacted by GDPR



- Whereas we believed that the DPA only applied to visitor data, we now believe that GDPR applies to both visitor and some trade data. Work on systems has been divided into 4 phases:
- **Phase 1 – (implementation by December 2017)**
 - Operational Database (e.g. booking and enquiry data)
 - New Data Protection tool live
 - Customer Reviews (e.g. reviews by customers for Guestlink bookings)
- **Phase 2 – (implementation by early January 2018)**
 - Marketing Database (e.g. marketing newsletters)
 - Privacy Policy contact details tool release
- **Phase 3 - (implementation by early February 2018)**
 - New Data Protection questions in use
 - New Privacy Policy in use
- **Phase 4 - (implementation by March 2018)**
 - Trade Data (e.g. accommodation and non-accommodation details)
 - Subject Access Requests (SARs)
 - Delete operational data that is unused for more than 18 months
 - Delete eMarketing data that is unused for more than 24 months
 - Data security review for GDPR
- **Phase 5 - (implementation by April 2018)**
 - Guestlink + Diary Data
- **Phase 6 - (implementation by May 2018)**
 - Relationship Builder decommission
 - Delete eMarketing records with no Data Protection Question and Answer

Visitor data in NVG systems



Operational visitor data

- When a visitor makes a booking, order or submits an enquiry through the CRM form or TIC, the data goes into the operational database.
- You don't need consent to collect this data as the visitor is asking you for some service but this is the point at which you would collect consent so that you can market to them in the future.
- Normally you would collect consent using the Data Protection tool. We have developed a new version of the Data Protection tool
- The question and answer for consent needs to be stored – we have already done this and back loaded – this can be viewed and exported in VBOE.
- Data protection answers can be viewed and updated in MOE.
- Retention period – we will only be storing operational visitor data for 18 months after its last use. All archives with data older than this will be deleted in Phase 4.
- Relationship Builder email system will be discontinued in Phase 6, as we do not believe this is compliant.

Changes to Data Protection

- DC.net > marketing > customer profiling > NEW configure CRM data protection
- New tool available, you need to add any pages where you don't want to use the default
- Be careful that your new questions are GDPR compliant (e.g. you need to be specific if you want to include other organisations)
- The new data protection questions will be used from Phase 3

Guestlink Visitor Reviews

- Guestlink reviews system has been updated to only show initials and country of reviewers and to not allow this data to be edited
- Historical reviews have been updated
- This means there is no personal data stored in the Guestlink reviews system

eMarketing visitor data

- We are making some significant changes to eMarketing, these will be implemented in Phase 2.
- When a visitor wants no mailings, their record will be deleted from the eMarketing database.
- Records from the operational database will automatically update the eMarketing system.
- The latest data protection question and answer will be stored in eMarketing and will be viewable, can be searched, exported and imported.
- We will no longer have a data protection option of ourselves and others in eMarketing database
- Retention period - we will only be storing eMarketing visitor data for 24 months after its last use. All archives and data older than this will be deleted in Phase 4.
- Records with no data protection question/answer will be automatically deleted in Phase 6.
- The unsubscribe page as part of our email system will be updated to make it easier for visitors to completely opt out; if they do this, their entry will be deleted from the eMarketing database.

eMarketing – issues for you to consider

- Records for which you do not have consent
- Use of your eMarketing data by other organisations

Your next steps

- Phase 1:

Data Protection – update new tool.

- Phase 2 (see January eNewsletter):

Privacy Policy – if you use your own, check it and update now. If you use the standard one, update your details.

eMarketing – clean up your database.