

## How Watson Customer Experience Analytics Provides Support for GDPR Compliance

### Executive Summary

IBM is making several changes to **Watson Customer Experience Analytics (WCXA)** to help organizations comply with the European Union's new General Data Protection Regulation (GDPR), which goes into effect on May 25, 2018. Please note that this document does not provide legal advice nor does it provide procedural advice for overall enterprise GDPR compliance. As new information arises, we will continuously update this document to ensure accuracy. Please review the disclaimer and notice at the end of this document for further details.

IBM has released and is continuing to release several enhancements to Watson Customer Experience Analytics to facilitate clients responding to end-user requests about their personal data. IBM is enhancing the following:

- 1) Scripts for deleting end users' personal data.
- 2) User management to allow your organization to control who has access to an end user's personal data.
- 3) Event and attribute interface to allow WCXA users to define where personal data exists.
- 4) Logs to better track WCXA user activity.

IBM has also updated our WCXA Service Description to provide additional documentation and visibility describing how personal data is processed. Your privacy is important to IBM and maintaining your trust is paramount to us. Learn more about [IBM Online Privacy Statement](#).

Please check back with IBM regularly for details as we continuously release new features and make them generally available. Find specific capabilities we are launching on the following pages.

## New GDPR-driven WCXA Capabilities

### 1. Scripts to delete personal data to support Right to Erasure requests

This feature will delete end users' personal data from across WCXA database when WCXA clients open a support ticket for GDPR-related "erasure" requests. To submit a request, please contact our privacy help desk at [IBM Privacy](#)

- Behavioral Analytics (Tealeaf): Contact our privacy help desk at [IBM Privacy](#) for Right to Erasure requests
- Digital Analytics: Contact our privacy help desk at [IBM Privacy](#) for Right to Erasure requests. [Learn More](#)
- Journey Analytics: Contact our privacy help desk at [IBM Privacy](#) for Right to Erasure requests

### 2. Restricted User Role allows you to control who has access to personal data

This feature provides a new user role that restricts access to features/reports that contain personal data. For example, restricted users will not be able to view session replays or create/view workspaces or reports that contain personal data.

- Behavioral Analytics (Tealeaf): [Learn More](#)
- Digital Analytics: Open a [support ticket](#) to request users with restricted role.
- Journey Analytics: Open a [support ticket](#) to request users with restricted role.

### 3. Flag Events and Attributes that contain personal data that won't be accessible to Restricted Users

This feature allows a WCXA user to indicate when an event or attribute contains personal data. This information will then be used to determine which workspaces/reports will not be available to users with the Restricted user role.

- Behavioral Analytics (Tealeaf): [Learn More](#)
- Digital Analytics: [Learn More](#)
- Journey Analytics: Not Applicable

### 4. Logging of Rectification/Removal of personal data

This feature will expand the list of user activities currently captured in our log files to include additional activities like Data exports and File downloads. This will allow clients to understand when and by whom personal data was modified.

To access these log files, submit a support request to <https://www.ibm.com/mysupport>

- Behavioral (Tealeaf): Open a [support ticket](#) to request log files.
- Digital Analytics: Open a [support ticket](#) to request log files.

- Journey: Open a [support ticket](#) to request log files.

## Additional Updates: Service Description Changes

The [Watson Customer Experience Analytics Service Description](#) features updates articulating our offering's GDPR related support. The **Data Processing Addendum (DPA)** has been added to the IBM base agreement and a **DPA Exhibit Repository** contains updates that are offering-specific.

- The **DPA** provides detailed terms on the processing of personal data by IBM on behalf of our clients. Topics include the processing of data, technical and operational measures, data rights and requests, third party rights and confidentiality, audits, the return or deletion of client personal data, the use of subprocessors, transborder data processing, personal data breach protocol, and general assistance. [Learn More](#)
- The **DPA Exhibit Repository** is offering-specific and will include topics related to backup procedures, cloud service expiration processes, and disaster recovery procedures. [Learn More](#)

For existing clients, these new documents will be available as part of a client's contractual framework when updating their subscription to Watson Customer Experience Analytics. For new clients, these additional documents will be included in the initial process when subscribing to Watson Customer Experience Analytics.

## Summary

If you have any questions regarding the content in this document or related to the support for GDPR within the Watson Customer Experience Analytics product, please contact your Customer Support representative or your Account Manager.

## Disclaimer

Information regarding potential future products is intended to outline our general product direction and it should not be relied on in making a purchasing decision. The information mentioned regarding potential future products is not a commitment, promise, or legal obligation to deliver any material, code or functionality. Information about potential future products may not be incorporated into any contract.

The development, release, and timing of any future features or functionality described for our products represents IBM's current intent, is subject to change or withdrawal, represents goals and objectives and remains at our sole discretion.

Nothing contained in these materials is intended to, nor shall have the effect of, creating any warranties or representations from IBM or its suppliers or licensors, or altering the terms and conditions of the applicable license agreement governing the use of IBM products.

## Notice

Clients are responsible for ensuring their own compliance with various laws and regulations, including the European Union General Data Protection Regulation. Clients are solely responsible for obtaining advice of competent legal counsel as to the identification and interpretation of any relevant laws and regulations that may affect the clients' business and any actions the clients may need to take to comply with such laws and regulations. The products, services, and other capabilities described herein are not suitable for all client situations and may have restricted availability. IBM does not provide legal, accounting, or auditing advice or represent or warrant that its services or products will ensure that clients are in compliance with any law or regulation.

Learn more about IBM's own GDPR readiness journey and our GDPR capabilities and offerings here: <https://ibm.com/gdpr>