How Watson Campaign Automation is Prepared for GDPR Support

Executive Summary

IBM has implemented and continues to implement enhancements to **Watson Campaign Automation (WCA)** to assist organizations with the European Union's General Data Protection Regulation (GDPR), which went 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. Please see the disclaimer and notice at the end of this document.

IBM has released and is planning to release enhancements to Watson Campaign Automation to facilitate companies responding to end-customer requests about their personal data. There are new APIs to programmatically retrieve or remove the entirety of a customer's personal data. We are enhancing our interface to allow Watson Campaign Automation users to manually respond to GDPR requests. We have changed how the application archives and handles customer data.

Watson Campaign Automation leverages a continuous release process to rapidly support GDPR-related updates. This means updates will be rolled out as soon as they are available, bringing these capabilities to our clients as quickly as possible. Initial delivery began in February 2018.

IBM has also updated our Watson Campaign Automation Service Description to provide additional documentation and visibility for processing personal data.

Please check back with IBM regularly as details may change as we implement features and make them generally available.

IBM

Watson Campaign Automation Capabilities for GDPR Support

1. **API to support Right to Erasure requests**
   This API supports GDPR-related "erasure" requests and removes records from across the WCA database. As needed, the request will be shared with related IBM components including Universal Behavior Exchange (UBX), Mobile Customer Engagement (MCE), SMS, Universal Behaviors, and others. Those systems are being designed to remove relevant contact data. Documentation for the API is available. Documentation (subject to change) can be found in IBM developerWorks here:
   https://developer.ibm.com/customer-engagement/tutorials/performing-gdpr-right-erasure-wca-apis/
   Related to:
   - Right to Erasure
   - Notification of third party systems
   Status: Delivered

2. **API to support Right of Access requests**
   This API supports requests to provide WCA users the personal data that exists for their end customer. Data is retrieved from WCA and the requests will be shared with related modules such as UBX and others and that those products also will return relevant personal data. Documentation for the API is available. Documentation (subject to change) can be found in IBM developerWorks:
   https://developer.ibm.com/customer-engagement/tutorials/performing-gdpr-right-access-wca-apis/
   Related to:
   - Right of Access
   - Notification of third party systems
   Status: Delivered

3. **Ability within the WCA interface to manually initiate a data subject access request**
   Enhancements to the WCA user interface (UI) are being designed to allow for a WCA end user to initiate a request to either produce a contact's data or to erase a contact. These requests enacted via the UI will invoke the same process as the APIs above. (See items #1 and 2.)
   Related to:
   - Right of Access
   - Right to Erasure
   - Notification of third party systems
   Status: Delivered

4. **Ability within the WCA interface to indicate which customer profile field(s) will be used for data subject access lookups**
   This feature will help enable users to indicate and identify which database fields contain identifiers that will be used to locate contacts.

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Related to:
- Right of Access
- Right to Erasure

Status: Delivered

5. **Ability within the WCA interface to indicate that a relational table contains customer data**

    This feature will help enable users to identify which relational tables contain customer data, and thus will need to be either retrieved or purged of related data when a GDPR request is received.
    Related to:
    - Right of Access
    - Right to Erasure

    Status: Delivered

6. **Ability within the WCA interface to indicate what field(s) in a relational table will be used for data subject access lookups**

    This item was previously identified as part of item #5 above but has been isolated as its own potential feature. This feature would help users identify the fields in a relational table that contain identifiers used to locate contacts when the identifiers are stored in a relational table rather than a database. This will be implemented based on customer demand should the need arise to identify contacts in this manner.
    Related to:
    - Right of Access
    - Right to Erasure

    Status: TBD

7. **Limit on storage, including logs, archives, and system files that contain personal data**

    IBM has updated WCA to limit storage of personal data in system log files, system records, archives, or off-lined data. Additionally, off-lined or archived databases and mailings must now be downloaded within 30 days.
    Related to:
    - Right to Erasure

    Status: Delivered

8. **Enhancements to Double Opt-In functionality**

    The Double Opt-In functionality can be a useful method to help ensure contacts have provided unambiguous consent to receive communications such as email. As such, more companies may start to use a Double Opt-In process. Based on customer demand, enhancements will be designed and implemented to improve and support this functionality within WCA as needed.

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Related to:
- Purposeful Consent

Status: TBD

Additional Updates: Service Description Changes

The Watson Campaign Automation Service Description articulates our offering's GDPR related support. The **Data Processing Addendum (DPA)** is 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.
- The **DPA Exhibit Repository** is offering-specific and will include topics related to backup procedures, cloud service expiration processes, and disaster recovery procedures.

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

Summary

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

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