

GDPR & Social Login: How the new Regulation will affect the Registration Process?

- New Registration form
- The process of data validation

Xegraa



The new **General Data Protection Regulation (GDPR)** of the European Union, coming into effect on May 25, 2018, is an opportunity that will benefit all parties:

- **Companies**, because their clients and users' safe data management is a unique opportunity to develop and implement transparent processes of data requests.
- **Individuals**, because it enhances their control over the information they share with companies.

The process of **Social Login** provides the transparency required by individuals and the capacity to apply data-based business intelligence.

The compliance of companies with GDPR and their ability to deliver return on investment indeed depends on their choice of business partners and suppliers.

In Xeerpa we are ready to design and implement the new measures and strategies in compliance with GDPR, as well as to help our clients to leverage the correct and transparent usage of users' data.

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INTRODUCTION

It goes without saying that nowadays Internet data privacy is one of the major concerns for users. The implementation of the new **GDPR** regulation marks a major shift in the way companies manage their clients or website visitors' data. The new regulation aims to reinforce the control individuals have over the data they share with companies.

As any regulatory change, GDPR implies an effort for any business to adjust to the new requirements. According to PwC¹, 77% of US companies employing over 500 workers expect to invest at least one million dollars [9% place this number above 10 million] to comply with GDPR.

An investment of this magnitude requires some economic return. Fortunately, **GDPR** represents an opportunity to improve business by capturing and treating customer data in a more efficient way, aimed at offering goods and services that best fit their individual needs.

Social Login happens to be a key tool to achieve this: not only it helps companies to comply with **GDPR**, it also empowers brands to improve on the personalization so demanded by modern customers.



^{1 &}quot;Pulse Survey: US Companies ramping up General Data Protection Regulation" by PwC, 2016

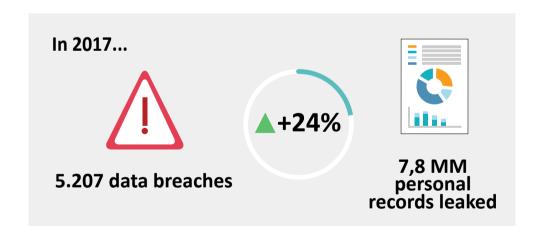


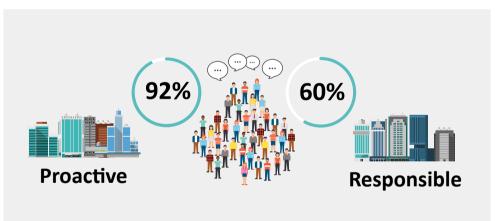
THE PERFECT STORM

GDPR emerges in the middle of the "perfect storm" of data privacy.

On the one hand, a constant increase of corporate data theft and its major impact on media. According to **Risk Based Security**², 2017 registered **5.207 data breaches**, that leaked over **7,8 billion of personal records**, a **24.2%** increase over 2016.

On the other hand, customers' concern is also increasing. According to PwC, 92% of consumers consider that companies should take proactive measures when it comes to data protection; and 60% claim that data protection responsibility lies with the company that collects them.

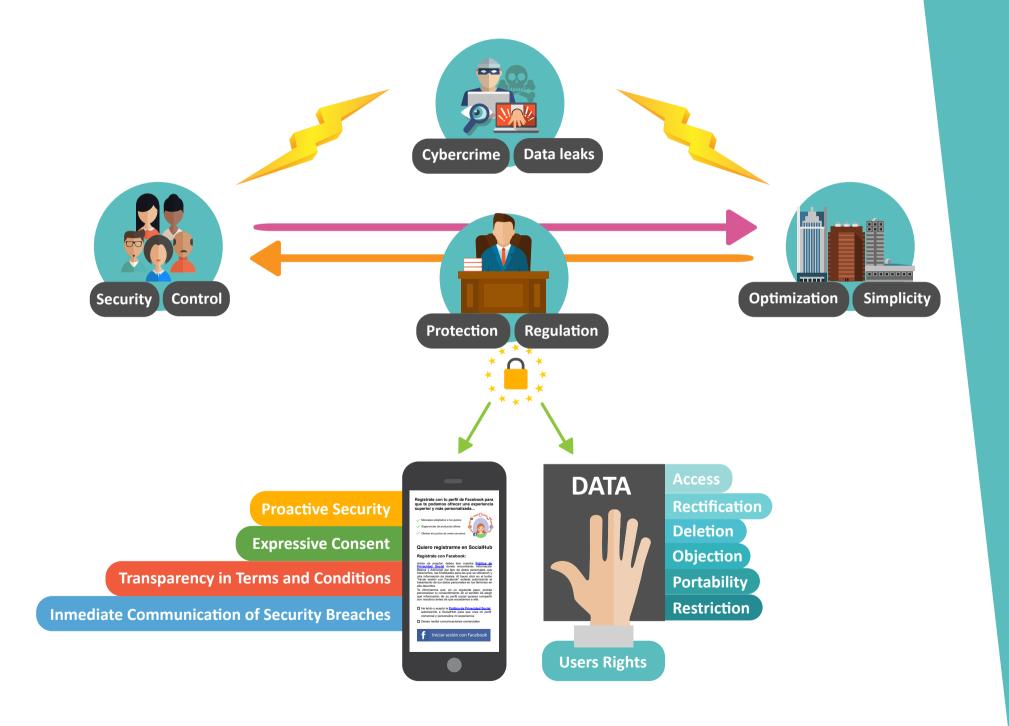




Lastly, the so-called phenomenon of "privacy fatigue", leading to emotional exhaustion and cynicism, has a major impact on the privacy behaviour than the proper concerns toward privacy issues.



THE NEW GDPR LANDSCAPE





KEY CHANGES AFFECTING REGISTRATION PROCESS AND DATA TREATMENT

Have you adjusted your process of registration and the Policy of Data Treatment?

Here we explain the main steps to follow in order to adjust your registration process both through Social Login and by filling in a Registration Form:

1 • Adjust the process of data collecting, storing and user consent management

- It is mandatory to ask users for an explicit consent to create a **business profile**, as well as to accept **Terms and Conditions** and, separately, opt-in to **receive commercial communications**.
- Clarity and purpose: new requirements to obtain the user consent prevent companies from applying "long and illegible" terms and conditions. The consent is expected to be "clear and easily recognisable", and must clearly indicate the purpose of colleting such data, i.e. how will it be used.
- The user consent confirmation should be stored adequately and must include metadata to prove the user did indeed consent.
- The acceptance checkboxes should be unchecked by default and the labels should be affirmative.



Respect users' rights, giving them an easy and accessible option to access, download, modify or delete their data



Right to access: The data subjects shall have the right to obtain from the controller a confirmation of whether their personal data is being processed, and the purpose of such processing. Besides, users have the right to request and obtain a free copy of their personal data, in a legible format.



Right to rectification: meaning users must have the facility, without undue delay, to rectify any inaccurate personal data, as well as to have incomplete personal data completed.



Right to deletion ('right to be forgotten'): the right to request erasure of personal data when it is no longer necessary for the purposes for which they were collected, or after withdrawing consent.



Right to objection: users may object to their personal data being processed for commercial or marketing purposes or, in certain cases, depending on their particular situation, unless the controller demonstrates compelling legitimate grounds for the processing which override interests, rights and freedoms of the data subject.



Right to data portability: when data processing is carried out by automated means and it is based on a consent or a contract, users have the right to receive the personal data provided by them or generated due to their activity, in a structured, commonly used and machine-readable format, and have the right to transmit said data to another controller.



Right to restriction of processing: means the non further processing of personal data that the subject had previously consented. This right is applied when the accuracy of the personal data is contested by the data subject, for a period of verification of the accuracy of this data. Also, processing will be restricted if the data subject has objected to processing pending the verification whether the legitimate grounds of the controller override those of the data subject. Finally, if you no longer need the data but the individual requests its maintenance, to be able to exercise a legal claim.

3. Data processing and security



Adjust the Policies of data processing to reflect a **conscious and proactive intent** to put into action **security measures** to prevent unauthorised access and minimize breach risks (check page 7 for examples of protocols and encryption systems used by Xeerpa).

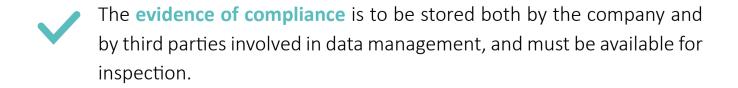






4. DPO and audit

Companies that manage personal data from users are to assign a Data Protection Officer and it is strongly recommended to carry out regular security audits.





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HOW DO WE DO IT?

In Xeerpa, we are responding to our clients' requirements, walking them through the GDPR compliance process. Focusing on compliance with social login and registration, we help them design personalized interfaces that align with the new legislation.

Xeerpa already has a designated Data Protection Officer

The Data Protection Officer in Xeerpa, who reports directly to the Board, supervises our processes related to Information Security and GDPR compliance, providing our clients with first hand advice.

Xeerpa offers flexibility and total control over your strategies for GDPR compliance

Xeerpa's API provides all the necessary functionalities to comply with directives and recommendations of the new GDPR without imposing any specific design constraints. This allows you to have absolute control over the visual user interface, aligned with your corporate identity and user experience.

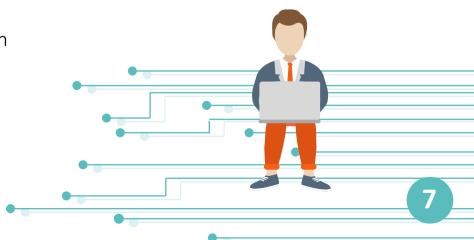
Xeerpa has already implemented rigorous technical security measures to ensure personal data privacy

The information is encrypted by LUKS and EFS systems and protected by password.

Data is accessed through SSL/TLS encryption protocol.

Data transfer is encrypted through AES-128.

Disks are formatted with DoD 5220.22-M algorithm, which consists in complete overwriting of the disks with random data to prevent its recovery.



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ISO 27001: DATA INTEGRITY, CONFIDENTIALITY, QUALITY AND AVAILABILITY

Xeerpa obtained the ISO 27001 certification, the international information security standard that proves **our systems are meeting the strictest security requirements**.

We comply with the three cornerstones of the ISO 27001 standard: we guarantee the physical and logical security of the information, its **confidentiality**, we make sure the information is **available** for all its validated and allowed recipients, and that it is exact and complete, guaranteeing its **integrity**.

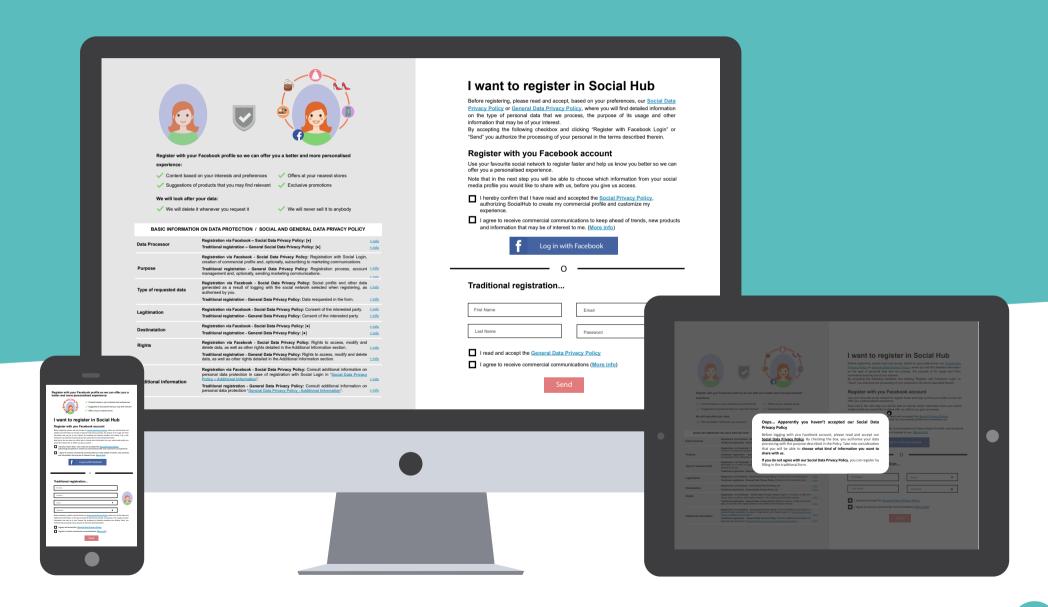
In order to obtain this certification, Xeerpa had to undergo rigorous internal and external audits, and we did it in our first attempt. Auditors reviewed over 100 points on different work processes on how we handle the information, from the existence and compliance with internal security policies, to how we manage our assets, security and cryptography used in our systems and communications, as well as our relationship with our suppliers and customers.



For additional information, please contact our CIO/DPO, Guillermo Cediel Blanco.

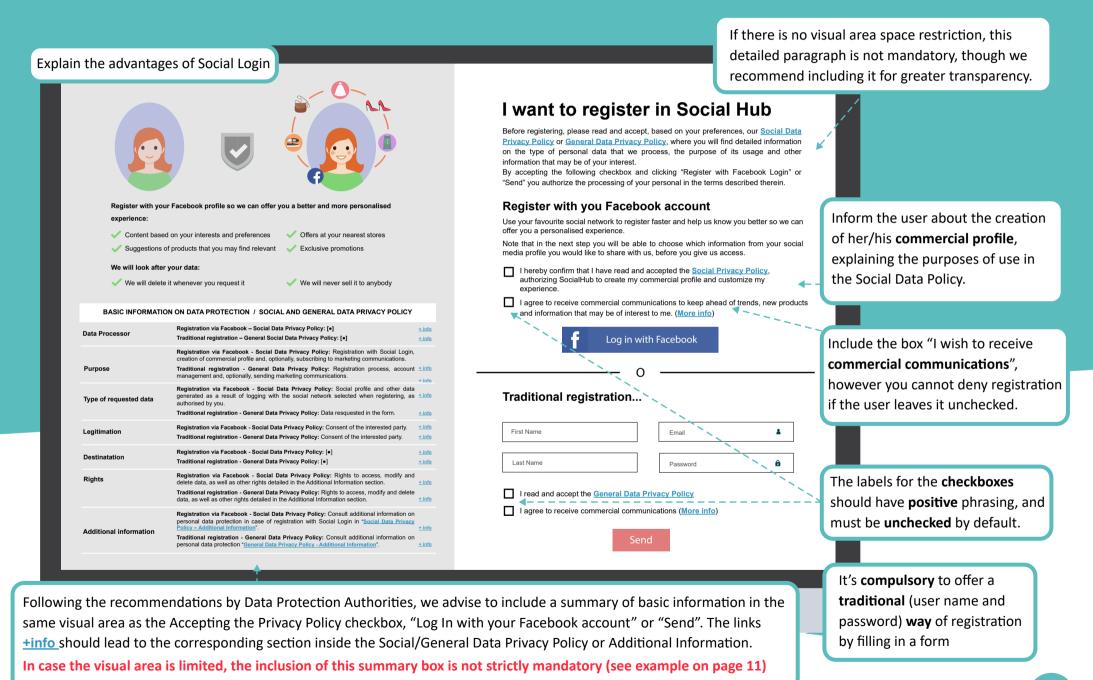


SOCIAL LOGIN AND THE REGISTRATION FORM: BEST PRACTICES





A. REGISTRATION AREA WHEN THERE IS NO SPACE LIMITATION



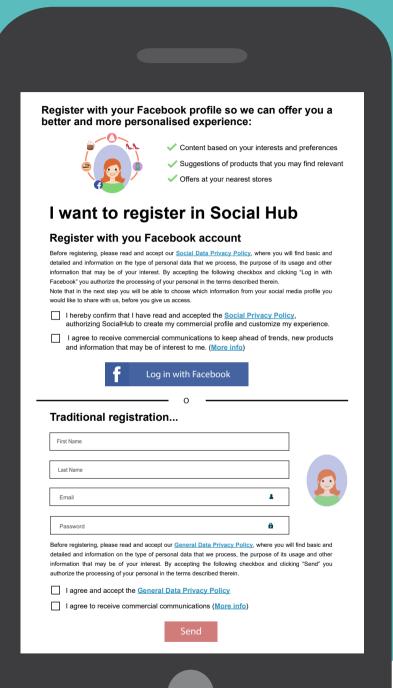


In both cases A and B, Xeerpa recommends the implementation of a double opt-in mechanism for the registration process.

Double opt-in is a

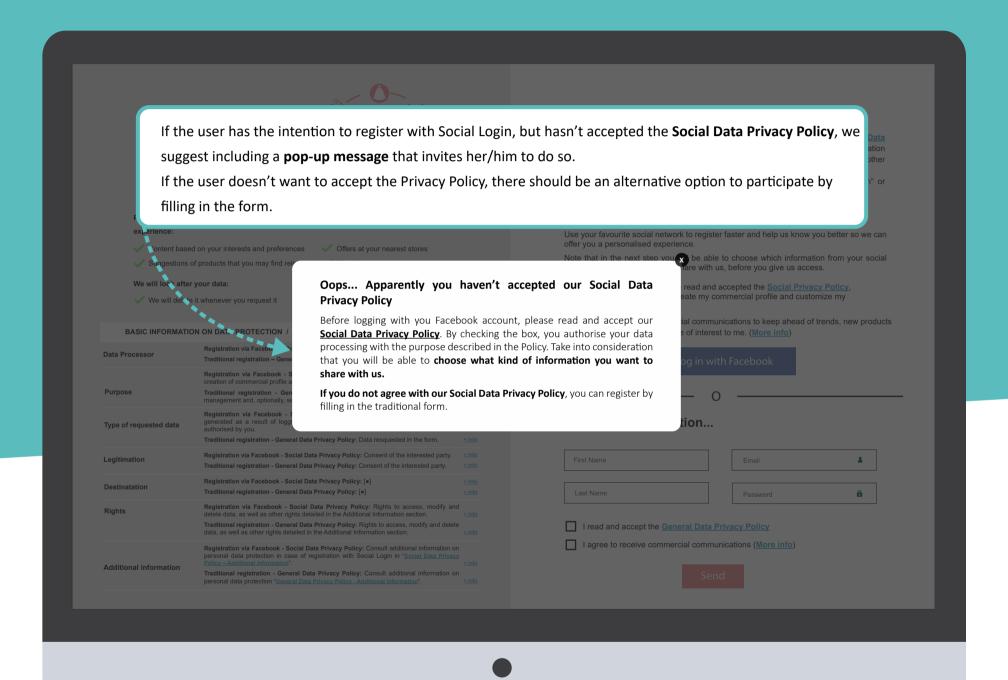
registration/subscription process that consists of 2 steps: accepting the Social Login terms and conditions, followed by requesting an additional consent verification, for example, by email or completing a form with consent checks.











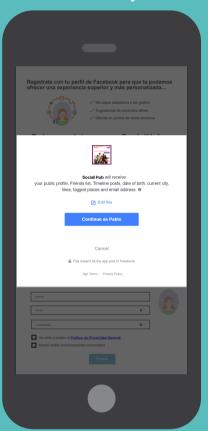


DATA VALIDATION PROCESS

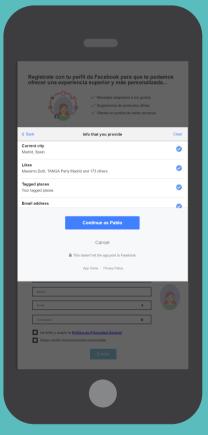




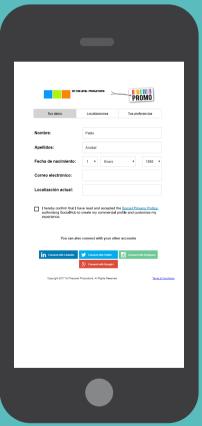
Registration Area



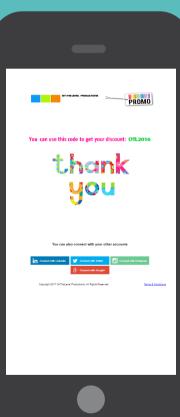
Confirmation of registration via Facebook



Selection of shared data



Data review and complementation



Thank you for your registration!

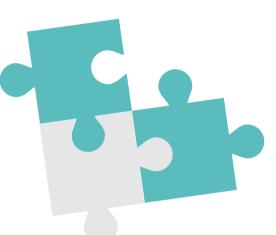


CONCLUSIONS

- 1. The new GDPR regulation is a legal framework that provides:
 - Enhanced transparency
 - Stronger control
 - Opportunities to create new business models and/or optimize the existing ones
- Companies smart enough to leverage GDPR, will increase intelligence around their users and adjust their Product and Service Offering to existing needs and expectations.



4. Social Login turns into a key element in the current scenario. However, it is crucial to optimize its usage, and not only for compliance reasons, but also to obtain the most useful information about the users.





GLOSSARY OF TERMS



Binding Corporate Rules (BCRs). A set of regulations created to allow companies and organizations that operate in various countries to transfer personal data from users from within the EU to their offices in other countries outside the EU.



Biometric data. Any piece of personal information that relates to the physical, behavioural or psicological characteristics of an individual, that allow her/his personal identification.



Consent. When an individual is previously informed and then freely, specifically and unequivocally, by a clear affirmative declaration of intent, confirms to agree with the processing of her/his personal data.



Data Controller. The legal entity that determines the purpose, objectives, conditions and means in which the personal data will be processed.



Data deletion and suppression. Implies that individuals have the right, upon request, to have their data removed from the database and stop any further processing even from third-parties.



Data portability. Requirement a user can make so that the Data Controller must facilitate her/him a copy of the personal data being held, in a format that is easily legible.



Data processor. Entity that processes personal data on behalf of the Data Controller.



Data Protection Authority. National authority in charge of protecting the data and privacy, as well as forcing the fulfilment of the data protection normative across the EU.





Data Protection Officer. Expert in data privacy that acts independently to ensure that a company complies all regulations and policies concerning GDPR.



Data treatment. Any operation or handling of personal data, including its obtaining, consulting, viewing, structuring, adapting, extracting, using, recording, etc.



Encrypted data. Personal data that is protected by encryption, so that it is only accesible and readable by a specific set of people that have been given explicit consent to access it.



Personal Data Breach. Accidental or intentional access, usage or deletion of personal data by violating the security measures protecting it.



Privacy by Design. Principle that must be followed so that data protection is conceived from the design stage of a system, process or treatment, as opposed to being taken into consideration afterwards.



Profiling. Any automated data processing of personal data with the purpose of evaluating, analysing or predicting the behaviour of an individual.



Pseudomization. Process by which personal data is treated so that it cannot be attributed to a certain individual.



Right to access. Implies that any individual must have the right to access the personal data that the Data Controller holds of her/him.



Subject. Person whose personal data is processed by a Data Controller.



APPENDIX I. SOCIAL DATA LEGAL TEXT*

This legal text is a suggestion and recommendation by Xeerpa, each client has to decide about its particular Privacy Policy.

Example of the legal text for "SOCIAL DATA PRIVACY POLICY ADDITIONAL INFORMATION ABOUT DATA PROTECTION"

The Social Data Privacy Policy below regulates the treatment of the personal data solicited/obtained by $[\bullet]^*$ (herein, $[\bullet]$) as a result of your registration in our website using your social media profile.

In this policy you will find Important information about the treatment and processing of your personal data, as well as your rights related to it. If you are in doubt or need any clarification you can contact us as described below.

[•] reserves the right to modify this Social Data Privacy Policy at any time.

The data facilitated must be true, exact, complete and updated, being responsible of any damage, both direct or indirect, that could be caused by not fulfilling with this obligation.

Important notice: Should you not agree with the treatment or purpose to be given to the data, described in this Social Data Privacy Policy, please do not continue with the registration process using your social media profile and opt instead for filling in the registration form provided.

1. WHO IS RESPONSIBLE FOR THE TREATMENT GIVEN TO YOUR PERSONAL DATA?

Entity/VAT: [●]

Postal address: [●]

Email: [●]

Data Protection Officer (DPO) - Contact: [●]

2. WHAT WILL WE DO WITH YOUR DATA?

- a) Manage your registration: We will be using your personal data to complete the registration process, control user access and manage our relationship with you.
- b) Create your commercial profile: the personal data you decide to share with us will also be used to complement our database and create or improve your commercial profile, so we can better understand your preferences in order to design, plan and personalise our marketing and commercial actions.

We will not however make any automated decision based on your commercial profile.

c) Send marketing communications: If you expressly accept it in the registration process, your data will be used to send you personalised marketing communications, as explained below.

3. CAN WE SEND YOU MARKETING COMMUNICATIONS?

[•] would like to keep you informed of our products and services, by sending you informative, commercial and marketing communications by email or other electronic channels based on the personal data you have shared with us. This will enable us to improve your user experience with us and to send you more personalised messages based on your preferences.

By ticking the "I would like to receive marketing communications" checkbox you will be authorising the treatment of your personal data for this purpose.

You can revoke this consent at any time by simply sending us an email to [•], indicating in the subject "Exercising my GDPR rights — unsubscribe from Marketing Communications" and attaching a copy of your National ID, Passport or any other valid document proving your identity. Revoking this consent will not affect the other two purposes (Managing your registration and account and Creating your marketing profile).

4. WHAT TYPE OF DATA WILL WE OBTAIN AND HOW DO WE TREAT IT?

The data that [●] will obtain and process may belong to any of these categories:

- Information about your "Public profile": This information is required so we can identify who you are. It is the information you provided to the social network you are using to complete the registration process in our website: Your name, surname, gender, social network id, profile picture, age range, language and country.
- ullet Other information that you agreed to share with [ullet], such as other means of contact, photos, personal features, social circumstances, academic and/or professional data, etc.

^{*[●]:} To be completed by the company



APPENDIX I. SOCIAL LEGAL TEXT

- Data generated from your usage of the social network you agree to share with [●], such us Likes or Posts. In no case whatsoever the main purpose of the treatment of your information will be to intentionally identify ideologies, affiliations, religion, health, sexual orientation, racial or ethnic origin. Any treatment by [●] of such data as it could be included in your posts and comments will be purely incidental and unintentional. By accepting this Social Media Privacy Policy you expressly manifest your acknowledgement of this possibility and expressly consent this incidental treatment of your personal data. If you do not agree please do not continue the registration process with your social media profile; you can choose instead to register by filling in the form provided.
- Email: This information is required to complete the registration process.

During the registration process you will be able to select, within the different options we will be providing, precisely which personal data from your social media profile you explicitly consent to share with [●], before we have access to it.

Some of the fields indicated in the listing will be requested during the registration process and some others at its completion, in a separate form, in which you will also be able to edit and modify some of the details provided. IMPORTANT: The additional information presented in this document also applies to the collection and treatment of these extended personal data.

IMPORTANT: The additional information presented in this document also applies to the collection and treatment of these extended personal data. If you do not agree please do not continue the registration process with your social media profile; you can choose instead to register by filling in the form provided.

5. WHO WILL BE SHARE YOUR DATA WITH?

[•]

6. ¿CUÁL ES LA LEGITIMACIÓN PARA EL TRATAMIENTO DE TUS DATOS?

The consent to process your personal data that we request from you in this registration process is the legal base that legitimates it.

7. HOW LONG WILL WE KEEP YOUR PERSONAL DATA FOR?

Your personal data will be kept for/until [●]

8. WHICH RIGHTS DO YOU HAVE WHEN SHARING YOUR DATA WITH US?

You have the following rights:

- Obtain confirmation regarding whether or not [•] is treating personal data that concerns you.
- Access to your personal data.
- Request rectification of any inexact or incomplete information.
- Request the deletion of your personal data when, amongst other reasons, it is no longer necessary for the purposes it was collected.
- Request, under certain circumstances, the limitation in the treatment and processing of your data, in which case we will only keep the information required by law against any claim or third-party rights.
- Oppose to the treatment of your personal data with the purpose of receiving sales and marketing communications, including the creation of your commercial profile.
- Request, when treatment of the data is done by automated means, the portability of your data, which will be returned to you in an structured and easy to read manner, as well as requesting its transmission to another party responsible for its treatment, when this is technically possible.
- Revoke your consent in relation to one or more of the treatments given to the data, in which case we will cease treatment of your personal data for said purposes, without affecting the previous consent given to the treatment until its revocation.
- Make a claim at the corresponding Data Protection Authority (In Spain: AEPD https://sedeagpd.gob.es).

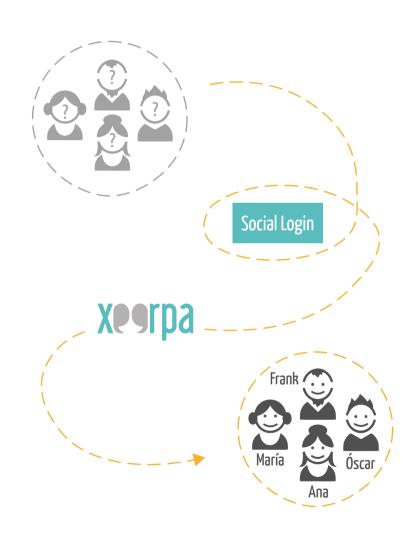
To exercise one or several of these data protection rights, send us an email to [●], indicating in the subject "Exercising my GDPR rights", specifying your request and attaching a copy of your National ID, Passport or any other valid document proving your identity.



APPENDIX II. THE BENEFITS OF SOCIAL LOGIN

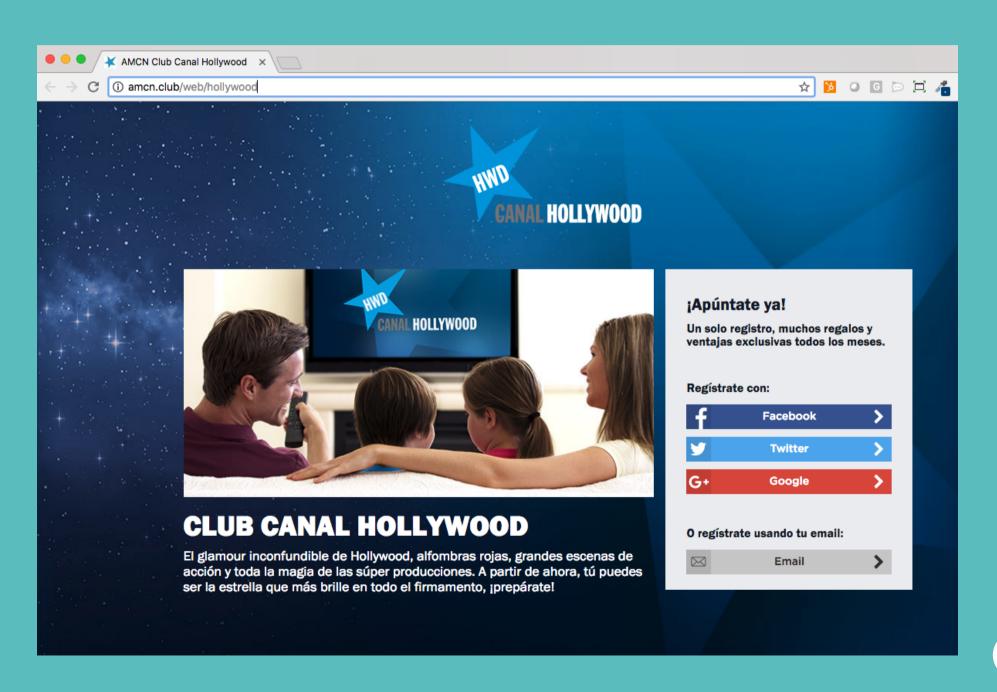
As mentioned before, under the new legislation **Social Login** is becoming a very useful tool, both for businesses and for consumers.

- For **brands**: On the one hand, **Social Login** allows the implementation of **GDPR-friendly** interfaces that comply with legal requirements without deteriorating UX. On the other hand, users' social data helps companies to implement data-based decision making and optimize their product offering to their clients' needs and interests.
- For **consumers**: **Social Login** reduces the **"privacy fatigue"**, simplifies the registration process and guarantees the right to access information at any moment, as well as reviewing the purpose of its storage and processing. Additionally, by sharing interests and preferences, users receive **less spam and irrelevant communications**, which results in less distraction and time optimization.



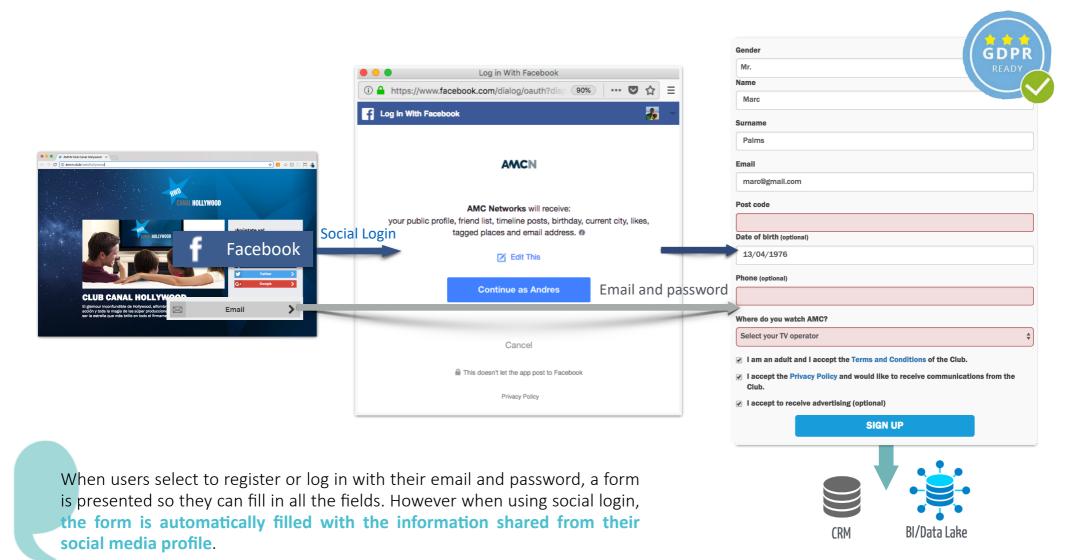


APPENDIX III. REGISTRATION AREA WITH SOCIAL LOGIN AND FORM EXAMPLE





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The form is always the last step in the registration process, and so it may include all **legal GDPR opt-ins** and, additionally, may request **additional data** that will allow the matching with the CRM. In this example the Postal code, Telephone number or a viewing question is asked additionally.

- Additional information can be requested to match with your CRM
- Informed consent
- ☑ All GDPR opt-ins available
- ☑ Easier for users: auto-filled forms, no more passwords





+34913759628



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