Sitecore Experience Cloud™ and GDPR

A high-level overview of how Sitecore Experience Cloud™ 9.x supports GDPR compliance

GDPR: How’s your compliance game?

By this point you know about the European Union’s (EU) General Data Protection Regulation (GDPR). You might even be sick of hearing about it. Every business impacted by GDPR has had a long compliance journey. According to a recent study, 22% of businesses will still be working on their compliance efforts in 2019. And even for the 78% of businesses that believe they have taken all required actions under the GDPR, it’s still a good idea to evaluate their compliance plan to ensure continuing compliance under GDPR obligations.¹ Getting compliant is a huge lift, but one worth doing given the cost of not—depending on the nature of infringement, fines can range between €10 million and €20 million, or between 2% and 4% of your worldwide annual revenue of the prior financial year, whichever is higher.²

This short brief provides a high-level overview of how Sitecore Experience Cloud 9.x can support your compliance efforts. But first, a necessary disclaimer: As a Sitecore® customer, only you can assess your own risks, and we recommend you seek legal counsel to understand the applicability of any law or regulation to your business, including how you process personal data.

² Article 83 of the GDPR which can be located here: https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679&from=EN

* The Sitecore Experience Cloud 9.x includes Sitecore Experience Platform 9.x and Sitecore Experience Commerce 9.x, both of which include the features outlined in this brief.
* ² Article 83 of the GDPR which can be located here: https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679&from=EN
In other words:

- This brief is not an alternative to any legal advice regarding any regulation or guideline.
- This brief is a high-level overview of how Sitecore Experience Cloud 9.x could help remediate noncompliance.

### GDPR: Data privacy rights and Sitecore Experience Cloud 9.x

The left side of the following table summarizes public information on how the GDPR prioritizes the data privacy rights of individuals. The right side summarizes the corresponding Sitecore features and solutions that can help you protect the personally identifiable information (PII) you choose to collect and process.

<table>
<thead>
<tr>
<th>Individual right</th>
<th>GDPR reference</th>
<th>Experience Cloud 9.x features</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>The right to be informed</strong></td>
<td>Article 12</td>
<td>Using the Sitecore® Experience Platform™ (XP), your desired web technology (such as HTML and JavaScript), and the Sitecore Content Editor, you can define and manage your privacy policies as content and present them to your end customers.</td>
</tr>
<tr>
<td></td>
<td>Article 13</td>
<td>Article 4 (11) of the GDPR defines &quot;consent&quot; as an affirmative action by the user. You can capture and store your end customer’s affirmative action in the Sitecore® Experience Database™ (xDB) as a facet on the end customer’s contact record. Once stored in xDB, you can display the contact’s information in the Sitecore® Experience Profile™.</td>
</tr>
<tr>
<td></td>
<td>Article 4 (11)</td>
<td></td>
</tr>
<tr>
<td><strong>The right of access</strong></td>
<td>Article 15</td>
<td>Sitecore xConnect™ provides an API, “GetContactAsync,” that allows you to retrieve a full contact profile for your end customer. With this API call, you can specify whether you wish to retrieve all known data about the contact. This includes their full profile and historical behavior.</td>
</tr>
<tr>
<td><strong>The right to rectification</strong></td>
<td>Article 16</td>
<td>You can build a preferences form, which displays and allows end customers to edit their profile, including personal data, making it easier for you to maintain accurate information in xDB.</td>
</tr>
<tr>
<td><strong>The right to erasure (aka, the right to be forgotten):</strong></td>
<td>Article 17</td>
<td>To support your response to your end customer’s erasure request, Sitecore provides the Sitecore xConnect feature “ExecuteRightToBeForgotten,” which irreversibly anonymizes the individual’s personal data, making it unidentifiable.</td>
</tr>
<tr>
<td><strong>The right to restrict processing</strong></td>
<td>Article 18</td>
<td>You can define the appropriate level of opt-in/opt-out required, based on the type of data you collect, and ensure your customers have control of and your application respects these settings. The Sitecore® Email Experience Manager (EXM) offers a global opt-out list setting; you can use it to disable all direct marketing activities to your end customer.</td>
</tr>
</tbody>
</table>
### Individual right | GDPR reference | Experience Cloud 9.x features
--- | --- | ---
**The right to data portability**
Individuals have a right to obtain and reuse their personal data for either their own use or for a different service. | Article 20 | Sitecore’s xConnect provides an API, “GetContactAsync”; you can use it to retrieve a full contact profile for your end customer. With this API call, you can choose to specify whether you wish to retrieve all known data about the contact, including their full profile and historical behavior. This profile, in a JSON format, can be provided to your end customer in whatever format you choose.

**The right to object**
Individuals have a right to object, at any time, to the processing of personal data concerning them. | Article 21 | This can be supported by defining the appropriate level of opt-in/opt-out required, based on the type of data you collect, and ensuring that your end customers have control of and your application respects these settings. Sitecore’s EXM offers a global opt-out list setting.

**Rights in relation to automated decision making and profiling**
Individuals have a right to not be subject to decisions made based upon automated processing, unless they provide explicit consent. | Article 22 | As an extensible platform, XP allows you to personalize experiences for your end customers, based on the information you choose to collect. Sitecore and industry best practices can recommend steps for being transparent in your privacy statements and consent language, and Sitecore products can help you track and store information, but data processing decisions will always be yours to make.

---

**Next steps**

We’d love to hear more about how your company has prepared for GDPR—there are lots of ways to get in touch. Besides giving your account manager a call, you can contact us by:

- **Email:** sitecore.net/contact-us
- **Phone:** sitecore.net/phone
- **Chat:** sitecore.net/chat
- **Request a demo** [here](https://www.sitecore.com/trust)
- **Read our commitment to privacy:** [https://www.sitecore.com/trust](https://www.sitecore.com/trust)