Right to erasure

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. Merative 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.

GDPR and the right to erasure

Article 17 of the GDPR states that a data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay. Article 5(1)(e) of the GDPR also states that data should be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.

Social Program Management (SPM) and the right to erasure

This document examines the means of performing deletion in Social Program Management to assist customers when addressing the GDPR requirement in relation to a data subject's right to erasure.

In order to know what data needs to be deleted from the database for a specified data subject, a model of the tables is required. The model that contains all of the relationships between the various tables in the database can assist with the deletion of only the data that has a direct relationship to the specified data subject. The data model needs to consider any entities that are installed by default and in use, as well as custom entities and relationships.

Not all relationships in the SPM database are specified by foreign key constraints. Therefore, it may be necessary to use external tools and resources to discover the relationships. Some relationships between entities in SPM are managed only in the application code and are not constrained in the database. If the application-managed relationships are known, they can

be used in addition to the modelled relationships from the database to provide a superset of relationships that can be used in the design and implementation of a deletion process.

Determining the scope of the deletion is at the discretion of the customer, but it should be determined carefully to avoid corruption of the application. For example, it may be necessary to identify any shared rows, where a row in a table may also be referenced from another location that will not be removed as part of the process. For example, where a case is being removed, some payments may be linked through deductions to the overpayment on another case. In these circumstances, a decision needs to be made about where the relationship will be broken when the record is removed, and if any additional information needs to be recorded to bridge the gap created by the removal of the record. The scope of the deletion can also be managed by analysing row counts across the database to exclude any unused tables. It is also recommended that administration and configuration tables be excluded from the deletion process.

Discovering relationships

The developer can make use of several tools and resources for discovering the relationships in an SPM database. Entity relationships can be sub divided into:

- **Modelled relationships** – these relationships are implemented by database foreign keys.
- **Application managed relationships** – these relationships are managed in application code either at the entity layer or above.

Modelled relationships can be discovered by using any of the following resources:

- The Cúram Analysis Documentation Tooling (CADT).
- Cúram Rational Software Architect Plugin.
- DBMS Client Software, for example, IBM Data Studio.

The following resources can be used to help identify instances of application managed entity relationships:

- The Javadoc for the external API
- Examination of the handcrafted SQL operations in the entity layer classes:
    - The handcrafted SQL operations are viewable in the Cúram Development Environment as described in the Entity handcrafted SQL operations topic in the Knowledge Center.
    - The entity handcrafted SQL operations are viewable through CADT on the Database SQL Operation pages. For example, the CADT page for the `Person` database table contains a link to the documentation page for the database operation `Person.readPersonAlternateName`. The documentation shows a coded relationship between the `Person` and `AlternateName` tables.

    - This method of finding instances of application managed relationships is recommended in scenarios where the relationships can be inferred from a single SQL query.
- Comparison of the database before and after executing use cases:
    - Run the server build target `extractdata` before executing a scenario. Store the generated DMX output.
    - Execute a business use case scenario in SPM.
    - Re-run the build target `extractdata` after executing the scenario.
    - Compare the DMX output to highlight related data that was generated during the scenario.
- Trace logging
    - Entity relationships can be inferred by running through a business use case in SPM and examining the resulting trace logging on the SPM server. This depends on the trace level that has been configured, and on application code making use of the tracing API.
    - For information about the pair of application properties that can be used to enable the trace logging, see the Logging level topic in the Knowledge Center.

Further Information

The GDPR text
http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679&from=EN

Cúram Analysis Documentation Tooling documentation

Cúram Server Developer Guide

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