



Merative™ Social Program Management

## Data minimisation and categorisation

**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.**

This document is intended to provide guidance to help you in your preparations for GDPR readiness. It provides information about features of this offering, and aspects of the product's capabilities, that may help your organisation with GDPR requirements. This information is not an exhaustive list, due to the many ways that clients can choose and configure features, and the large variety of ways that the product can be used in itself and with third-party applications and systems.

### The GDPR and data minimisation

The GDPR states that the controller shall implement appropriate technical and organisational measures for ensuring that, by default, only personal data that is necessary for each specific purpose of the processing are processed.

Article 5(1)c states that personal data shall be adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed.

### The GDPR and data categorisation

The GDPR states that processing of special categories of personal data is prohibited unless there is a lawful basis to do so.

Article 9(1) outlines these special categories of personal data of which examples are, but not limited to:

- Racial or ethnic origin
- Religious or philosophical beliefs
- Data concerning health
- Data concerning a person's sex life or sexual orientation

Article 9(2) outlines the lawful basis to process these special categories of personal data. Examples of which are:

- The data subject has given explicit consent to the processing of those personal data for one or more specified purposes.
- Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law.
- Processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent.

Article 10 states that processing of personal data relating to criminal convictions and offences or related security measures based on Article 6(1) shall be carried out only under the control of official authority or when the processing is authorised by Union or Member State law providing for appropriate safeguards for the rights and freedoms of data subjects.

## Social Program Management (SPM) and data minimisation & categorisation

### Personal data storage

SPM can store personal data in a variety of components, of which examples are:

- Dynamic evidence
  - Stored in the DynamicEvidenceData and DynamicEvidenceDataAttribute tables.
- Static evidence
  - Stored in a custom table for each static evidence type For example, SAMPLEINCOME evidence data is stored in the SampleIncome table.
- Datastore
  - Used by both IEG and the page player and is stored in the DatastoreEntity and DatastoreEntityRole tables.
- CER Determination blobs
  - Stored in the CreoleCaseDeterminationData and CreoleProgRecommendationData tables.
- Workflow instance data
  - Stored in the ProInstWDOData table.
- Task data
  - Stored in the Task table.
- ConcernRole data
  - Stored across a variety of tables including ConcernRole, ConcernRoleImage and ConcernRoleBankAccount.
- Freeform text
  - Cúram allows for freeform text to be entered in multiple locations. This text may contain personal data. For example, Notes and MeetingMinutes tables.

- Generated communications
  - Generated communications which are sent to users can be stored in the Attachment table.

### Examining the data flow

Customers can use the Cúram Analysis Documentation Tooling (CADT) tool to generate analysis documentation that is specific to a customer's application. The analysis documentation contains information about, but not limited to, application views and tabs, IEG scripts, rule sets, evidence, and database tables.

CADT can help perform a fit gap analysis on a default installation and help customers customise the application to their needs. This analysis documentation is one possible way to understand the flow of data and to help determine its purpose.

### Minimising the data

SPM can facilitate data collection in multiple ways, of which examples are, but not limited to, the following components:

- Common Intake
- Intelligent Evidence Gathering (IEG)
- Evidence
- UIMs with action phase facades
- Custom client widgets
- Web services
- External sources

Many instances of the above are provided in a default installation. These components can be customised to meet a customer's requirements.

Data may be processed in a variety of ways, for example, Eligibility and Entitlement which can use Cúram Express Rules, Decision Assist, Dynamic Evidence.

CADT can be used to analyse the data that is collected and determine if it is relevant and necessary for processing.

### Categorising data

It would be prudent for customers to categorise their users' personal data at its entry point into the system because it's the starting point of most business processes. Business processes can be analysed in conjunction with CADT to better understand the data that is collected.

## Further information

For more information about collecting data through an intake process, see the “Cúram Common Intake Guide”.

For more information about IEG, see the “Working with Intelligent Evidence Gathering” guide.

For more information about how IEG data becomes evidence, see the “Developing with the Data Mapping Engine” guide.

For more information about dynamic evidence, see the “Configuring Dynamic Evidence” guide.

For more information about Decision Assist, see the “Developing with Decision Assist” guide.

For more information about customising facades, see the “Cúram Server Developer” guide.

For more information about developing UIM pages, see the “Cúram Web Client Reference” guide.