

Collibra Platform
Data Privacy



Collibra Platform - Data Privacy

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You can find the most up-to-date technical documentation on our Documentation Center at https://productresources.collibra.com/docs/collibra/latest/#cshid=data-privacy

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Chapter 3

Installing	Data	Privacy
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This section contains information about first-time installations of Data Privacy.

Before starting the installation process, we strongly recommend that you create a full console export file for your Collibra Platform environment.

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Minimum requirements

Collibra Platform 2020.09

Prerequisites

- At a minimum, you have Collibra Platform 2020.09
- You have downloaded the CMA files from the Collibra Community Downloads page.
- The following are true of your Collibra Platform environment, with regard to Data Privacy out-of-the-box asset types and relation types:
 - The out-of-the-box hierarchy of parent/children asset types are maintained in your Collibra environment. The UUIDs of the out-of-the-box asset types are also maintained in your environment.
 - The out-of-the-box relation types (specifically, the combination of head asset types, roles, co-roles, and tail asset types) are maintained in your Collibra envir-

onment. The UUIDs of the out-of-the-box relation types are also maintained in your environment.

Warning We strongly advise that you not customize the Data Privacy operating model.

Installation files

Separate CMA files exist for CCPA and GDPR. If you have purchased both CCPA and GDPR, you need both CMA files. CMA files are available on the Downloads page.

Privacy integration with operating model

The following asset types, resource roles, and domain types related to Data Privacy are available out of the box in every Collibra environment. These are activated only for those who have purchased Data Privacy.

Tip

The Data Privacy Operating Model file is available on the Downloads page. This file contains the entire Data Privacy operating model, which includes the following:

- Data Privacy asset types added via the installation files. Examples: Contract, Remediation Plan, and Safeguard asset types.
- Changes made by the installation files to the out-of-the-box asset types in Collibra.

Examples: New characteristics added to Business Process, Data Category, and Data Set asset types.

In this topic

Asset types

The following Data Privacy asset types, including their dependencies such as characteristics, statuses, and roles, are part of the out-of-the-box operating model:

Chapter 3

- Data Subject Category
- Jurisdiction
- Legal Basis
- Party
- Vendor
- Processing Category
- Purpose
- Regulation
- Risk
- Control

The remaining Data Privacy asset types are deployed via the installation files.

Resource roles

The following Data Privacy resource roles are available out of the box:

- Business User
- Data Protection Officer
- Data Steward
- Privacy Steward

These resource roles are required to work with Data Privacy workflows, which are deployed via the installation files.

Show more information

The following table contains the attributes of the aforementioned resource roles.

Name	Description	ID	Permission	System
Business User	A user with responsibility over a domain, subject or process that is also user of the solution, application or tool.	c0e0000-0010- 0010-0000- 00000000002	['ASSET_ATTRIBUTE_ CHANGE', 'COMMENT_ REMOVE', 'RATING_ REMOVE', 'VIEW_ PERMISSIONS_ CHANGE', 'ASSET_ADD', 'COMMENT_ADD', 'ASSET_CHANGE', 'ASSET_CHANGE', 'RATING_CHANGE', 'ASSET_ATTRIBUTE_ ADD', 'ASSET_TAG_ CHANGE', 'ASSET_ STATUS_CHANGE', 'ASSET_ATTRIBUTE_ REMOVE', 'RATING_ ADD']	TRUE
Data Protection Officer	A Data Protection Officer (DPO) is an enterprise security leadership role required by the General Data Protection Regulation (GDPR). The DPO is responsible for overseeing data protection strategy and implementation to ensure compliance with GDPR requirements.	c0e0000-0000- 0000-0000- 00000005068	['DOMAIN_ RESPONSIBILITY_ADD', 'ATTACHMENT_ADD', 'COMMENT_ADD', 'DOMAIN_ RESPONSIBILITY_ CHANGE', 'COMMENT_ CHANGE', 'DOMAIN_ RESPONSIBILITY_ REMOVE', 'WORKFLOW_ MANAGE']	TRUE

Name	Description	ID	Permission	System
Data	A data steward is a	c0e00000-0010-	['ASSET_ATTRIBUTE_	TRUE
Steward	role within an	0010-0000-	CHANGE',	
	organization	000000000000	'ATTACHMENT_ADD',	
	responsible for		'COMMENT_REMOVE',	
	utilizing an		'RATING_REMOVE',	
	organization's data		'ASSET_TYPE_	
	governance		CHANGE', 'VIEW_	
	processes to ensure		SAMPLES',	
	fitness of data		'ATTACHMENT_	
	elements - both the		CHANGE', 'ASSET_ADD',	
	content and		'VALIDATION_	
	metadata. Data		EXECUTION',	
	stewards have a		'ATTACHMENT_	
	specialist role that		REMOVE', 'COMMENT_	
	incorporates		ADD', 'ASSET_CHANGE',	
	processes, policies,		'COMMENT_CHANGE',	
	guidelines and		'RATING_CHANGE',	
	responsibilities for		'ACCESS_DATA',	
	administering		'ASSET_ATTRIBUTE_	
	organizations' entire		ADD', 'ASSET_TAG_	
	data in compliance		CHANGE', 'ASSET_	
	with policy and/or		REMOVE', 'ASSET_	
	regulatory		STATUS_CHANGE',	
	obligations. A data		'ASSET_ATTRIBUTE_	
	steward may share		REMOVE', 'RATING_	
	some responsibilities		ADD', 'WORKFLOW_	
	with a data		MANAGE']	
	custodian.			

Name	Description	ID	Permission	System
Privacy	A privacy steward is	c0e00000-0010-	['ASSET_ATTRIBUTE_	TRUE
Steward	a role within an	0010-0000-	CHANGE',	
	organization	00000000001	'ATTACHMENT_ADD',	
	responsible for		'COMMENT_REMOVE',	
	utilizing an		'RATING_REMOVE',	
	organization's data		'ASSET_TYPE_	
	governance		CHANGE', 'VIEW_	
	processes to ensure		SAMPLES',	
	compliance. Privacy		'ATTACHMENT_	
	stewards have a		CHANGE', 'ASSET_ADD',	
	specialist role that		'VALIDATION_	
	incorporates		EXECUTION',	
	processes, policies,		'ATTACHMENT_	
	guidelines and		REMOVE', 'COMMENT_	
	responsibilities for		ADD', 'ASSET_CHANGE',	
	determining with		'COMMENT_CHANGE',	
	which policy and/or		'RATING_CHANGE',	
	regulatory privacy		'ACCESS_DATA',	
	obligations an		'ASSET_ATTRIBUTE_	
	organization should		ADD', 'ASSET_TAG_	
	comply.		CHANGE', 'ASSET_	
			REMOVE', 'ASSET_	
			STATUS_CHANGE',	
			'ASSET_ATTRIBUTE_	
			REMOVE', 'RATING_	
			ADD', 'WORKFLOW_	

Domain types

The following Data Privacy domain types are available out of the box.

Domain	Description
Process Register	A collection of business processes.
Remediation Register	An inventory of remediation plans and actions to remediate risks within an organization.

MANAGE']

Domain	Description
Risk and Control Register	A domain that contains assets of the following asset types: • Consequences • Control • Control Assurance • Risk • Risk Category • Risk Source

Threat

Install Data Privacy

This topic guides you through a first-time installation of Data Privacy.

Warning If you have purchased both CCPA and GDPR modules, you need to complete this procedure for one of the modules, and then complete it again for the other.

Prerequisites

You have downloaded the relevant product installation files from the Downloads page.

Steps

- 1. Create a full Console export file for your Collibra Platform environment.
- 2. Sign in to Collibra using an account with Sysadmin privileges.
- 3. On the main toolbar, click \rightarrow **Settings**.
 - » The Settings page opens.
- 4. In the tab pane, click **Migration** \rightarrow **Import**.
 - » The Migration Import page opens.
- 5. Upload the CMA file.
 - » Collibra validates the file and automatically downloads an import simulation report to your computer. It might take a few minutes to generate and download the report.
- 6. Select Please confirm that a current backup containing data and history was made, and then click Import.

- » Collibra imports the CMA file and automatically downloads an import report.
- 7. Click Done.

What's next?

- 1. We strongly recommend installing the out-of-the-box sample privacy and risk content.
- 2. If you have purchased both CCPA and GDPR modules:
 - a. Complete this procedure again for the module you haven't yet installed.
 - b. Install the out-of-the-box sample privacy and risk content for the module you haven't yet installed.
- 3. Edit the asset layout of the Privacy asset types to include the newly added attributes that are part of the CMA files.

Installation of out-of-the-box resources

During installation, the installer searches for all resources (for example, communities, domains, assets, relations, asset types, resource roles, and workflows) by UUID in the default location. If a particular resource is not found, it is created during the installation. If the newly created resource has the same name as an existing resource, the name of the existing resource is amended with the following suffix: **_migration_timestamp**.

Tip After installation is complete, we recommend searching for the word **migration** in Collibra to see which, if any, resources have been renamed, and to reconcile any conflicts that could arise due to the name change.

Import reporting

When you upload a CMA file for importing, Collibra Platform generates and automatically downloads an import simulation report in the Microsoft Excel format. This report contains sheets with the following pre-import information:

- Summary
- Processed resources
- Added resources
- Changed resources

- Added customization files
- Logs

When the CMA file is then imported, Collibra generates and automatically downloads an import report to confirm the actual changes made to your Collibra environment.

Install sample privacy and risk content

This procedure installs the out-of-the-box Sample content community and various related domains and assets.

Note This procedure is identical to the product installation procedure, with the exception that here you are uploading the sample content installation file. As is true for the product installation, there are separate sample content installation files for each regulation.

Prerequisites

- You have downloaded the relevant sample content installation files from the Downloads page.
- You have completed the product installation procedure.

Steps

- 1. Create a full Console export file for your Collibra Platform environment.
- 2. Sign in to Collibra using an account with Sysadmin privileges.
- 3. On the main toolbar, click \rightarrow Settings.
 - » The Settings page opens.
- 4. In the tab pane, click **Migration** \rightarrow **Import**.
 - » The Migration Import page opens.
- 5. Upload the CMA file.
 - » Collibra validates the file and automatically downloads an import simulation report to your computer. It might take a few minutes to generate and download the report.
- 6. Select Please confirm that a current backup containing data and history was made, and then click Import.

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- » Collibra imports the CMA file and automatically downloads an import report.
- 7. Click Done.

Upgrading Data Privacy

This section is relevant to those who are upgrading to Data Privacy 2022.01.

Note Only incremental upgrades are supported. This means, for example, that if you are using Data Privacy 2021.07 and you want to upgrade to 2022.01, you must first upgrade to 2021.10. Only from 2021.10 can you update to 2022.01.

Before starting the upgrade process, we strongly recommend creating a full backup of your Collibra Platform environment.

Warning

- We strongly advise that you not customize any of the out-of-the-box workflows. If you want to use an out-of-the-box workflow as a basis for customization, be sure to make a copy of the workflow, rename the copy, edit it as needed, and then deploy it. Making a copy of a workflow ensures that your customizations will not be overridden if we need to update the out-of-the-box workflows.
- If you have customized any of the out-of-the-box workflows, you must edit the
 names and process IDs of the relevant workflows before upgrading, to avoid your
 customizations being overwritten during the upgrade. For complete information
 on how to edit a workflow name and process ID, go to Change the diagram
 process properties and the accompanying workflow documentation and tutorials
 on the Collibra Developer Portal.

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Prerequisites

• You have previously installed Data Privacy 2021.10.

Note Only incremental upgrades are supported. This means, for example, that if you are using Data Privacy 2021.07 and you want to upgrade to 2022.01, you must first upgrade to 2021.10. Only from 2021.10 can you update to 2022.01.

- At a minimum, you have Collibra Platform 2020.09
- You have downloaded the CMA files from the Collibra Community Downloads page.
- The following are true of your Collibra Platform environment, with regard to Data Privacy out-of-the-box asset types and relation types:
 - The out-of-the-box hierarchy of parent/children asset types are maintained in your Collibra environment. The UUIDs of the out-of-the-box asset types are also maintained in your environment.
 - The out-of-the-box relation types (specifically, the combination of head asset types, roles, co-roles, and tail asset types) are maintained in your Collibra environment. The UUIDs of the out-of-the-box relation types are also maintained in your environment.

Warning We strongly advise that you not customize the Data Privacy operating model.

Upgrade files

Separate CMA files exist for CCPA and GDPR. If you have purchased both CCPA and GDPR, you need both CMA files. CMA files are available on the Downloads page.

Upgrade Data Privacy

This procedure guides you through a Data Privacy upgrade.

Warning If you have purchased both CCPA and GDPR modules, you need to complete this procedure for one of the modules, and then complete it again for the other.

Steps

- 1. Create a full Console export file for your Collibra Platform environment.
- 2. Sign in to Collibra using an account with Sysadmin privileges.
- 3. On the main toolbar, click \rightarrow **Settings**.
 - » The Settings page opens.
- 4. In the tab pane, click **Migration** \rightarrow **Import**.
 - » The Migration Import page opens.
- 5. Upload the CMA file.
 - » Collibra validates the file and automatically downloads an import simulation report to your computer. It might take a few minutes to generate and download the report.
- 6. Select Please confirm that a current backup containing data and history was made, and then click Import.
 - » Collibra imports the CMA file and automatically downloads an import report.
- 7. Click Done.
- 8. If necessary, edit the **wf_configuration_stAssetTypes** configuration variable in the Review Request handler workflow.

Note The configuration variable value must refer to gdprTechnologyWizard.

- a. On the main toolbar, click \rightarrow **Settings**.
 - » The Settings page opens.
- b. Click Workflows \rightarrow Definitions.
- c. Click the Review Request handler workflow.
- d. In the Variables section, find the wf_configuration_stAssetTypes configuration variable. It might refer, for example, to gdprProposeTechnologyWizard. Ensure that it correctly refers to gdprTechnologyWizard, as shown in the following image.

Review Request handle Status: Enabled	r		
Overview	Variables		Edit
Flow	These variables are accessible in the workfl	ow.	
	Name	Description	Value
	wf_configuration_stAssetTypes	The csv (,) string of csv (,) strings that represent the metadata on how to treat the impacted asset assetType	0000000-000-0000-0000- 00000003113;gdprEdnsinessProcessWizard;0;0;1;1;c0e0000-000-0000-0000- 0000000355;gdprFiskViewizard;0;0;1;1;c0e0000-000-0000-0000- 000000355;gdprFiskViewizard;0;0;1;1;c0e0000-000-0000-0000- 0000003131;gdprDataSharingAgreementWizard;0;0;1;1;c0e00000-0000-0000- 0000-0000003131;gdprDessingActivityWizard;0;0;1;1;c0e00000-0000-0000- 0000-0000003131;gdprDessingActivityWizard;0;0;1;1;c0e00000-0000-0000- 0000-00000003131;gdprDessingActivityWizard;0;0;1;1;c0e00000-0000-0000- 0000-0000000031031;gdprDessingActivityWizard;0;0;1;1;c0e00000-0000-0000- 0000-0000-0000-00000-0000039059;gdprDipWizard;0;1;0;0;CIA -> cc0e0000-0000-0000-000039055;gdprComplianceSelfAssessmentWizard;1;0;0;CSA - >,000000013;gdprTechnolgyWizard;0;1;1;c0e00000-0000-0000- 00000000026;gdprTechnolgyWizard;0;1;1;c0e0000-0000-0000- 000000001310;gdprTechnolgyWizard;0;1;1;c0e00000-0000-0000- 00000000000000000000

- If it does, there is nothing more to do.
- If it does not, you must edit it.
- e. Click d to edit the value of the configuration variable.
- f. Change every instance of the old workflow reference to gdprTechnologyWizard.

Tip Copy the entire configuration variable value into a text editor, replace every instance of the old string by **gdprTechnologyWizard**, and then paste the new value into the value field.

g. Click Save.

What's next?

If you have purchased both CCPA and GDPR modules, complete this procedure again for the module that you have not yet installed.

Installation of out-of-the-box resources

During installation, the installer searches for all resources (for example, communities, domains, assets, relations, asset types, resource roles, and workflows) by UUID in the default location. If a particular resource is not found, it is created during the installation. If the newly created

resource has the same name as an existing resource, the name of the existing resource is amended with the following suffix: **_migration_timestamp**.

Tip After installation is complete, we recommend searching for the word **migration** in Collibra to see which, if any, resources have been renamed, and to reconcile any conflicts that could arise due to the name change.

Import reporting

When you upload a CMA file for importing, Collibra Platform generates and automatically downloads an import simulation report in the Microsoft Excel format. This report contains sheets with the following pre-import information:

- Summary
- Processed resources
- Added resources
- Changed resources
- Added customization files
- Logs

When the CMA file is then imported, Collibra generates and automatically downloads an import report to confirm the actual changes made to your Collibra environment.

Post-upgrade procedures

After you have successfully upgraded Data Privacy, we recommend performing the following post-upgrade procedures:

- Update Privacy Dashboard links
- Delete the Identifier attribute

Update Privacy Dashboard links

Follow this procedure to update links in the Privacy framework section of the Privacy Dashboard.

Steps

- 1. Access the Privacy Dashboard.
- 2. Click $\vdots \rightarrow$ Edit Dashboard.
- 3. On the Privacy Framework text widget, click $\vdots \rightarrow$ Configure.
- 4. On the **Content** tab, scroll down to the Data retention periods section.
- 5. Click the standards link, and then click Edit.
 - » The Link to URL dialog box appears.
- 6. In the **URL** field, replace the current value with /search?q=*&asset_type=00000000-0000-0000-000000031206, and then click **Save**.
- 7. Scroll further down in the same widget and click the roles and responsibilities link.
- 8. Click Unlink, and then click Save.
- 9. In the upper-right corner of the page, click Save.

Delete the Identifier attribute

The Identifier attribute (UUID c0e00000-0000-0000-0001-000500000043) is no longer part of the Data Privacy operating model and can be deleted.

Steps

- 1. On the main toolbar, click \rightarrow **Settings**.
 - » The Settings page opens.
- 2. Click Workflows.
 - » The Workflows settings page appears on the Definitions tab page.
- 3. In the table, find the Review Request Handler workflow and click it.
- 4. In the Variables section, click 🖍.
 - » The Variables dialog box appears.
- 5. In the variable field **The csv (,) string of csv (;) strings that represent the metadata on how to treat the impacted asset assetType**, delete the following strings:
 - 0000000-0000-0000-0000-00000031301;gdprProcessingActivityWizard;0;0;1;1;
 - c0e00000-0000-0000-0000-0000000264;gdprProcessingActivityWizard;0;0;1;1;

Variables

These variables are accessible in the workflow.

The csv (,) string of csv (;) strings that represent the metadata on how to treat the impacted asset assetType

The status when the issue is rejected

0000000-0000-0000-0000-000000005010

The status uuid that the new created asset should get initially

Tip Copy the entirety of the value in the variable field and paste it into a text editor. You can then easily find and delete the two strings and copy/paste the remaining value into the variable field.

6. Scroll to the bottom of the Variables dialog box, and then click Submit.

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Preparation

This section:

- Introduces key concepts, such as the community-domain structure, moving out-of-thebox domains, resource roles and responsibilities, key asset types and mappings, and third-party register.
- Helps to ensure that the right information is established for legal terms, policies, thirdparties, systems and so forth. These are used as a way to constrain choices, so that information captured in the next phases is consistent and compliant.

Preparation methodology

Although there is no one method for setting up a data privacy program within Data Privacy, the following methodology addresses common, critical elements.

Out-of-the-box resources

To help you get up and running as quickly as possible with your compliance program, Data Privacy comes with the following out-of-the-box resources:

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Organization Browser	Resource	Description
 ◇ △ Data privacy building blocks > △ Asset change management > △ CCPA building blocks > △ GDPR building blocks > △ Sample content ☐ Countries and states ☐ Countries and states 	Data privacy building blocks community	A top-level data privacy community that centralizes all your privacy-related data.
 □ Data categories □ Data subject categories □ Processing categories □ Risks and Controls □ Third Party Contracts □ Third Party Privacy Profile 	Asset change management community	Community and domains that help you monitor your business and assessment assets and keep them up-to-date.
	3 Regulation- specific communities and domains	Communities and domains dedicated to the specific regulations with which you need to comply.
	Sample content	Community and domains with sample content that you can edit and use to suit your needs.
	5 Common data privacy domains	Domains with essential privacy-related assets.

Data Privacy building blocks community

Data Privacy comes with an example operational organization structure, composed of communities, subcommunities, and domains. This structure is designed to meet your needs, whether you need to comply with one or several data privacy regulations.

The Data privacy building blocks community contains:

- Top-level domains that are applicable to all data privacy regulations.
- Subcommunities and domains that are applicable to specific data privacy regulations.

Top-level domains

The following table shows the domains in the Data privacy building blocks community.

Domain	Contents
Countries and states	Jurisdiction assets, for example, United States and Belgium.
Data categories	Data Category assets, for example, Payroll Information, Location Data, and Contact Information.
Data subject categories	Data Subject Category assets, for example, Applicants, Children, and Visitors.
Processing categories	Processing Category assets, for example, Archiving, Retrieval, and Storage.

Asset change management community

This community contains the following domains, which are applicable to all regulations with which you must comply.

Domain	Contents
Cron codes	Cron-related Code assets for use with Time-based Review Rule assets.
Event-based review rules	Assets used to trigger the review of related assets, based on changes to specified attributes or relations of related assets.
Frequencies	Business Term assets that describe various time frequencies, for example, every year, on the 15th of April. These assets are related to Code Value assets that represent cron values matching Business Term descriptions, for example, "0 0 0 15 APR".
Review Request classifications	Issue Category assets that describe the three types of review requests: time- based, event-based, and manual review requests.
Time-based review rules	Assets used to trigger the review of other assets after an elapsed amount of time.

CCPA building blocks community

This community contains the following CCPA-specific domains.

Domain	Contents
CCPA articles	Assets that represent articles of CCPA.

Domain	Contents
CCPA glossary	CCPA-related Business Term assets.
CCPA purposes	Purpose assets to which Business Process assets can refer.
CCPA-specific data categories	Data Domain assets, as specified by CCPA.
CCPA-specific data subject categories	Data Subject Category assets, as specified by CCPA.
Legal bases under CCPA	Legal Basis assets, as referred to for processing personal data.
PIA evaluation rules inventory	Threshold Assessment Rule assets, which represent the individual questions used in the PIA workflow.
Sample remediation actions and plans for CCPA	Sample Remediation Action and Remediation Plan assets.

GDPR building blocks community

This community contains the following GDPR-specific domains.

Domain	Contents
DPIA evaluation rules inventory	Threshold Assessment Rule assets, which represent the individual questions used in the DPIA workflow.
Data protection authorities	Party assets of Party Role Type Supervisory Authority.
GDPR Glossary	GDPR-related Business Term assets.
GDPR articles	Assets that represent articles of GDPR.
GDPR purposes	Purpose assets to which Business Process assets can refer.
GDPR-specific data categories	Data Category assets, as specified by GDPR.

Domain	Contents
GDPR-specific data subject categories	Data Subject Category assets, as specified by GDPR.
Legal bases under GDPR	Legal Basis assets, as referred to for processing personal data.
Sample remediation actions and plans for GDPR	Sample Remediation Action and Remediation Plan assets.

Sample content community

This community contains the following domains, which are applicable to all regulations with which must comply.

Note The sample content is not installed during the product installation procedure. There is a separate CMA file for the sample content for each regulation.

Warning The sample resources are strictly illustrative. They should not be edited. Editing the attributes of the sample resources might result in an error during any subsequent attempt to run the sample content installation file.

Domain	Contents
Sample HR processes	Sample Business Process assets for Human Resources-related processes.
Sample IT processes	Sample Business Process assets for IT-related processes.
Sample application inventory	Sample Application assets.
Sample assessment register	Sample assessment assets, for example, PIA assets and Legitimate Interest Assessments assets.
Sample corporate data policies	Sample Policy assets.

Domain	Contents
Sample data dictionary - MDM application Sample data dictionary - Workday application Sample data dictionary - Workforce application	 Physical Data Dictionaries for MDM system, Workday application, and Workforce application. Used to demonstrate GDPR Solution lineage capabilities on sample data assets. Your specific dictionary could be split into multiple domains and could be governed by a different governance model.
Sample data sets	Samples of Data Set assets that can be edited and related to your Business Process assets.
Sample Data Sharing Agreements	The formal contracts that document which data is shared between Controllers and Processors and how the data can be used.
Sample end-user computing inventory	
Sample internal parties (legal entities)	Internal Processors and Controllers of any personal data.
Sample lines of business	Sample Line of Business assets (also known as business areas) in a hierarchical way.
Sample marketing processes	Sample Business Process assets for marketing-related processes.
Sample personal data glossary	Sample Business Term assets, for example, marital status and customer address.
Sample remediation actions and plans	Sample Remediation Action assets and Remediation Plan assets.
Sample risk and controls register	Sample Risk assets and Control assets.
Sample safeguard register	Sample Safeguard assets.
Sample third-party privacy profiles	Sample Party assets.

Privacy asset model

The following images provide an overview of the Data Privacy asset model, which provides an exhaustive description of:

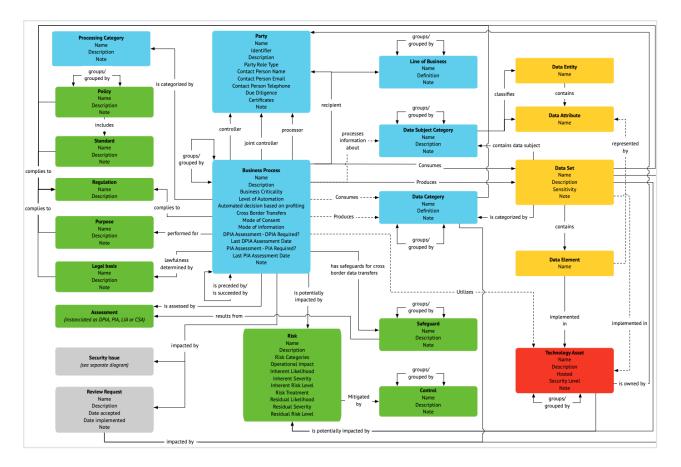
- The responsible parties that must document and report data processing activities.
- Mandatory processing activity information that must be reported.

To provide visual clarity, the asset model is depicted in the following images with primary focus on three main asset types:

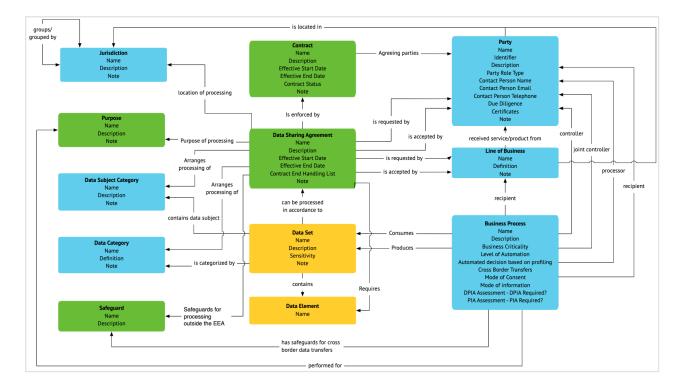
- Business Process
- Data Sharing Agreement
- Security Issue

Each color in the images represent a different asset type:

- Blue: Business Assets
- Yellow: Data Assets
- Green: Governance Assets
- Red: Technology Assets
- Grey: Issue Assets

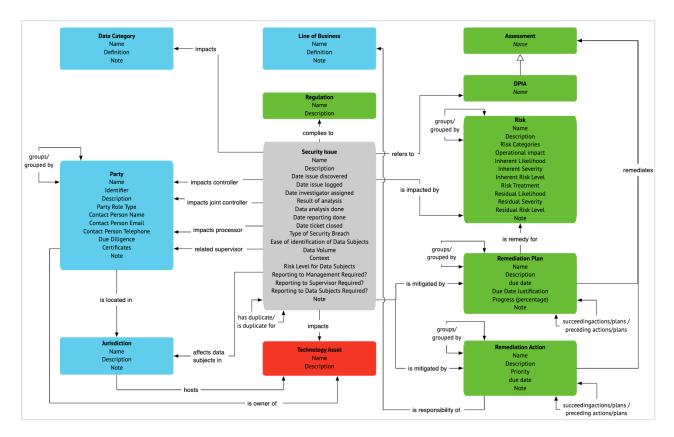


Focus on Business Process assets



Focus on Data Sharing Agreement assets

Focus on Security Issue assets



Setting up your community-domain structure

Note This task applies only if your organization is new to Collibra and no community-domain structure is in place.

Things to consider

When working with Collibra, you can be as granular as you want when setting up your communities and subcommunities. There are no restrictions as to the rationale you use for creating your communities. However, as data privacy regulations focus mainly on business processes that produce and consume data, we find the following approach to be straightforward and effective:

1. One community per line of business. For example Sales, Marketing, Engineering, IT and Human Resources.

- One or more subcommunities per community.
 For example Payroll, Benefits and Talent Acquisition could be considered three subcommunities that are grouped by the line of business Human Resources.
- 3. One Process Register domain per community and subcommunity, for storing your Business Process assets.
- 4. One Assessment Review Register domain per community and subcommunity, for storing your Assessment Review assets.
- 5. One Business Dimensions domain per community and subcommunity, for storing your Party assets.

Note The out-of-the-box community-domain structure includes:

- Domains with regulation-relevant assets, which serve as registers to which you can create additional in-kind assets.
- Domains that serve as default domains when creating new assets. For example, the New Applications domain, which serves as the default domain for any new Technology Assets you create.

Tip If not already in place:
 Create your communities and subcommunities, based on your organizational structure and business needs. For example: a. Create a Human Resources community. b. Create Benefits, Payroll and Talent Acquisition communities within the Human Resources community.
 2. Create the following domains in each of the communities you created in step 1: a. A domain of the type Process Register, for storing your Business Process assets and Safeguard assets. b. A domain of the type Assessment Register, for storing you PIA and DPIA assets. c. A domain of the type Business Dimensions, for storing your Party assets. » The new community-domain structure appears in your Organization Browser.
A Human Resources Benefits Assessments Register Benefits Assessment Register Payroll Assessment Register Payroll Assessment Register Assessment Register Talent Acquisition Assessment Register Human Resources Assessment Register Human Resources Process Register

Moving out-of-the-box resources

The following communities must not be deleted or edited, but they can be moved:

• Data Governance Council.

This community is installed by the Collibra Platform installer, meaning it is not specific to Data Privacy. It includes domains that are the default domains for the onboarding of assets of certain asset types.

- Asset Change Management.
 This community is needed for certain asset change management process workflows.
- The building blocks communities of the relevant regulations, for example, the CCPA Building Blocks community.

These communities include privacy regulation-specific resources, such as Purpose, Data Category, and Data Subject Category assets. The domains highlighted in the following table must not be deleted or edited. You should, however, move them to the relevant communities within your community-domain structure.

Note The regulation-specific sample content referred to in the following table is available via CMA installation files that are separate from the Data Privacy CMA installation file.

Organization Browser



Description

Domains of sample assets, such as Data Set assets and Line of Business assets. You can refer to these assets as templates for creating assets of the same asset type.

Move these domains to the relevant communities within your communitydomain structure.

Warning The sample resources are strictly illustrative. They should not be edited. Editing the attributes of the sample resources might result in an error during any subsequent attempt to run the sample content installation file.

Domains of privacy-related assets that you will need as you perform your data governance activities, for example, Processing Category assets and Data Subject Category assets.

Tip In the Description attribute of each domain are suggestions as to where you might want to move these domains. You can delete these suggestions from the Description attribute after moving the domains.

Tip

- Identify the relevant team in your organization for each of the domains in the Data privacy building blocks community.
 For example, you identify that the Finance department is best suited to take
- responsibility for the Sample finance and risk processes domain.
- 2. Move each domain to the relevant community in your community-domain structure.

For example, you might move the Sample finance and risk processes domain to your Finance department's community.

3. Create any additional domains you might need, based on the advice in the Description attribute of the "sample" domains.

Privacy resource roles and permissions

A resource role is a role that consists of resource permissions and applies to a resource and its children. For example, if you assign a resource role to a domain, it also applies to all assets in the domain. If you assign a resource role to a community, it also applies to all its subcommunities, domains and assets in the community. The purpose of resource roles is to grant resource permissions to users through a responsibility. For example, they determine which users can edit assets via the asset page or in a workflow.

The following table shows the out-of-the-box privacy-related resource roles.

For the list of resource roles that are available out of the box in Collibra Platform, go to Resource roles.

Resource role	Description
Business User	A user with responsibility over a domain, subject or process.
CISO	A senior-level executive within an organization responsible for establishing and maintaining the enterprise vision, strategy, and program to ensure information assets and technologies are adequately protected.
Data Protection Officer	An enterprise security leadership role required by the General Data Protection Regulation (GDPR). This role is responsible for overseeing data protection strategy and implementation, to ensure compliance with the relevant regulations.

Resource role	Description
Data Steward	A role within an organization responsible for using an organization's data governance processes to ensure fitness of data elements—both the content and metadata. Data Stewards have a specialist role that incorporates processes, policies, guidelines, and responsibilities for administering organizations' entire data in compliance with policy and/or regulatory obligations. A Data Steward may share some responsibilities with a Data Custodian.
Privacy Steward	A role within an organization responsible for utilizing an organization's data governance processes to ensure compliance. Data Privacy Stewards have a specialist role that incorporates processes, policies, guidelines, and responsibilities for determining with which policy and/or regulatory privacy obligations organizations' data should comply.

Data privacy resource permissions

A resource permission is a permission that applies to a resource and its children. It can be added to a resource role.

The following image highlights some of the out-of-the-box resource permissions for the resource roles Business Steward and Data Protection Officer. Notice that, by default, the Business Steward has all available asset-related permissions.

As Data Protection Officers have more of an advisory role, they likely have little interest in the day-to-day governance of individual assets. As such, the resource permissions configured for the Data Protection Officer are limited. By default, the Data Protection Officer can add comments, add attachments, and manage workflows.

Tip

Note You can fully develop and maintain your data privacy and risk program with the out-of-the-box resource roles and configured permissions. You can skip this task if you have no specific use case for additional roles or permissions.

- 1. Determine whether or not your organization requires any additional resource roles to successfully govern your data privacy-related resources. If so, you can create new resource roles or edit the out-of-the-box resource roles.
- 2. Ensure that each resource role has the necessary resource permissions to enable the assigned users to fulfill their business responsibilities. Pay particular attention as to whether or not a specific resource role will participate in the management of workflows or carry out workflow tasks. If so, the role must have the **Manage workflows** resource permission. For more information, go to Add or remove resource permissions for a resource role.

Important privacy-related personas

The following is an overview of the most important personas in Data Privacy. For each persona, we have added a radar chart that plots their expected skills and expertise.

Persona functions versus the out-of-the-box resource roles

The function mentioned in the bio of each persona relates to that persona's job within the organization. They can be viewed as job titles. Although these functions connote many of the out-of-the-box resource roles, they are not linked. For example, John Fisher's function, or job title, is Business Steward. That does not mean, however, that he is the only person in the organization that will be assigned the Business Steward resource role when working in Data Privacy.

Preston Sterling, whose job title is Privacy Officer, will certainly be assigned the Privacy Steward resource role for various resources in Data Privacy, but he will also be assigned the Business Steward resource role when onboarding risks during the risk assessment. This is so, because Risks require closer consideration from someone whose primary job focus is on riskrelated matters. Furthermore, the risk assessment is configured to be completed, in large part, by a user assigned the Business Steward resource role. In other words, one person with the right skills and expertise might be assigned to multiple resource roles.

It could also be advantageous to have one person assigned to multiple resource roles, for example Owner and Stakeholder, in the same domain. This is particularly interesting for smaller organizations that work in smaller teams.

William Parker



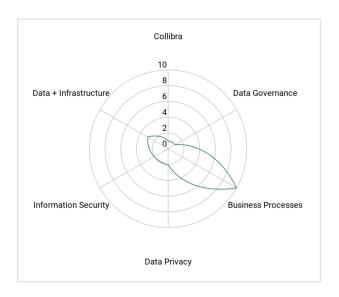
Function

Senior Marketing Analyst

Responsibilities

- Providing input on how the business processes personal data.
- Collaborating with John Fisher during the onboarding of business processes.

Skills and expertise



John Fisher



Function

Business Steward

Responsibilities

- Collaborating with the business, to onboard and describe business processes.
- Ensuring the stakeholders are involved during the onboarding of business processes and processing their feedback.
- Performing DPIA/PIA.
- Onboarding data sharing agreements, along with Preston Sterling.

Skills and expertise



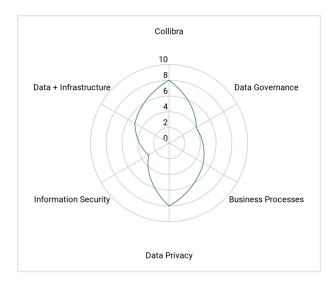
Preston Sterling



Function

Privacy Officer

- Determining the legal bases and purposes for business processes.
- Indicating whether business processes constitute cross-border transfers and the controls needed when that's the case.
- Determining the Controller, Joint-Controllers, Processors and Third-Parties for business processes.
- Determining whether a DPIA/PIA is required.
- Helping John Fisher execute DPIA/PIA.
- Reviewing and assessing whether or not the DPIA/PIA has been correctly completed and whether its conclusions (whether or not to go ahead with the processing and which safeguards to apply) are in compliance with the GDPR/CCPA.
- Managing data sharing agreements and other privacy controls.
- Mapping data categories and data subject categories to the logical data model.
- Planning remediation actions to address outstanding risks detected during assessments or data breaches.
- Setting up the risk and control register, along with Dora Portman and Cis Souchek.
- Setting up third-party privacy profiles.



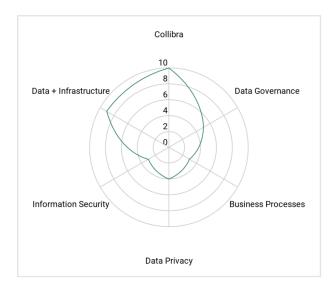
Luke O'Reilly



Function

Data Engineer

- Mapping business processes to data sets (data mapping).
- Onboarding technology applications to the application inventory.
- Useing Catalog's Automatic Data Classification and Guided Stewardship for personal information discovery.



Dora Portman

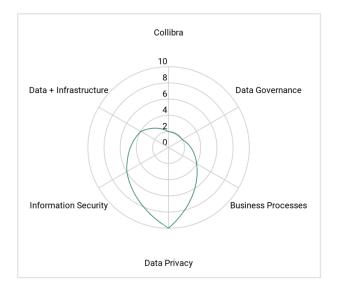


Function

Data Privacy Officer

- Determining privacy and data classification policies.
- Determining retention policies.
- Mapping data categories to data classification policies and privacy regulations.
- Determining DPIA/PIA threshold rules.
- Reviewing DPIA/PIA.
- Reporting, in case of a data breach.
- Determining the purpose register.

- Planning remediation actions to address outstanding risks detected during assessments or data breaches.
- Reporting progress of privacy program to senior management.
- Regulatory reporting.



Christina Souchek

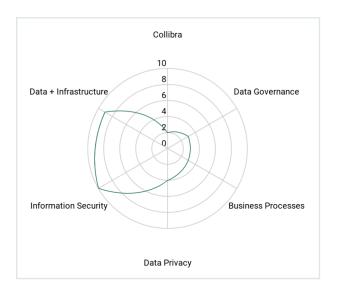


Function / Resource role

Chief Information Security Officer (CISO)

- Managing the application inventory.
- Managing the risk and control register, along with Dora Portman and Preston Sterling.

- Determining what went wrong in a breach, dealing with those responsible if they're internal, and planning to avoid repeats of the same crisis (investigations and forensics).
- Ensuring all of the above initiatives run smoothly and get the funding they need, and ensuring corporate leadership understands their importance (governance).



Persona tasks

The following table provides an overview of the resource role and tasks required for each of the main privacy-related workflows. The resource roles are mapped to the required tasks for each workflow, in Collibra Platform.

Tip Keep in mind that some personas, for example Preston Sterling, our Privacy Officer, is assigned the Business Steward role for certain resources and workflows, in addition to his more intuitive assignment to the Privacy Steward role, for other resources and workflows.

Business Process workflow

Persona	Resource role	Task
	Business User	 Describes: The business process at a high level. The data that is used. The applications that are involved. With whom the data is shared.
	Business Ste- ward	Aligns with the Business User to ensure the business process is accurately described and conforms to the data model.
	Data Steward	Finds a data set that corresponds to the description provided by the Business User and the Business Steward, and maps it to the business process. If the data set does not exist, he onboards a new data set.
	Privacy Steward	Validates or completes the legal meta-data, such as the purpose and legal basis for processing the data, and the cross-border indicator.
	Owner	Accepts ownership and approves the business process.
	Stakeholder	Optionally provides feedback during the onboarding of the business process.

Data Set workflow

Persona	Resource role	Task
	Business Steward	 Onboards the data set. Adds the data categories, data subject categories and business terms. Maps the data set to the business process and the technology assets.
	Owner	Accepts ownership and approves the data set.
	Stakeholder	Optionally provides feedback during the onboarding of the data set.

Technology Asset workflow

Persona	Resource role	Task
	Business Ste- ward	 Onboards the technology asset. Determines the vendor and the jurisdiction.
	Owner	Accepts ownership and approves the technology asset.
TBD	Stakeholder	Optionally provides feedback during the onboarding of the asset.

-

Data Sharing Agreement workflow

Persona	Resource role	Task
	Business Steward	 Onboards the data sharing agreement. Determines the legal aspects, such as the purpose and location of processing.
or		
R	Owner	Accepts ownership and approves the data sharing agreement.

Assessment (DPIA/PIA, LIA and CSA) workflows

Persona	Resource role	Task
	Business Ste- ward	Completes the assessment.
	Privacy Ste- ward	Provides feedback during the onboarding of the assessment.

Persona	Resource role	Task
R	DPO	Optionally provides feedback during the onboarding of the assessment.
	Owner	Accepts ownership and approves the assessment.
	Stakeholder	Optionally provides feedback during the onboarding of the assessment.

Risk workflow

Persona	Resource role	Task
	Privacy Steward (Preston Sterling or other, depending on the type of risk.)	 Onboard new privacy and security risks. Determines their nature and the mitigating controls.
or		
TBD		

Persona	Resource role	Task
	Owner	Accept ownership of and approve the risks.
R	(DPO or CISO, depending on the type of risk)	
or		

Stakeholder	Optionally provides feedback during the onboarding of the
	risks.

Remediation Plan and Remediation Action workflow

Persona	Resource role	Task
20	Business Steward	Onboard remediation plans and actions to address out- standing privacy and security risks.
S	(Preston Sterling or other, depending on the	
or TBD	type of risk being addressed.)	
R	DPO	Optionally provides feedback during the onboarding of the remediation plans and actions.

Persona	Resource role	Task
or	Owner (DPO or CISO, depending on the type of risk being addressed.)	Accepts ownership and approves the remediation plans and actions.
	Stakeholder	Optionally provides feedback during the onboarding of the remediation plans and actions.

Security Breach Managment Workflow

Persona	Resource role	Task
	Anyuser	Logs a potential data breach.
	Community Man- ager	Assigns investigation manager.
	Investigation Manager	Analyzes impact of the data breach.
R	DPO	Reviews analysis of the data breach and reports, when neces- sary.

Creating responsibilities

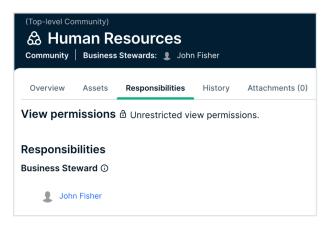
A responsibility is the assignment of one or more users and/or user groups to a resource role for a resource. An example of a responsibility would be user John Fisher assigned the Business Steward resource role for a Process Register domain.

After assigning users or user groups to a resource role for a resource, the users can act on the permissions conveyed to them via the resource role.

Before creating responsibilities, it is essential to:

- Decide which resource roles are needed to effectively govern your communities, domains, and assets.
 - For example, you decide to assign a Data Protection Officer for each community.
- Identify the people in your organization best suited to perform the tasks expected of the various resource roles.

The following image shows the responsibility where the resource role Business Steward has been assigned to user John Fisher for the Human Resources community.



Inherited responsibilities

Child resources inherit responsibilities from their parent resources.

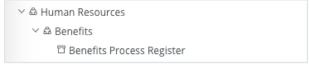
 If the resource is a community, the responsibilities are inherited by subcommunities, domains, and assets in the community. If you are a Business Steward for a certain community, you are a Business Steward for all the domains and assets inside that community.

- If the resource is a domain, the responsibilities are inherited by the assets in the domain.
- If the resource is an asset, the responsibilities apply only to the asset itself because assets never have children.

Note Inherited responsibilities do not show up in a table or preview and they are not exported.

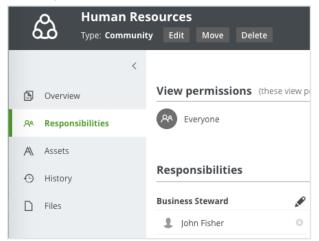
Example

Consider the following community-domain structure:



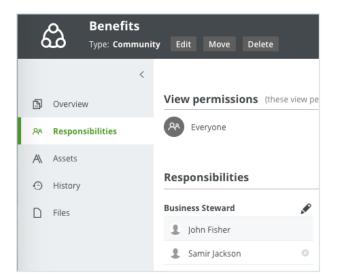
In this case, you could perform the following steps:

 Create responsibilities for the Human Resources community, knowing that the Benefits subcommunity, the Benefits Process Register domain, and the assets within will inherit the responsibilities.



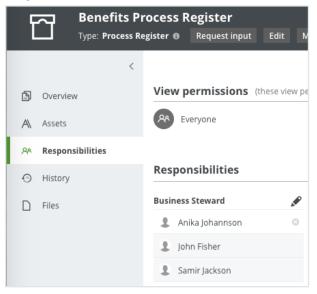
2. If necessary, create any additional responsibilities at the subcommunity and/or domain levels.

As Samir Jackon is the subject matter expert for benefits-related data, he has been added as a Business Steward for the Benefits community.



Note The gray background behind "John Fisher" indicates that the responsibility was inherited from the Human Resources community. The white background behind "Samir Jackson" indicates that the responsibility was directly created for the Benefits community.

As Anika Johannson is the person most closely tracking the Benefits department's business processes, she has been added as a Business Steward for the Benefits Process Register domain.



3. If necessary, create any addition responsibilities at the asset level.

The following table shows the resource roles that have to be present as responsibilities, for specific domains, for the Data Privacy workflows to work, where:

- M: Mandatory
- O: Optional

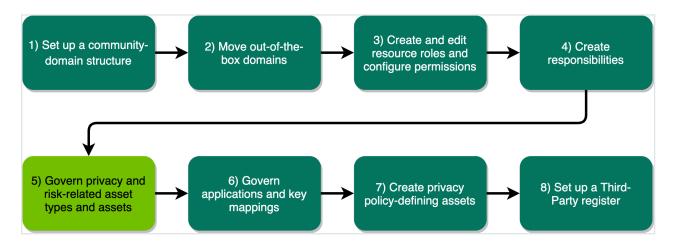
Domain type / Resource role	Owner	Business Steward	Privacy Steward	Data Ste- ward	Business User	Community Manager
Process Register	Μ	Μ	М	М	Μ	0
Assessment Register	Μ	Μ	0	0	0	0
Remediation Register	Μ	Μ	0	0	0	0
Risk and Con- trols Register	Μ	Μ	0	0	0	0
Data Usage Registry	Μ	Μ	0	0	0	0
Application Inventory	Μ	Μ	0	0	0	0
Data Governance Council	0	0	0	0	0	Х

Тір

- 1. Identify which resource roles you need to effectively govern your communities, domains, and assets.
- 2. Identify the people in your organization who will take on these roles, for example, Data Protection Officer, Business Steward, Privacy Steward, Issue Manager, Owner, and so on, for your various resources.
- 3. Create the following responsibilities for each of your domains:
 - $^{\circ}$ Owner
 - Business Steward
 - Data Steward
 - Privacy Steward
 - Stakeholder
 - Business User
- 4. Create the Community Manager and Privacy Steward responsibilities for the New Data Issues domain. These responsibilities are required for the Log Potential Security Breach and Security Breach Management workflows.

Note The New Data Issues domain is in the Data Governance Council community. It is hidden in the community-domain browser to avoid it being inadvertently deleted. You can find the domain by searching for it via the Search field

Privacy and risk-related asset types and assets



This section provides information on the assets and asset types that are required by Data Privacy, to effectively manage your privacy and risk program.

Tip There are several ways to create assets, such as via the Data Privacy asset onboarding workflows. To create assets in bulk, you can perform what we refer to as the export/import roundtrip. For complete information, see Import assets in the Documentation Center.

Privacy regulation in Business Process assets

The **Summary** tab on the asset pages of Business Process assets may contain a special section for Privacy regulations. This section is shown only if:

- You have the Product Rights > Privacy or Resources > Manage all resources global permission.
- Privacy landing page is enabled.
- The **Privacy** widget is added to the Business Process asset type.

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Tip If you want to hide the Privacy section from Business Process asset pages, you can remove the **Privacy** widget via the layout editor for the Business Process asset type. For more information, go to Edit your layout.

Remove regulation tabs

This topic is applicable only to the classic UI.

The following Data Privacy asset types, including their related workflows and asset pages, are deprecated and are no longer included in the Data Privacy CMA installation files. You can remove the regulation tabs such as **CCPA** and **GDPR** from the corresponding asset pages.

- CSA
- DPIA
- PIA

You can also remove the regulation tabs from the asset pages of Business Processes.

Steps

To remove the regulation tabs:

- 1. Open Collibra Console with a user profile that has the SUPER role.
 - » Collibra Console opens with the Infrastructure page.
- 2. Click Data Governance Center service of a Collibra DGC environment.
 - » The details of the Data Governance Center service are shown.
- 3. Click Infrastructure Configuration.
- 4. Click JVM configuration.
- 5. Click Edit configuration.
- 6. Scroll to the bottom of the list of JVM parameters and add one or both of the following parameters, as required.

Parameter	Description
-Dfeature.privacyLegacyAssessmentsCustomAssetPages=false	Removes the regulation tabs from the asset pages of the following deprecated asset types: CSA, DPIA, and PIA.
-Dfeature.privacyCustomAssetPages=false	Removes the regulation tabs from the asset pages of the Business Process asset types.

7. Click Save all.

Required assets for out-of-the-box Data Privacy workflows

The following table show the types of assets that must be present in your Collibra Platform environment for the associated workflows to work.

Warning It is important to understand the significance of these asset types and the definition of the individual assets of these asset types. For example:

- The definition of a Data Category asset might make the difference between compliance and non-compliance with a specific regulation.
- The definition of a Purpose asset might forbid you from accommodating a data subject's right to be forgotten.

Asset type	Business Process onboarding workflows	Data Set onboarding workflows	Asset change management workflows	Technology Asset onboarding workflows
Policy	Х			
Technology Asset	Х	Х		
Purpose	Х			
Legal Basis	Х			
Data Category	Х	Х		
Data Subject Category	Х	Х		
Party	Х			Х
Line of Business	Х			
Data Set	Х			Х
Regulation	Х			
Safeguard	Х			
Business Process		Х		
Data Element		Х		
Data Sharing Agreement	Х			
Remediation Action				

Asset type	Business Process onboarding workflows	Data Set onboarding workflows	Asset change management workflows	Technology Asset onboarding workflows
PIA Evaluation Rule				
Review Rule			Х	
Code Value			Х	
Retention Period (child of Standard)		Х		
Regulation	Х			
Jurisdiction				Х
Processing Category	Х			

Asset types by category

The following table shows the five categories of asset types.

Category	Description
Technology Assets	Physical assets used to process, transmit, analyze, and store information.
Data Assets	A type of asset that represents details of organizational data.
Business Assets	A type of asset that is exclusively used and governed by the business user community.
Governance Assets	A type of asset that is used to monitor and advocates to maximize performance or utilization of other Business and Data assets while minimizing the risk factors in alignment with Organizational/Business goals.
Issues	Various types of issues to be tracked: Data Issue, Security Issue, and Review Request

Technology assets

Technology assets represent the physical assets your organization uses to process, transmit, analyze and store information.

The global assignment for Technology Assets includes, among others, characteristics that allow you to identify:

- In which Technology Assets your personal data resides, and the security level of these assets.
- By which applications your personal data is being consumed and produced.
- In which jurisdiction your personal data is being hosted.
- Which risks and security issues could impact your applications.

The following table shows the relevant Technology asset types and example descriptions.

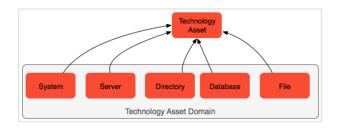
Asset type	Example description
Technology Asset	A piece of information technology (hardware, software, database, software platform) that helps an organization run a business application.
Application	A classification of computer program designed to perform specific tasks, such a word processing.
Database	A collection of data that is systematically organized or structured in order to make it easy to create, update and query the information.
Directory	An organizational structure that contains files and/or other directories.
End User Tool	A way in which a user can interact with data at rest, with manual intervention, to manipulate or consolidate data.
File	A collection of data that is treated by a computer as a unit, for the purposes of input and output.
File Group	A collection of physical files which, together, represent a single logical file.
Network	A computer network or data network is a digital telecommunications network that allows nodes to share resources. In computer networks, network-connected computing devices exchange data with each other using a data link.
Paper Docu- ment	A carrier of data in paper form.

Asset type	Example description
S3 Bucket	An asset type that represents buckets in an Amazon S3 repository.
Server	A computer program or device that supports other computer programs and their users.
Software	Software is a collection of instructions that enables the user to interact with a computer or its hardware and perform tasks.
System	Executable software that you can buy commercially off the shelf (COTS), or build internally, to automate one or more business functions that help run a business smoothly and efficiently.

Technology assets should be inventoried and related to all relevant policies, including:

- Policies pertaining to the type of information stored in the assets.
- Policies that address the handling and storage of backups.
- Asset end-of-life and disposal policies.
- Jurisdiction-focused policies.

Technology Assets by domain



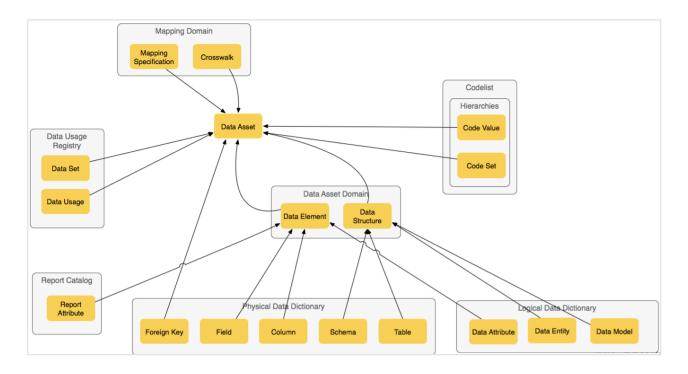
Tip Consider creating high-level Technology Assets first, such as Systems and Applications. Later, you can add more granular-level assets. In the global assignment of the relevant asset types, you can view the default attributes configured for each asset type. You can add any additional attributes to suit your needs.

Data Assets

The following table shows the most relevant child asset types of Data Assets.

Asset type	Description
Data Entity	A unit of data that can be classified and can have a stated relationship to other units of data. Examples: Customer, Employee
Data Attribute	A specification that defines a property of a data entity. Examples: Cus- tomerBirthDate, EmployeeFirstName
Data Set	A collection of related sets of Data Assets that are Data Elements or composed of Data Elements. Example: Customer contact information
Data Element	A unit of data that is defined for processing. It usually documents an aspect of something abstract. Examples: Person Birth Date, Person Address, Customer Account Number

Data Assets by domain

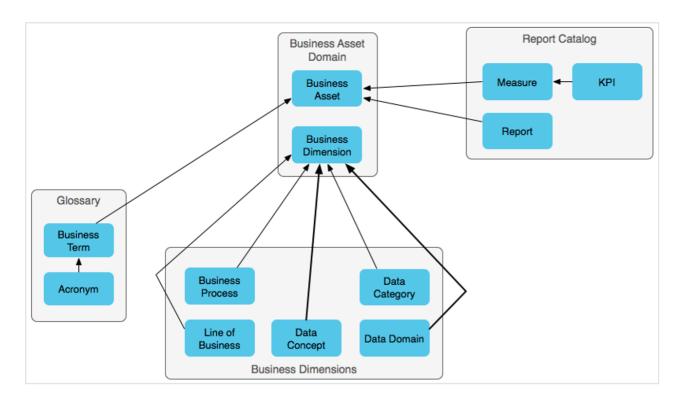


Business Assets

The following table shows the most relevant child asset types of Business Assets.

Asset type	Description
Party	An association, corporation, partnership, proprietorship, trust, or individual that has legal standing. A party has legal capacity to enter into agreements or contracts, assume obligations, incur and pay debts, sue and be sued, and to be held responsible for its actions.
Business Process	A set of activities and tasks that, once completed, produce a specific result and add value to the business. Examples: campaign management, talent recruitment and staffing.
Line of Business	Also known as a business unit or a business area, the line of business is a logical element or segment of an organization that serves a particular business need. Examples: asset management, retail, e-com, investment management.
Data Category	A data category is a grouping of information relating to an individual, be it their private, professional or public life. Data categories are not exclusive; information can transcend multiple categories.
Data Subject Category	A way in which a user can interact with data at rest, with manual intervention, to manipulate or consolidate data.
Jurisdiction	A hierarchical representation of how a business divides its market on the basis of geography, such as regions and countries. For example, North America is segmented into USA and Canada.

Business Assets by domain



Governance Assets

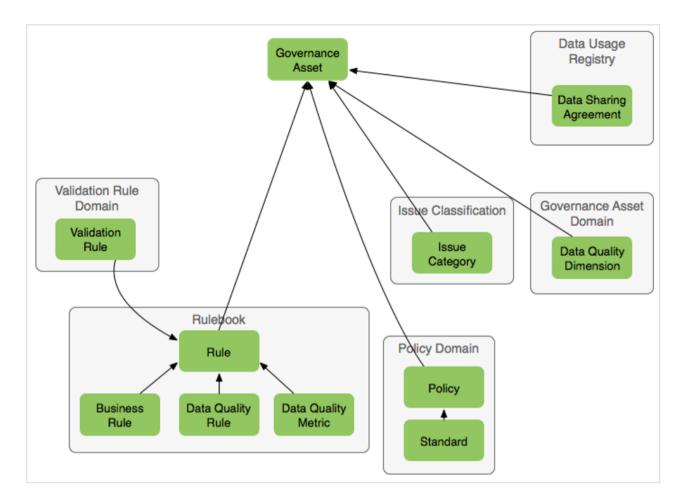
The following table shows the most relevant child asset types of Governance Assets.

Asset type	Description
Policy	A statement of intent that is implemented by a set of rules. Policies are usually set by a data governance council.
Standard	A specific low-level mandatory action or rule that helps to enforce and sup- port a policy. Example: All personal information must be encrypted with a spe- cific encryption type.
Regulation	A directive made and maintained by an authority. For example, BCBS and Solvency.
Purpose	An asset that describes the reason for which another asset is created or for which another asset exists.

Chapter 5

Asset type	Description
Legal Basis	The lawfulness of processing, as defined by Article 6 of GDPR. Personal data may be processed only if, and to the extent that, at least one legal basis applies. (Implicit for CCPA)
Assessment	A type of asset that is used to store the results of assessments as attributes and relations.
Safeguard	(GDPR) Safeguards for transfers of data and in particular Personal Information to third parties, other countries or international organizations.
Risk	An uncertain event that could create damage, injury, liability, loss or any other negative occurrence that is caused by external or internal vulnerabilities (Risk Sources), which can be avoided through controls.
Control	A measure taken to mitigate a risk. Any process, policy, device, practice, or other conditions and/or actions which maintain and/or modify risk.

Governance Assets by domain



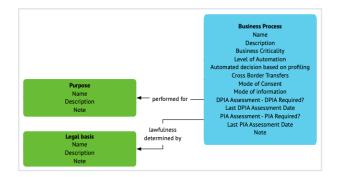
Issue Assets

The following table shows the most relevant child asset types of Issue Assets.

Asset type	Description
Security Issue	A security incident in which sensitive, protected or confidential data is copied, transmitted, viewed, stolen or used by an individual unauthorized to do so. Security issues can involve financial information, such as credit card or bank details; Personal Health Information (PHI); Personally Identifiable Information (PII); corporate trade secrets or intellectual property. Most security issues involve overexposed and vulnerable unstructured data, such as files, doc- uments and sensitive information.
Review Request	Asset that groups all triggers that ask for a review or update to another asset

Purpose and Legal Basis assets

To give context to the concepts of purposes and legal bases, we can say that an organization performs business processes for specific purposes, with lawfulness determined by certain legal bases.



Purpose assets

Purpose assets describe the reasons for which other assets are created or for which other assets exist, for example:

- Business purpose: The use of personal information for the operational purposes of a business or a service provider. Business purposes include:
 - Auditing
 - Detecting security incidents
 - Debugging
 - Short-term transient use
 - Performing services, for example, customer service, order fulfillment, or processing payments.
 - Internal research for technological development, or maintaining quality or safety of a device or service.
- Commercial purpose: To advance a person's commercial or economic interests, enabling or effecting, either directly or indirectly, a commercial transaction.

There are important legal implications for Purpose assets. For example, the definition of a Purpose asset might forbid you from accommodating a data subject's right to be forgotten.

The following image shows an example list of Purpose assets.

CCPA Business Purpose	Indicates that the processing happens for a purpose that is considered a business purpose under CCPA.
CCPA Commercial Purpose	Indicates that the processing happens for a purpose that is considered a commercial purpose under CCPA.
CCPA Other Purposes	Indicates other purposes foreseen by CCPA.

Note The Purpose assets you create will be available for selection when requesting access to data sets, during data shopping.

Warning

- Upon the request of a data subject, you must communicate the relevant purpose for using the data subject's personal information.
- You cannot use a data subject's personal information for any purposes other than that for which the personal information is collected.

Legal Basis assets

Legal Basis assets describe the lawfulness of business processes that produce and consume personal information. Personal information can be processed only if, and to the extent that, at least one legal basis applies.

The Legal Basis asset type has the following attributes and relations in the global assignment:

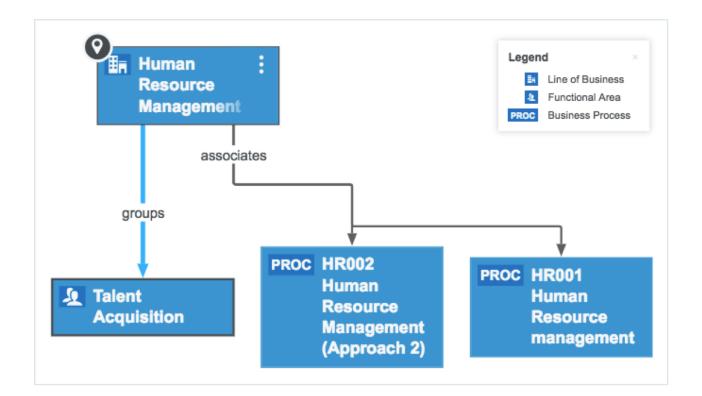
- Description
- Note
- Legal Basis determines lawfulness of Business Process.
- Legal Basis complies with / applies to Governance Asset

Line of Business asset type

The Line of Business asset type helps you document your business units or business areas that serve a particular business need.

The following image shows an example of how the Line of Business asset Human Resource Management is related to Business Process assets for which it is responsible.

Chapter 5



Tip We recommend that you first onboard the various lines of business, and then question the relevant stakeholders to map the lines of business to the business processes they follow. This helps to ensure completeness of the process register.

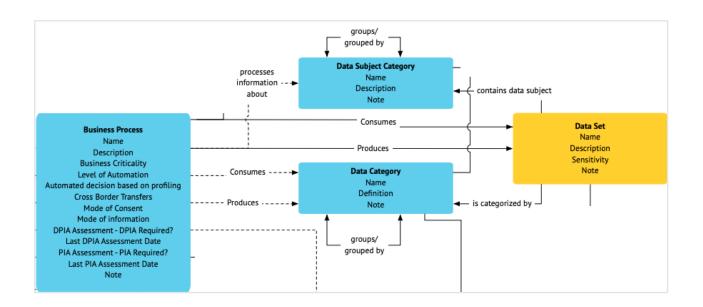
Data Categories

Data Categories allow Privacy Stewards to classify data, specifically as it concerns its level of sensitivity, value and criticality. They help determine privacy and security controls for the protection of the data.

Asset type	Description
Data Cat- egory	A classification of personal data elements that is managed by the Privacy team.
	Examples:
	Biometric dataFinancial dataPayment card information

Data categories are important, as they can determine the need for compliance with a specific regulation. For example, a data category that identifies personal health information would be exempt from CCPA because such information is covered under HIPAA.

Note The Data Privacy custom asset pages require relations between the relevant Data Set and Data Category assets.



Data Subject Category

Asset type Description

Data SubjectA classification of data subjects relevant to an organization. Can be used to categorizeCategorybusiness-specific and regulation-specific categories.

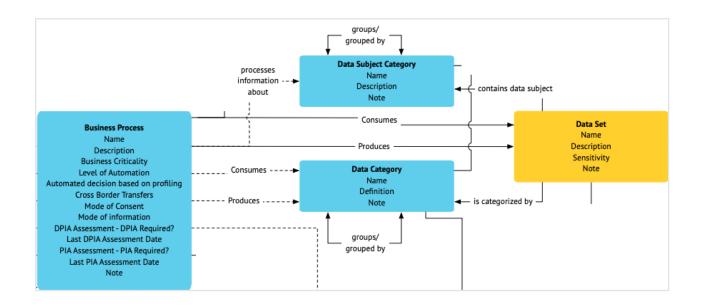
Examples:

- Employees
- Customers
- Suppliers

Data subject categories are important, as they can determine the need for compliance with a specific regulation. For example:

 A data subject category that identifies employees would be exempt from CCPA until Jan 2021. **Note** The Data Privacy custom asset pages require relations between the relevant:

• Data Set and Data Subject Category assets.



Regulation asset type and assets

Data Privacy comes with two Regulation assets:

- CCPA
- GDPR

These assets are related to other assets, to fulfill the requirements of out-of-the-box custom asset pages. For example, every Business Process asset should be related to one or both of the assets, CCPA and GDPR, to allow the relevant custom Business Process asset page to be shown.

Warning For these reasons, it is important that you not delete the Regulation assets CCPA and GDPR.

Retention policies

Retention policies are Standard assets that determine how long you can retain different types of data. When a specific retention period expires, the relevant information must be deleted.

Note The out-of-the-box retention policies are merely examples. Determine the retention periods that apply to the data across your organization and create Standards.

Safeguards

Safeguards are data protection guarantees for cross-border transfers of personal data. They are intended to guarantee the protection of personal data sent to recipients in countries for which data protection regulations are deemed inadequate.

You can use the Safeguard asset type to represent your safeguards.

When onboarding business processes, you can create relations between your safeguards and the relevant business processes that involve cross-border transfers of personal data.

Tip Review the out-of-the-box Sample safeguard register domain.

- 1. Review the out-of-the-box Sample safeguard register domain.
- 2. In the global assignment of the Safeguard asset type, ensure that the configured attributes meet your needs.
- 3. Create new Safeguard assets, as necessary.

Standards

Standards classify data based on their level of sensitivity and organizational impact, were the data disclosed, altered, or destroyed without authorization. They are mandatory actions or rules that help to enforce and support policies.

Examples:

- Public
 You might use such a standard to classify your least sensitive data.
- Private

• Restricted

You might use such a standard to classify your most sensitive data.

Name †	Asset Type
Data Classification Policy	Policy
Private Data	Standard
Public Data	Standard
Restricted Data	Standard
HIPAA	Policy
Privacy Notice	Policy
Privacy Notice Consumer	Policy
Retention Policy	Policy
End date contract + 2 years	Standard
End date contract + 5 years	Standard
Year created +2 years	Standard

Key relationships

Head	Asset type assigned as head	Role	Co-role	Tail	Asset type assigned as tail
Governance Asset	Policy	groups	is included in	Governance Asset	Standard
Governance Asset	Standard	applies to	complies to	Governance Asset	Data Quality Dimension

Jurisdiction

Jurisdiction assets provide a hierarchical representation of how an organization divides its market on the basis of geography, such as regions and countries. For example, USA and Canada can be jurisdictions located in the jurisdiction North America.

Jurisdiction assets are important for identifying:

- The flow of personal data.
- Local privacy regulations.

- Where:
 - Technology assets are hosted.
 - Personal data is hosted.
 - Personal data is processed, as defined by a data sharing agreement.
 - ° Data subjects affected by security issues reside.

Tip The out-of-the-box domain "Countries and states" includes Jurisdiction assets for the countries of the world, the 50 United States and more.

Processing Categories

Processing category assets categorize data processing activities according to the actions taken during the process.

Examples:

- Retrieval
- Storage
- Erasure or destruction
- Archiving

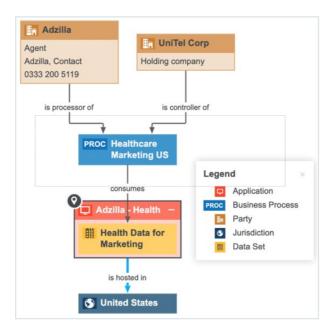
Keep in mind the following important points when considering Processing Category assets:

- For business processes that rely on data subject consent as the legal basis for processing personal data, consent must be obtained at the moment the data is collected or recorded.
- Processing categories must align with the specified purposes for processing personal data. For example, if your purpose for carrying out a business process is to sell personal information, the related processing category must be Disclosure or Dissemination.
- Processing categories represent the different processes deployed in the lifecycle of data. As such, they also play a role in pure data lifecycle management and risk management.
- Risk and privacy regulations do not apply to all processing categories in the same way. For example, GDPR applies differently to data archiving processes.

Applications and key mappings

It's important to maintain an inventory of the applications, across your organization, that consume and produce data. With a complete application inventory, you can map your applications to the personal data consumed and processed by each application, and set the security level for each application. With additional mapping, you can identify:

- In which Technology Assets your personal data resides, and the security level of these assets.
- By which applications your personal data is being consumed and produced.
- In which jurisdiction your personal data is being hosted.
- Which risks and security issues could impact your applications.



Tip

- 1. Identify the applications across your organization that consume or produce personal information.
- 2. Create new Application assets as necessary.
- 3. Analyze the out-of-the-box attributes configured in the global assignment for the Application asset type, and add any attributes you might want.

Note Be sure to add the Security Level attribute to the Technology Asset global assignment. This attribute is essential for identifying the security level of the Technology Assets that host personal data and the Application assets that consume or produce personal information, those that could be potentially impacted by risks, and so on.

Privacy and data classification policies

To fill out your personal information assets with the necessary relations and attributes, your Privacy team has to first create a data classification policy and related standards, data categories, and data attributes. Your Governance team can then map these privacy policy-defining assets to the physical data layer, meaning your System, Table, and Column assets, to inherit the sensitivity characteristics, as defined by your Privacy team.

The following table describes the four privacy policy-defining asset types that are the focus of your Privacy team.

Asset type

Policy	A statement of intent that is set by a council and is implemented by a set of standards. In this context, the policy determines how personal information across the organization is classified.
	Helps an organization determine the minimum privacy and risk controls, to mitigate privacy risk.

Asset type

Standard	Standards classify data based on their level of sensitivity and organizational impact, were the data disclosed, altered, or destroyed without authorization. They are mandatory actions or rules that help to enforce and support policies.						
	Examples:						
	 Public You might use such a standard to classify your least sensitive data. Private Restricted You might use such a standard to classify your most sensitive data. 						
Data Cat- egory	A classification of personal data elements that is managed by the Privacy team. Examples:						
	Biometric dataFinancial dataPayment card information						
Data Attrib-	A specification that defines a property of a data asset.						
ute	For example, the data category Payment Card Information might contain, in part, the following data attributes:						
	Credit card numberCardholder nameSecurity code						

Example: Lineage of a data classification policy and related standards, data categories and data attributes

Note The images in this example show the classic user interface. You can still refer to them to understand the concept.

Suppose that your Privacy team has decided to distinguish all data across the organization with one of three "labels," or standards, based on different levels of sensitivity.

With such decisions made, a Privacy Steward creates:

1. A Policy asset named Data Classification Policy, to fully describe all such decisions and details.

- 2. Three Standard assets: one named Public, to distinguish your least sensitive data; one named Private; and one named Restricted, to distinguish your most sensitive data.
- 3. A relation that groups the three Standard assets under the Data Classification Policy asset.

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	Tags Com	ments		Data classification, in the context of privacy by design, is the classification of data based on its level of sensitivity and the organisation impact in case the data would be disclosed, altered or destroyed without authorization. Data Classification helps us determine the minimum privacy & security controls to mitigate privacy risks.																										
				Justification 🖲																										
0,0	Diag	gram		The purpose of this Guideline is to establish a framework for classifying the organisations data based on its level of sensitivity, value and criticality to the organisation. This is done in order to comply with the organisation's information privacy & security standards. Classification of data will aid in determining baseline privacy & security controls to mitigate privacy risks.																										
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The Privacy steward then creates:

- Data Category assets, which help you to segregate all data across your organization according to subject matter.
- Relations, such that one of the Standards applies to each of the Data Category assets.

The following image shows which data categories have been deemed restricted.

Restricted Type: Standard	Data Status: Accepted Add Relationship Appro		the Expert Copy Asset Processing Activit	ty Wizard Sim	ple Approval Vote Vote (P		Delete Auto hyperlinks	80%	
Id characteristic < Overview Tags Comments	Description Data is classified as restricted when unauthorized Note Empty value	disclosure, al	teration or destruction results in significant risk t	o the organisation	and its data subjects. It requires th	ne highest level of access contr	ol and security protections whether in storag	e or in transit	
Diagram Pictures	applies to Asset						Sort by 🕈 Name 💌	Add	
Responsibilities	먼 Data categories	Ť	Data categories	Ŷ	Data categories DCAT Claim information	1	Data categories Contract information		
References History Files	Data categories	es		ŵ	Data categories DCAT Data on sex life or sexual orientation		Data categories CCAT Estate information		
Hies	Data categories CCAT Financial information			¥	Data categories	Ť	Data categories		
	한 Data categories	Ť	업 Data categories	¥	Data categories	₩ formation	Data categories CAT Loan information		
	Data categories	Ŧ	업 Data categories	¥	 Data categories DCAT Online activity 	Ť	Data categories CAT Payment Card Informatio	n	
	업 Data categories	Ť	업 Data categories	¥	🗄 Data categories	Ť	업 Data categories		

Each Data Category asset, for example, Payment Card Information, contains data attributes that are specific to payment card information, for example, Cardholder Name and Credit Card Number. The following image shows the relations between the Data Category asset and the Data Attribute assets.

117				Create	C Search	0 tasks	- 52	2 M
60		Data categories						
Ľ		Card Information gory ① Status: Candidate Add Relationship Approv	al Ask the Expert Copy Asset Processing Activity Wizard	Simple Approval Vote	Vote (Privacy) Edit Mo	ove Delete Auto hyperlinks		
A	dd characteristic	No data available						
ß	Overview	Processing allowed by Data Sharing Agreement						Add
	Tags	No data available						
L	Comments	complies to Governance Asset				Sort by 🕇 Name 👻	Ad	d 🔢
0,0	Diagram	🗄 Corporate data policies 🖀	던 Corporate data policies 👕					
2	Pictures	STD PCI Data Security Standard	STD Restricted Data					
29 90	Responsibilities References	Description The Payment Card Industry Data Security Standard is an information security standard for organizations that schemes. The PCI Standard is mandated by the card schemes. The PCI St						
0	History	Security Standards Council.						
Ø	Files							2
		contains Data Attribute				Sort by 🕇 Name 👻	Ad	d 🔢
		ত Logical Data Models 🝵	🗄 Logical Data Models 🖀	업 Logical Data Models	. *	껍 Logical Data Models		¥
		DATT Bank Account Number	DATT Cardholder Name	DATT Credit Card Number	r ^a r	DATT Credit Card Number		
		Data Entity Customer	Data Entity Customer	Data Entity Employee		Data Entity Counterparty		
		🗇 Logical Data Models 🛛 🖀	🗄 Logical Data Models 🖀					
		DATT Credit Card Number	DATT Security Code					
		Data Entity Customer	Data Entity Customer					

The Governance team can then map these privacy policy-defining assets to the physical data layer, meaning your systems, tables, and columns.

Security attribute for System assets

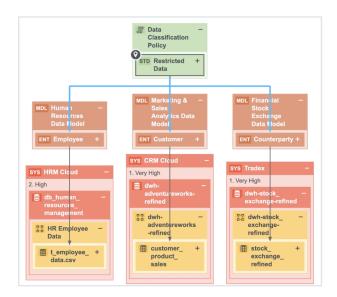
Your Governance team will map your Table assets and Column assets to the System assets that produce and consume data, so that you can quickly see in which systems PI is being used. Your InfoSec Stewards can add a security level attribute to the System assets, so that you can see whether or not your systems have the required level of security (this is an attribute of the system asset).

View a diagram of the mapping

The following image shows a lineage diagram after mapping privacy policy-defining assets to the physical data layer.

Here we can identify:

- All the systems in which restricted data is stored, specifically HRM Cloud, CRM Cloud, and Tradex.
- Whose restricted data is being stored, specifically Employee, Customer, and Counterparty data.
- The security level of each system, for example, "Very High" for the System assets CRM Cloud and Tradex.



Discovery

Discover and capture information related to personal information, business processes, thirdparties, data sharing agreements and contracts.

Personal information discovery

To protect your personal information, you first need to identify it and appropriately classify it.

It is important to know:

- Where your data is stored.
 This is critical to helping you respond to individual rights requests, such as a request to be forgotten. To respond appropriately, you need to be able to quickly know where personal information exists across your organization.
- Why you are storing the data, meaning the business and legal context.
 Generally speaking, you should not store data that is not critical to your business processes. However, some personal information needs to be kept to comply with legal obligations. Consider, for example, an individual's request to be forgotten. With this request, the individual's personal information will have to be deleted from most systems, but it cannot be deleted if it is needed to comply with a legal obligation.

Tip Follow our course Discover Your Sensitive Personal Information on Collibra University.

How Collibra helps you discover your personal information

Your Privacy team first has to create a data class policy and standards, data categories, and data attributes. Your Governance team then takes over, mapping these privacy policy-defining

assets to your personal information assets, thereby endowing them with all the required attributes and relations. This mapping is aided greatly by Automatic Data Classification. Data Privacy is integrated with Catalog, allowing you to leverage Catalog's Automatic Data Classification capabilities to discover and classify your personal information.

Furthermore, after classifying a single column from a table, you can then simultaneously associate that column and all the other columns in the table with a particular data domain. This is made possible by Guided Stewardship.

Automatic Data Classification for discovery

Data intelligence goes beyond just adding a data source to the Data Catalog. To get the most out of it, you need to classify data and connect it to other nodes in the Data Intelligence knowledge graph.

Data Classification helps you understand the types of data you have and where it's located. By assigning a data class, such as name, phone number, or web browser to Column assets, you add context to your data.

For complete information, see About data classification.

Business process discovery

Business process discovery helps you to:

- Identify and capture your business processes that produce or consume personal information.
- Maintain complete Process Register domains.

Requesting input to a Process Register domain

As the Business Steward, Privacy Steward, or Data Protection Officer for a Process Register domain, you can invite business users to participate in the development of the domain by reviewing any existing Business Process assets in the domain and proposing any business processes that do not yet exist as assets.

The **Request input** button, which is available in a Process Register domain, triggers the Invite to Business Process Register workflow. The workflow includes a form that can be used to write an invitation email and select recipients.

The form contains:

- A default set of email recipients, which includes all the users that have the Subject Matter Expert responsibility for the domain.
- A default message, which you can edit and format as needed.

The following image shows an example of an invitation email.

Data Privacy	07/10/2019					
Invitation to propose business processes						
To comply with privacy legislation, it is required to document all the business processes of your department. Please click the link below to go to the Sample IT processes domain, and verify that all your business processes are documented. If you notice any missing processes, you are encouraged to add them.						
Go to Sample IT processes						

The button in the invitation email opens the Process Register domain from which the email was triggered.

Request input

You can send an email to specific users, requesting their participation in the development of a Process Register domain.

Steps

- 1. Go to the relevant Process Register domain page.
- 2. On the Actions menu, click Request input.

» The Invite to Business Process Register workflow is started, and the **Request to** review sidebar is shown.

Tip If the Request to review sidebar is not shown, click the Tasks icon text to the Actions menu (<).

3. In the Request to review sidebar, enter the required information.

Field	Description
Select business users	The users to whom you want to send the email invitation.
Message	The body of the email.
	You can retain the default text or edit it as needed.

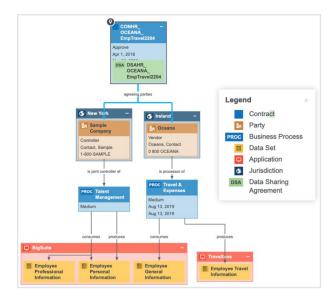
- 4. Click Send.
 - » The email invitation is sent to the selected users.

Third-party register

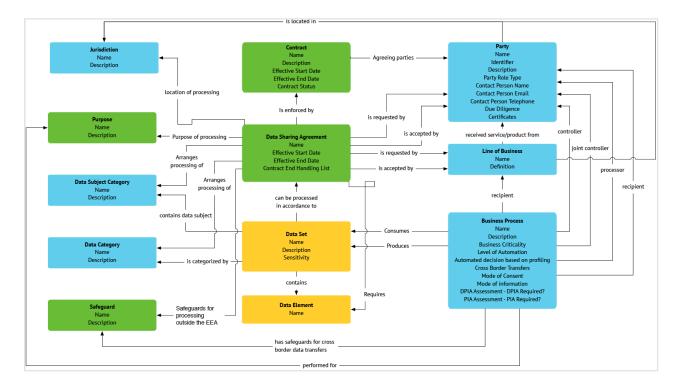
With an increasing number of personal data breaches traced back to third-parties, organizations are urged to implement or strengthen their privacy programs with regard to their vendor relationships. By mapping your business processes to your vendor management life cycle, you can begin to build a program that protects your data, customers, and reputation from risks introduced by third-parties.

We recommend that you create a third-party register domain, to store all the third-party privacy profiles specific to the community.

Note In Data Privacy, all your third-parties are represented by Party assets. These Party assets are distinguished, in part, by the attribute Party Role Type. Example out-of-the-box Party Role Types include Business Partner, Controller, Distributor, Processor, Reseller and Subsidiary.



Asset model



Third-Party Privacy Profile

The Third-Party Privacy Profile enables you to:

- Create a profile record that includes relevant privacy information about your thirdparties.
- Organize all the necessary information about the third-party, be it a vendor, supplier or other, in a single record, to provide the Data Protection Officer relevant third-party information, such as the contract in place, terms and conditions, data that is being shared, risk profile and more.

The information contained in the Third-Party Privacy Profile should help answer the following questions:

- What services does the third-party provide?
- How essential are these services to your organization?
- What will be the duration of the relationship with this third-party?
- What kind of data will the third-party have access to? Will the third-party store any of this data, and if so, how much?
- To which internal systems and applications will the third-party require access?
- What would the business impact be if there was a breach or the data was compromised through a third-party breach?
- Can you use the answers to these questions to assign a vendor a risk score of high, medium, or low?

Building blocks

Third-Party Privacy Profiles are composed of five major building blocks, each aimed at documenting specific information about third-parties.

Building block	Description
General	Provides basic information about the third-party, such as the type (for example, a vendor, contractor or government organization), where the third-party is located and who the contact person is.
Privacy	A due diligence, focused on privacy matters, to consider the third-party's repu- tation, experience, history of incidents, and corporate policies and procedures, par- ticularly as they relate to data security and privacy.

Building block	Description
Contract	Information on the legal agreement between the third-party and the organization, to understand what is in scope, when the contract begins and ends, what the status of the relationship is, and to which internal business the product or service is being provided.
Service	It's important to consider how each third-party will interact with your data. Will they be collecting, assessing, processing, transmitting, or storing your data? This inform- ation is provided here, including where it is hosted, what data agreements are in place, what type of private data is involved, and so forth. Such information helps your organization evaluate the potential privacy and security risks that could arise if you engage with the third-party.
Risk	Creating a comprehensive risk profile for each vendor allows you to determine the level of risk to your organization, by measuring the probability or likelihood of risk against the severity of the consequence. The Third-Party Privacy Profile can help your organization determine whether your third parties are low risk or high risk, so you have a system that enables you to prioritize vendor risk appropriately and develop a targeted strategy to address these risks.

Creating third-party profiles

There are two methods for the initial creation of third-party privacy profiles:

- Via the Collibra APIs that allow Data Privacy to communicate with your organization's applications, to retrieve information about your third-parties, for example, your vendor management system. For complete information, contact your Collibra Professional Services representative.
- Via import, using the Microsoft Excel template available on the Collibra Downloads page.

The resulting assets are Party assets. After the assets are created, the Privacy Steward can edit them to include all necessary privacy information that is missing.

Note Each of these methods is designed to help you with the initial creation of your third-party profiles. After the initial creation via API or import:

- Any edits to these Party assets should be made by the Privacy Steward, directly via the relevant asset page.
- Additional Party assets should be created via the global Create button.

Basic and full import template

The Microsoft Excel template comes with two spreadsheets:

- A Basic spreadsheet, which enables you to import all your third-party general information. The Privacy Steward can then add the rest of the building block information after the assets are created.
- A Full spreadsheet, which allows you to map all the information about your third-parties in a single import file. This is useful if the information is maintained in various systems throughout your organization.

Note The template is available on the Collibra Downloads page. You can use the same template for GDPR and CCPA.

Status evolution

Condition	Status of the asset
When a third party profile is created by the API or import	Is Candidate
When the required information, as defined by the Privacy Office, is complete	Becomes Approved
When the business relation between your organ- ization and the third-party has ended	Becomes Obsolete

Third-party contracts

Contract assets represent the contracts you have in place and that govern the relationships you have with your third parties. The global assignment for the Contract asset type includes a relationship type that allows you to map your contracts to their relevant data sharing agreements.

Tip If you have contracts in place with your third parties but you haven't yet established data sharing agreements with them, you can:

- 1. Create Contract assets to represent the contracts you have in place with your third parties.
- 2. Create your new Data Sharing Agreement assets.
- 3. Map your Contract assets to the Data Sharing Assets that they enforce.

Third-Party Privacy Profile views

The out-of-the-box Third-Party Privacy Profile domain comes with two views:

- The Default view, which provides information about all the required attributes in the thirdparty privacy profile. This view is also used to import content for the first time.
- Third-Party Profile Privacy view, which shows key information about a third-party. There is a single record for each third-party, which includes all of the information about each building block.

Data sharing agreements and contracts

When a Controller engages the services of a Processor, the relationship and activities must be governed by a written contract. The contract is binding on the Processor, with regard to the Controller, and helps both parties understand their responsibilities and liabilities.

Warning Controllers are liable for their compliance with relevant laws and regulations. Furthermore, they must only appoint Processors that can provide sufficient guarantees that such legal requirements are met and the rights of data subjects protected. Processors are expressly obliged to comply with certain laws and can be fined or sanctioned for non-compliance.

Contractual obligations

The contract dictates, at a minimum, the following obligations toward the Processor:

- Act only on the written instructions of the Controller.
- Ensure that the people processing the data are subject to a duty of confidence.
- Take appropriate measures to ensure the security of processing.
- Engage sub-processors only with the prior consent of the Controller, and under a written contract.
- Assist the Controller in providing data subjects with access to their data and allowing data subjects to exercise their rights as defined by the relevant regulation.
- Assist the Controller in meeting its obligations in relation to:
 - The security of the business process.
 - The notification of personal data breaches.
 - Data protection impact assessments.
- Delete or return all personal data to the Controller, as requested, at the end of the contract.
- Submit to audits and inspections.
- Provide the Controller with any information it needs to ensure that both parties are meeting their respective obligations.
- Tell the Controller immediately if it is asked to do something that infringes upon the laws of the relevant jurisdiction.

Data Sharing Agreement workflow

The successful result of this workflow is an approved Data Sharing Agreement asset. Data Sharing Agreement assets are used to document the details of the contracts between Controllers and Processors.

The following attributes are essential to Data Sharing Agreement assets:

- The data processed.
- The data subject categories processed.
- The start date and end date of the contract.
- The location of processing.
- How data is handled at the end of the contract.
- The purpose of the processing.
- The safeguards in place for protecting the data in the case of cross-border transfers.

Relevant roles

Action	Role
Start the workflow.	Any user.
Review the asset.	Data Steward.
Approve or reject the asset.	The Owner for the domain in which the Data Shar- ing Agreement asset is created and stored.

Chapter 7

Governance

Organize and govern your data with the help of:

- Workflows.
- · Asset onboarding and change management processes.
- Reporting and process monitoring.

Process Register domains

The Process Register domain type enables you to create domains for:

- Storing your Business Process assets.
- Mapping your Business Process assets to the data consumed and produced by those processes.

Maintaining complete Process Register domains helps organizations to:

- Comply with data transparency requirements.
- Respond to consumer access requests and other consumer rights.
- Manage security and prevent data breaches.
- Manage Service Level Agreements with third parties.
- Leverage investments made to comply with a specific regulation, for other use cases, such as compliance with another data privacy regulation or data catalog use cases.

Note As advised in the Setting up your community-domain structure section, we strongly recommend that you create a Process Register domain for each of your communities and subcommunities.

Default view

Process Register domains come with a default view that shows a hierarchy of:

- Business Process assets.
- Data Set assets that are consumed or produced by these assets.

A collaborative hub for developing your assets

Process Register domains also serve as a hub from which to collaborate in the development of your Business Process assets. In every Process Register domain, there is a button that allows users to request input to help develop the Process Register domain.

Sample Process Register domains

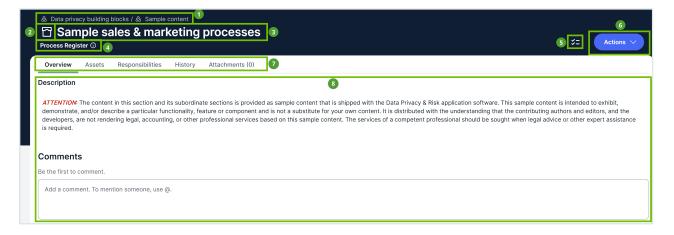
Data Privacy comes with the following out-of-the-box sample Process Register domains:

- Sample legal & audit processes
- Sample sales & marketing processes
- Sample information technology processes
- Sample human resources processes

These domains include sample Business Process assets to give you a head-start in identifying your business processes, their characteristics, and related elements. You can edit these assets, move them to other Process Register domains, and invite Business Stewards, Data Stewards, and Privacy Stewards to further develop them.

Process Register domain page overview

The domain page provides a complete overview of all information related to a domain.



Number	Description
1	Navigation path of the current domain.
2	The icon or abbreviation of the domain's type.
3	The name of the domain.
4	The type of the domain.
5	Open tasks for the domain.
6	Actions you can take on the domain, for example, requesting input, editing, moving, or deleting.
7	Tabs to navigate to other pages of the domain and add characteristics.
	 Overview: Description of the domain and comments. Assets: Assets in the domain. Responsibilities: View permissions and responsibilities of the domain. History: Changes made to the domain, including the names of the users who made the changes, along with the timestamp. Attachments: Attachments related to the domain.
8	The currently selected page, in this case the Overview page, contains all of the attributes that have been defined for the domain.

Business Process asset type

Business Processes are a set of activities and tasks that, once completed, produce a specific result and added value to the business. They are useful because they allow your organization to abide by the requirements of the General Data Protection Regulation (GDPR) and to keep records of processing activities.

Business Process assets represent the business processes in your organization. For example, Human Resources is a business process that groups the business processes Payroll, Benefits, and Talent Acquisition.

The onboarding of Business Process assets follows the asset onboarding process.

Warning Collibra isn't compatible with third-party ad-blocker browser applications. Business Process asset pages and Process Register domain pages, specifically, won't load if you have an ad blocker installed.

Related topic

Privacy regulation in Business Process assets

Workflows

Workflows are a key feature of Data Privacy. They automate processes and ensure collaboration among key stakeholders in your organization. The data privacy workflows allow you to fast-track your compliance efforts, by guiding users through the creation, approval, and maintenance of assets.

Workflows are presented in wizard format, a sequence of dialog boxes, or forms, that prompt users to enter information.

Given certain limitations on the permissions of some data privacy-related roles, Data Privacy does not prevent users from editing an asset directly from the asset page. However, the asset onboarding and change management workflows include steps for the review, feedback, and approval of assets. This holistic approach helps to ensure the quality and trustworthiness of your data. As such, we strongly recommend that users use the prescribed workflows for creating and modifying assets.

Warning

- To interact with workflows, users must have a global role with the following global permissions:
 - Start workflow to start workflows.
 - Participate in workflow to receive and complete workflow tasks.

Note Users that have a global role with the **Workflow Administration** or **System administration** permission do not require these permissions explicitly.

- If you want to customize an out-of-the-box workflow, you should make a copy of the workflow, rename the copy, make your changes, and then deploy it. This ensures that your customizations are not overridden if we need to update the out-of-the-box workflows.
- Data Privacy comes with workflows for approving data privacy-specific assets. The Collibra Platform out-of-the-box approval workflows (Approval Process, Asset Approval Process, and Simple Approval Process) should not be used to approve data privacy-specific assets. As such, ensure that your Collibra approval workflows are not associated with data privacy-specific asset types.
- For information about how to associate a workflow with specific asset types, go to View and edit workflow definition settings.
- Workflows are predefined to run an out-of-the-box data privacy configuration. Therefore, if you have customized the data privacy asset model, you must reconcile your changes with the data privacy workflows.
- You can replace some of the out-of-the-box workflows with your customized workflows. You must ensure, however, that your workflows follow the same asset status evolution as that followed by the out-of-the-box workflows. For example, you can use a customized ownership acceptance workflow, as long as the asset status becomes Ownership accepted when the proposed target domain has been accepted.

Tip For complete information about workflows, go to Getting started with workflows in the Collibra Developer Portal.

Out-of-the-box Data Privacy workflows

The following table shows the out-of-the-box workflows that are specific to Data Privacy.

Workflow	Applicable regulation	Description
Approval	CCPA, GDPR	Automates the approval of an asset. Includes a step that enables Stakeholders to provide feedback before the actual approval.
Business Process Wizard	CCPA, GDPR	Enables users to create and edit the attributes of a Business Process asset, and launches other workflows that allow you to create and update attributes of a Business Process asset.

Workflow	Applicable regulation	Description
Business Process CCPA Wizard	CCPA	Enables users to provide the relevant attributes of a Business Process asset, specifically for compliance with CCPA. This workflow is started during the Business Process onboarding process, after the relation between the Business Process asset and the CCPA Regulation asset is established.
Business Process GDPR Wizard	GDPR	Enables users to provide the relevant attributes of a Business Pro- cess asset, specifically for compliance with GDPR. This workflow is started during the Business Process onboarding process, after the relation between the Business Process asset and the GDPR Regulation asset is established.
Business Process General Wizard	CCPA, GDPR	Enables users to create and update a subset of attributes of a Busi- ness Process asset. It is used in both the asset proposal and char- acteristics management phase of the asset onboarding process.
Data Set Wizard	CCPA, GDPR	Contains a set of wizard-style forms used in the New Data Set workflow.
Data Sharing Agreement Wiz- ard	CCPA, GDPR	Contains a set of wizard-style forms used in the New Data Sharing Agreement workflow.
Govern Asset	CCPA, GDPR	Acts as the main dispatcher workflow to guide users through the completion, ownership acceptance, and approval of an asset.
Govern Asset Launcher	CCPA, GDPR	Starts the Govern Asset workflow.
Informed Domain Selection (Sub Process)	CCPA, GDPR	Enables users to select a domain, and is used as a building block in other workflows.
Invite to Business Process Register	CCPA, GDPR	Invites business users to contribute to the development of Process Register domains.
Launch governance workflow on business process	CCPA, GDPR	Starts the governance workflow on a Business Process asset. It can be used by external applications to trigger the asset governance workflow, while managing the configuration in Collibra.

Chapter 7

Workflow	Applicable regulation	Description
Log Potential Security Breach	CCPA, GDPR	Enables users to log a potential security breach.
Manual Review Request	CCPA, GDPR	Enables users to request a review of an asset. The workflow creates a Review Request asset, which prompts the Business Steward for the target asset to review the content of the target asset.
Manual Review Request CCPA	CCPA	Enables users to request a review of a CCPA-specific asset. The workflow creates a Review Request asset, which prompts the Business Steward for the target asset to review the content of the target asset.
Manual Review Request GDPR	GDPR	Enables users to request a review of a GDPR-specific asset. The workflow creates a Review Request asset, which prompts the Business Steward for the target asset to review the content of the target asset.
New Business Process	CCPA, GDPR	Starts the creation, ownership acceptance, and initial approval of a Business Process asset.
New Data Set	CCPA, GDPR	Starts the creation, ownership acceptance and initial approval of a Data Set asset.
New Data Sharing Agreement	CCPA, GDPR	Starts the creation, ownership acceptance, and initial approval of a Data Sharing Agreement asset.
New Remediation Action	CCPA, GDPR	Starts the creation, ownership acceptance, and initial approval of a Remediation Action asset.
New Remediation Plan	CCPA, GDPR	Starts the creation, ownership acceptance, and initial approval of a Remediation Plan asset.
New Risk	CCPA, GDPR	Starts the creation, ownership acceptance, and initial approval of a Risk asset.
New Technology	CCPA, GDPR	Starts the creation, ownership acceptance, and initial approval of a Technology asset.

Workflow	Applicable regulation	Description
Ownership Acceptance (Sub Process)	CCPA, GDPR	Enables the acceptance of ownership of an asset. It includes a step in which stakeholders can provide feedback before the actual approval.
Propose Ownership	CCPA, GDPR	Enables users to propose ownership of a newly created asset.
Remediation Action Wizard	CCPA, GDPR	Enables users to create and update the characteristics of a Remediation Action asset.
Remediation Plan Wizard	CCPA, GDPR	Enables users to create and update the characteristics of a Remediation Plan asset.
Request Assets Access	CCPA, GDPR	Enables users to request access to assets that were added to the Data Basket. The Owners for the relevant assets receive a task to approve the access request.
Review Request Handler	CCPA, GDPR	Prompts Business Stewards to review the details of a Review Request asset and accept or reject the asset.
Review request handler (sub pro- cess)	CCPA, GDPR	Informs the Review Request Handler workflow that the changes have been made to an asset.
Risk Wizard	CCPA, GDPR	Enables users to create and update the characteristics of a Risk asset.
Security Breach Management	CCPA, GDPR	Enables the management of a security breach. It assigns an Issue Manager, who collects the information necessary to respond.
Technology Wiz- ard	CCPA, GDPR	Enables users to create and update the characteristics of a Tech- nology asset.
Time based asset review	CCPA, GDPR	Monitors Time-Based Review Rule assets and creates Review Request assets when triggered.
Update asset directly	CCPA, GDPR	Enables Business Stewards to start the asset change management process, without creating Review Request assets, assigning tasks to themselves to approve, or triggering the Review Request Handler workflow.

Workflow	Applicable regulation	Description
Voting Sub Process (Privacy)	CCPA, GDPR	A sub-process that determines how voting is handled in other processes. It is configurable and is not intended to be used as a standalone workflow.

Default domains

Some of the Data Privacy workflows result in the creation of new assets. The following table shows the default domains in which the new assets are created.

Note The default domains listed in the following table are used to only temporarily store the assets. The assets are ultimately moved to the domains specified when creating the assets.

Asset type	Default domain	Community
Business Process	New Processes	Data Governance Council
Data Set	New Data Sets	Data Governance Council
Data Sharing Agreement	New Governance Assets	Data Governance Council
Remediation Action	New Governance Assets	Data Governance Council
Remediation Plan	New Governance Assets	Data Governance Council
Risk	New Governance Assets	Data Governance Council
Security Issue	New Data Issues	Data Governance Council
Technology	New Applications	Data Governance Council

Note The concept of a default domain is not applicable to the following assets:

- Assessment, Time-based Review Rule, and Event-based Review Rule assets. These are created in the domain of the user's choice during the relevant workflow.
- Review Request assets. These are created in a hidden domain in the community of the related asset. You can view all the assets in these hidden domains through the Data Helpdesk.

Specify a domain for the creation of new assets

Assets created via the Data Privacy workflows are created in default domains. You can specify a different domain for the creation of such assets.

Warning It is critical that you do not delete any of the default domains without specifying new domains. Without specified domains, the Data Privacy workflows will not run.

Requirements and permissions

You have a global role with the **Workflow Administration** or the **System administration** global permission, for example Sysadmin.

Steps

- 1. On the main toolbar, click \rightarrow **Settings**.
 - » The Settings page opens.
- 2. Click Workflows.
 - » The Workflows settings page appears on the Definitions tab page.
- 3. Click the relevant workflow, for example, the Business Process Wizard workflow, which creates Business Process assets.
- 4. In the Variables section, click .
 - » The Variables dialog box appears.
- 5. Scroll down to the following variable: Please provide the ID of the default domain for a new Business Process.

- 6. Enter the UUID of the new default domain.
- 7. Click Submit.

Easy Business Process Proposal option

A well-develop Business Process asset has all the necessary characteristics, from the business, data-mapping and legal perspectives. Developing such an asset requires the specialized knowledge of Business Stewards, Data Stewards and Privacy Stewards.

The Easy Business Process Proposal option is designed to:

- Help Data Privacy users who identify the need for new assets, but might be deterred from proposing them due to all the business, data-mapping and legal considerations brought forth during the asset proposal phase, which are likely beyond the users' areas of expertise.
- Encourage the proposal of new assets, by:
 - ° Simplifying the Business Process asset proposal workflow for the user.
 - Automatically deferring specialized considerations to the relevant subject matter experts, to be addressed during the characteristics management phase.

Details

Enabled/Disabled	Description	
Enabled	All workflow forms that address data mapping and legal considerations are skipped in the asset proposal phase. These forms are presented to the Business Steward, Data Steward and Privacy Steward during the characteristics management phase of the onboarding process.	
Disabled	All workflow forms, including those that address data mapping and legal considerations, are included in the asset proposal phase.	
	Note Even though these workflow forms will be included, there are no mandatory forms or fields in the asset proposal phase.	

Note This option is enabled, by default. No action is required of you, to benefit from this option.

Enable or disable the Easy Business Process Proposal option

You can enable or disable the Easy Business Process Proposal option.

Steps

- 1. On the main toolbar, click \rightarrow **Settings**.
 - » The Settings page opens.
- 2. Click Workflows.
 - » The Workflows settings page appears on the Definitions tab page.
- 3. Click the Business Process Wizard.
- 4. In the Variables section, click 🖉.
 - » The Variables dialog box appears.
- 5. Scroll down to the variable "Enable the Easy Business Process Proposal option".
- 6. In the drop-down list, select:
 - **True**, to enable the option
 - False, to disable the option.
- 7. Scroll to the bottom of the Variables dialog box, and then click Submit.

Regulation-specific workflow forms

The data privacy workflows are designed to automate your governance processes, regardless of the regulation with which you need to comply. However, if there are regulation- or policy-specific considerations that you would like to introduce during the asset onboarding process, this feature accommodates that need.

You can design your own regulation- and policy-specific workflow forms for the onboarding of Business Process assets. Your custom forms will be completed by the Privacy Steward, in the appropriate phase of the onboarding process. **Note** This feature is available for the onboarding process of Business Process assets only.

Add regulation-specific workflow forms

You can add customized, regulation-specific workflow forms for the onboarding of Business Process assets.

Steps

 Create a workflow that includes your customized regulation-specific workflow forms. We recommend that you copy the Business Process GDPR Wizard workflow, which is available out of the box specifically for this purpose, and customize it outside of Collibra Platform. You can then deploy your customized workflow.

Warning Ensure that your customized workflow has a unique name and "processRef" before uploading it back into Collibra. That way it will not be overwritten when upgrading your Collibra environment.

- 2. Configure the Business Process Wizard workflow.
 - a. On the main toolbar, click \rightarrow Settings.
 - » The Settings page opens.
 - b. Click Workflows \rightarrow Definitions.
 - c. Click the Business Process Wizard.
 - d. In the Variables section, click 🖉.
 - » The Variables dialog box appears.
 - e. Scroll down to the variable "Please provide the General Information workflow reference ID that is used in the Business Process asset proposal phase and the characteristics management phase".
 - f. In the variable field, enter the UUID of the relevant Regulation asset, followed by a comma "," followed by the "processRef" of your customized workflow. For example: c0e00000-0000-0000-4400-00000000000, privYourCus-tomizedBusinessProcessGDPRWizard, where:

- "c0e00000-0000-0000-4400-0000000000" is the UUID of the GDPR Regulation asset.
- "privYourCustomizedBusinessProcessGDPRWizard" is the "processRef" of your customized workflow.
- g. Scroll to the bottom of the Variables dialog box, and then click Submit.

Business Process General Wizard workflow

The Business Process General Wizard workflow is a collection of workflow forms presented to:

- The Business User in the asset proposal phase of the asset onboarding process.
- The Business Steward in the characteristics management phase.

You can customize this workflow. As the name indicates, the purpose is to capture the most general information about the proposed asset, such as:

- A description of the proposed asset.
- Related Processing Categories assets.
- Related Technology assets.
- An estimation of the degree to which the process is automated.
- Whether or not the process is considered business-critical.

Note This workflow can only be customized for the onboarding of Business Process assets.

Customize the Business Process General Wizard workflow

You can customize the Business Process General Wizard workflow to meet your needs.

Steps

1. Create a customized workflow that includes your customized general information forms.

Tip We recommend that you copy the Business Process General Wizard workflow, customize it outside of Collibra Platform, and then upload the customized workflow back into Collibra.

Warning Ensure that your customized workflow has a unique name and "processRef" before uploading it back into Collibra. That way it will not be overwritten when upgrading your Collibra environment.

- 2. Configure the Business Process Wizard workflow.
 - a. On the main toolbar, click \rightarrow Settings.
 - » The Settings page opens.
 - b. Click Workflows \rightarrow Definitions.
 - c. Click the Business Process Wizard.
 - d. In the Variables section, click .
 - » The Variables dialog box appears.
 - e. Scroll down to the variable "Please provide the General Information workflow reference ID that is used in the Business Process asset proposal phase and the characteristics management phase".
 - f. In the variable field, enter the "processRef" of your customized workflow.
 For example: privYourCustomizedBusinessProcessGeneralWizard.
 - g. Scroll to the bottom of the Variables dialog box, and then click Submit.

Asset onboarding and change management

Data Privacy provides standardized procedures for creating and maintaining data privacyrelated assets. It involves the following main processes:

- Asset onboarding: The process of creating an asset and agreeing on its characteristics.
- Asset change management: The process of making changes to an approved asset.

Distinction between the types of data privacy assets

In the context of asset onboarding and asset change management, it is essential to distinguish between the following general categories of data privacy-related assets.

Category	Description
Business Process assets	 These assets are stored in Process Register domains. The ownership and characteristics of these assets can be modified throughout their lifespan. For these assets, the Business Steward, Data Steward, and Privacy Steward are required to contribute in the characteristics management phase.
Other business assets (that is, assets other than Business Process assets). They include the following asset types:	 The ownership and characteristics of these assets can be modified throughout their lifespan. For these assets, only the Business Steward is required to contribute in the characteristics management phase.
 Data Set Data Sharing Agreement Remediation Action Remediation Plan Dist 	

- Risk
- Technology

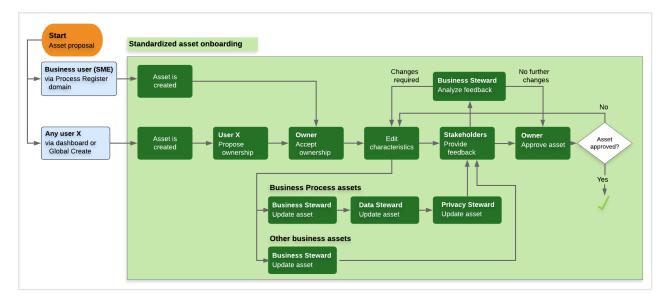
Asset onboarding

The objective of the asset onboarding process is to provide a standardized procedural flow for the creation of data privacy and risk assets.

Important This process does not apply to assessment assets. For complete information about conducting and managing assessments, go to Collibra Assessments.

Visual overview of the asset onboarding process

The following image illustrates the flow of the asset onboarding process for Business Process assets and other business assets, such as Risk assets and Data Set assets.



To progress through this process and advance a proposed asset towards approval, users complete a succession of workflows.

Onboarding Business Process assets and other business

assets

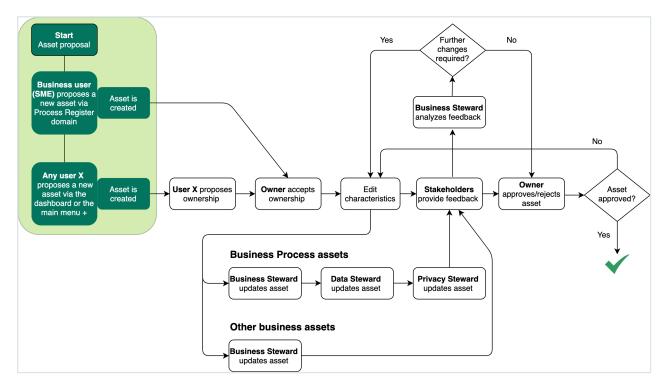
The following table shows the phases involved in the onboarding of Business Process assets and other business assets.

Asset types	Phases
Business Process	1. Asset proposal.
Data Set	2. Ownership proposal.
 Technology Asset 	3. Ownership acceptance.
 Data Sharing Agreement 	4. Characteristics management.
• Risk	5. Approval.
Remediation Plan	
Remediation Action	

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Asset proposal

In this phase of the asset onboarding process, users progress through a series of workflow forms to create an asset and add characteristics to the asset.



The following are a few examples of asset proposal workflows:

- New Business Process
- Risk Wizard
- Start PIA
- Remediation Action Wizard

Who can start these workflows

By default, any user can start a workflow. However, you can edit the workflow configuration options to restrict the right to certain resource roles on the parent asset. For example, you can restrict the right to start a workflow to the Owner or Business Steward resource roles.

When a user starts an asset proposal workflow, that user is assigned the responsibility of Stakeholder for the newly created asset.

Default domains

When you start an asset proposal workflow, an asset is created in the default domain. You can specify a new default domain for such assets.

In the ownership proposal workflow, the user proposes a long-term domain for the asset. If ownership is accepted in the ownership acceptance workflow, the asset is moved to the proposed domain.

Note Collibra Platform can be configured to allow for multiple assets with identical names in a single domain. However, this is not allowed in the data privacy-specific default domains, where all asset names must be unique.

Canceling the asset proposal

Asset proposal can be canceled any time before the asset has been approved. However, there is currently no automated cancellation procedure. The user can simply exit the relevant workflow. The Business Steward for the domain in which the newly created asset resides can then delete the asset.

Tip In the workflow wizard, clicking **X** to close the dialog box pauses the workflow. It does not cancel the workflow. The created asset remains in the default domain. The user can resume the workflow from their tasks page at another time.

Output and status evolution

The following table shows the status evolution based on the possible conditions.

Condition	Status of the asset
A user starts an asset proposal workflow	Is New
The asset proposal workflow is complete	Becomes Candidate

Tip

1. Start a workflow to propose a new asset:

F	or asset types	Star	t the workflow via
0	Business Process	° 1	The Privacy Dashboard The Invite to Business Process Register vorkflow
0 0 0 0		• T	he Data Protection Dashboard

- Remediation Plan
- 2. Complete the workflow forms. There are no mandatory fields in the workflow forms. The objective here is to create the asset. In the characteristics management phase of the onboarding process, the various stewards are called on to develop the asset in accordance with their areas of expertise.

Note The ownership proposal workflow forms follow immediately after the series of asset proposal workflow forms.

Propose an asset via the Privacy Dashboard

You can propose a new asset via the Privacy Dashboard.

Requirements and permissions

You have a global role with the Start workflow global permission.

Note Users that have a global role with the **Workflow Administration** or **System** administration permission do not require this permission explicitly.

Steps

- 1. On the Privacy Dashboard, click the relevant workflow button, for example, **New Business Process**.
 - » In this example, the New Business Process workflow wizard appears.
- 2. Enter a name for the new asset, and then click Create.

» A message stating that the workflow has been started appears. An asset in the New status is created in the default domain.

» In this example, the **New business process created** dialog box appears. The dialog box contains the **Go to business process asset page** button.

3. Go to the asset page of the new asset, and then continue to launch the next form in the workflow wizard.

Email notifications and tasks

When a workflow is completed during the asset onboarding and asset change management processes, the relevant users or user groups involved in the next phase:

- Receive a task on their Your Tasks page.
- Are notified of the task via email.

Suppose that a user group with 5 users is assigned the Business Steward role for a given domain. If a task is assigned to that group of Business Stewards, all 5 users will receive a task. However, only 1 user can start the task.

When one user has started the relevant workflow, the task is disabled and removed from the **Your Tasks** page of all other users that received the task.

The user that started the workflow for the task has to finish the workflow or cancel it, depending on the workflow. For that user, the task remains on the **Your Tasks** page until the workflow is complete. The user can pause the workflow at any time, and any information that was entered is saved. The workflow can then be continued from the **Your Tasks** page.

Pausing and restarting a workflow

If you have started a workflow and need to step away or shut down before completing it, you can pause the workflow and restart it at another time, without losing any of the information

you've entered or the selection you've made.

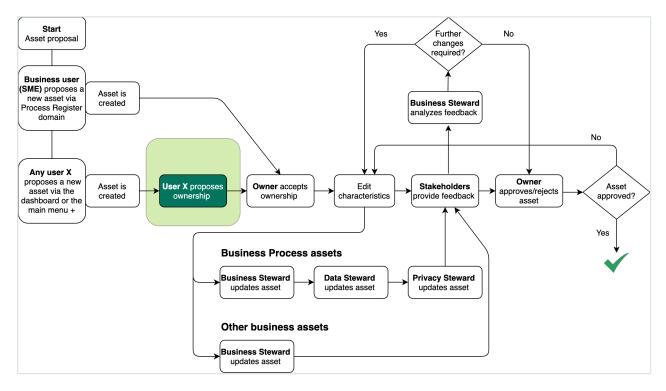
Wherever you are in the workflow, click **Save all changes** if you want to save all your changes, or click **X** if you want to close the workflow wizard. The asset is saved in the default domain.

When you're ready to continue with the workflow, go to the **Your Tasks** page and select the workflow.

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Ownership proposal

In this phase of the asset onboarding process, the user who started the asset proposal workflow proposes ownership of the asset.



Ownership at the domain level

In the asset proposal workflow, the new asset is created. In this step, the user who proposed the asset proposes the domain in which the asset will be stored long-term. If accepted via the ownership acceptance workflow, the Owner for the proposed domain becomes the Owner for the asset, as the responsibility is inherited from the domain.

Mandatory responsibilities in the target domain

When the user selects a target domain for proposal, Data Privacy verifies that the domain has the responsibilities necessary to complete the onboarding process.

If the proposed domain lacks the necessary responsibilities, a dialog box shows which responsibilities are missing. The user can then:

- Cancel the ownership proposal.
- Create the necessary responsibilities in the target domain and then click **Re-check roles** to continue with the ownership proposal.
- Choose a different target domain.

Tip To successfully use the out-of-the-box data privacy workflows, you need to create the following responsibilities for each of your data privacy-related domains:

- Data Protection Officer
- Owner
- Business Steward
- Data Steward
- Privacy Steward
- Community Manager
- Issue Manager
- Subject Matter Expert
- Stakeholder
- Requester

Canceling the workflow

To cancel the ownership proposal workflow, the user can click **Cancel** in the workflow wizard. In this case:

- The task is removed from the user's **Your Tasks** page.
- The asset remains in the default domain with the status Candidate.
- The ownership proposal workflow can be restarted at any time from the relevant asset page.

Tip In the workflow wizard, clicking **X** to close the dialog box pauses the workflow. It does not cancel the workflow. The user can resume the workflow from the **Your Tasks** page as long as the asset status is Candidate.

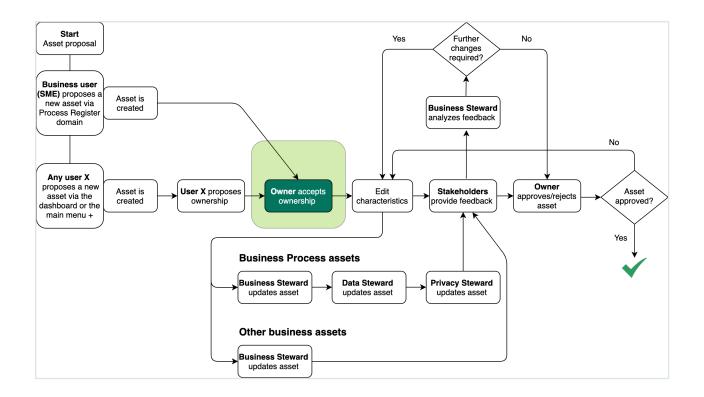
Output and status evolution

The following table shows the status evolution based on the possible conditions.

Condition	Status of the asset
Before any action is taken	Is Candidate
When a user selects a target domain for proposal and confirms the selec- tion	Becomes Ownership pro- posed

Ownership acceptance

In the ownership proposal phase, a user proposes a domain for the newly created asset. In this phase, the Owner or the Business Steward for the proposed domain accepts or rejects the proposal.



Starting the workflow

The relevant ownership acceptance workflow is automatically triggered at the completion of the ownership proposal phase.

The Owner and the Business Steward for the proposed domain receive a task that triggers a workflow to accept or reject the proposal.

The default configuration is such that only one Owner or Business Steward can accept or reject the ownership proposal, even if there are multiple Owners or Business Stewards for the proposed domain. However, you can configure Data Privacy so that multiple Owners or Business Stewards can vote to accept or reject the ownership proposal.

This task persists until an Owner or Business Steward accepts or rejects the proposal. If no action is taken, the out-of-the-box escalation process is run, in accordance with its configuration.

Due dates and the escalation process

Each task in a workflow has to be completed within a certain, configurable amount of time. The due date for each task is shown on the tasks page of the relevant users.

When the due date for an uncompleted task is approaching, the users assigned to the task are notified by email that the task is about to expire. Optionally, you can configure Data Privacy so that the user(s) receive a second task, to reassign the first task to another user or user group. This reassignment task is automatically removed if the original task is completed or the due date is reached without action.

If the task has not been completed by the due date, the relevant users (as defined by the responsibilities for the domain) are notified that the task was not completed. The task is abandoned and the onboarding process can continue without further delay.

Acceptance or rejection of the ownership proposal

When accepting or rejecting ownership, the Owner or Business Steward can provide a freetext explanation for the decision to accept or reject ownership. The text is recorded as a comment on the asset page.

Acceptance

If ownership is accepted, the asset is moved to the target domain.

By moving the asset to the target domain, any responsibilities not added directly at the asset level are inherited from the domain. Responsibilities that were added at the asset level remain unchanged.

Note Moving an asset from a default domain to a target domain might result in changes to the scoped assignment. This means the characteristics shown on the asset page might vary. However, none of the characteristics are removed, they just might not be shown. The user assigned to the Sysadmin global role has to configure the scopes and assignments so that the user can see the correct characteristics for the relevant domain.

Rejection

If ownership is rejected, the asset remains in the default domain. The Owner or Business Steward for the proposed domain can counter-propose an alternative domain, and the Owner or Business Steward for the counter-proposed domain receives a task to accept or reject the counter-proposal.

If ownership is rejected, the user who proposed ownership is notified and either:

- The ownership proposal workflow has to be run again.
 or
- The newly created asset can be manually deleted from the Collibra Data Governance Center environment.

Tip In the case of a rejection of ownership, we recommend that the appropriate stakeholders communicate as to why the proposal was rejected and, if possible, agree on a target domain for the asset. The ownership proposal workflow can then be run again.

If the Owner of the target domain does not propose an alternative domain, the user that proposed the domain in the first place is notified by a task. The task triggers the ownership proposal workflow, via which the user can propose an alternative domain.

If an alternative domain is selected, the Owner or Business Steward of the alternative domain will get a task to accept or reject the ownership of the proposed asset. The steps that follow are identical to the initial domain proposal.

Output and status evolution

In this phase of the onboarding process, the asset can undergo the following changes:

- If the ownership proposal is accepted, the asset moves from the default domain to the proposed domain.
- The status of the asset changes.
- One or more additional comments can be added to the asset.

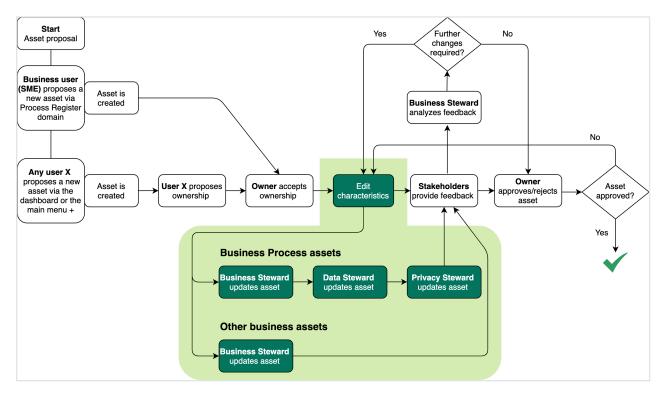
The following table shows the status evolution, based on the possible conditions.

Condition	Status of the asset
Before any action is taken	Is Ownership proposed
If the Owner for the proposed domain accepts the ownership proposal	Becomes Ownership accep- ted
If the Owner for the proposed domain rejects the ownership proposal and does not propose an alternative target domain (in which case, the user that initially proposed ownership has to rerun the ownership pro- posal workflow)	Becomes Ownership rejected
If the Owner for the proposed domain rejects ownership, but proposes an alternative target domain	Becomes Ownership pro- posed

Characteristics management

The characteristics management phase figures in both the asset onboarding process and the asset change management process.

In this workflow, the Owner, Business Steward, Data Steward, and Privacy Steward can, in turn, edit the characteristics of the asset.



If the Business Steward or Owner for the proposed domain accepts ownership via the ownership acceptance workflow, they receive a task prompting them to do one of the following:

- Edit the characteristics of the proposed asset.
- Go directly to the asset approval workflow.

Business Steward decides to edit the characteristics

Note This is the entry point for editing an approved asset, when a Business Steward clicks the **Start update workflow** button on the asset page of the relevant asset.

The Business Steward clicks the task in their tasks page and starts the relevant workflow.

- For Business Process assets, the Business Steward, Data Steward, and Privacy Steward are prompted, in succession, to edit the asset in accordance with the area of expertise of each user.
- For other business assets, such as Risk and Technology assets, only the Business Steward is prompted to edit the asset.

When the relevant stewards have completed the workflow, the Owner for the asset receives a task to accept or reject the changes.

- If the Owner accepts the changes, the asset approval workflow is automatically triggered.
- If the Owner rejects the changes, the Business Steward can do one of the following:
 - ° Re-run the workflow and further edit the characteristics.
 - Start the asset approval workflow.

Note Although we recommend that you use workflows to manage the editing of assets, the Business Steward and Owner can always edit assets directly via the relevant asset pages. Doing so does not trigger further review of the asset or the approval workflow.

Business Steward decides to not edit the characteristics

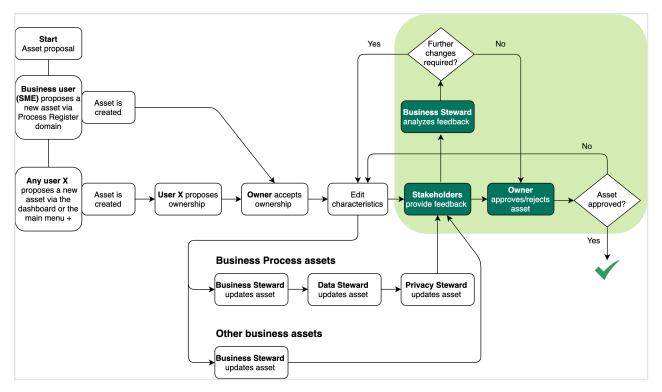
In this case, the Business Steward starts the asset approval workflow, and the Owner or Data Protection Officer receives a task to approve the asset.

Output and status evolution

The following table shows the status evolution, based on the possible conditions.

Condition	Status of the asset
Before any action is taken	Is Ownership accepted
The Business Steward starts the workflow to edit the characteristics of the asset	Remains Ownership accep- ted
The stewards complete the workflows to edit the characteristics of the asset	Becomes Approval pending
The Business Steward skips the characteristics management workflow and starts the asset approval workflow	Becomes Waiting for feed- back

Approval



In the Approval workflow:

- 1. Stakeholders provide feedback on the content and/or ownership of the asset.
- 2. The Business Steward or Owner considers the feedback and approves or rejects the asset.

Starting the workflow

The Approval workflow is triggered in one of two ways:

- Automatically, when the Owner for the asset accepts the changes that were made during the characteristic management phase.
- Manually, by the Business Steward or Owner clicking Approval on the asset page of the asset.

Note It is not possible to start the approval workflow if any other workflow is running for the asset.

Providing feedback

Before the actual approval, a configurable set of users (by resource role), per asset type, can provide feedback on the ownership and contents of the asset. These stakeholders:

- Indicate agreement with, or objection to:
 - the ownership of the asset, as determined by the domain in which the asset is stored.
 - ° the content of the asset, meaning the characteristics.
- Provide a free-text comment, if objecting to the ownership, content or both. The feedback is added as a comment on the asset page of the asset.

Note The feedback provided by stakeholders is not an approval or rejection. It is simply a means for the stakeholders to express their agreement or objection. The Business Steward or Owner will take the feedback into consideration and ultimately:

- Approve or reject the asset, if in the asset onboarding process.
- Approve or reject the changes to the asset, if in the asset change management process.

Mandatory and optional stakeholders

You can configure two sets of stakeholders from which to solicit feedback:

- A set for which feedback is mandatory.
 - For mandatory stakeholders, there is no timeout period for the submission of their reviews. The workflow is blocked until all mandatory stakeholders have submitted their reviews.
- A set for which feedback is optional.
 - Optional stakeholders are subject to a configurable timeout period. When the timeout period expires, they can no longer provide feedback.

Tip We recommend that you include:

- The Stakeholder resource role, among those designated as optional stakeholders.
- The Data Protection Office resource role, among the mandatory stakeholders.

Processing the feedback

After all mandatory stakeholders have provided feedback and either all optional stakeholders have submitted their feedback or the timeout period has expired, two scenarios are possible:

Scenario	What happens next?
None of the stakeholders have objected to the ownership or the content.	The approval workflow automatically continues. The relevant approver (by default, the Owner) receives an approval task.
One or more stakeholders have objected to either the ownership, the content or both.	 The Business Steward receives a task to review the feedback. Depending on the reason for the objections, the Business Steward can either: Continue with the approval, without making further changes to the proposed asset. Reject the asset and, as appropriate, manually restart the ownership proposal workflow or the workflow to edit the characteristics of the asset.

Status evolution

The following table shows the status evolution, based on the possible conditions.

Condition	The status of the asset
Before any action is taken.	Is Waiting for feedback.
For the duration of the feedback window, which closes when the con- figured timeout period has expired or when all mandatory stakeholders have submitted feedback.	Is Waiting for feedback.
The feedback window has closed, but the Business Steward has not yet completed the feedback review.	Becomes Feedback review.
This status is only applicable if one or more stakeholders objects to the ownership and/or content of the asset.	

Condition	The status of the asset
No objections to the ownership or content of the asset were submitted and the Business Steward has completed the feedback review, but the Owner has not yet:	Becomes Approval pending.
 Approved or rejected the proposed asset, if in the asset onboarding process. Approved or rejected the changes to the asset, if in the asset change management process. 	
The Owner:	Becomes Approved.
 Approves the asset, if in the asset onboarding process. Approves the changes to the asset, if in the asset change management process. 	
The Owner:	Becomes Rejected.
Rejects the asset, if in the asset onboarding process.Rejects the changes to the asset, if in the asset change management	

Notifications

process.

When the Owner has accepted or rejected the proposed asset, notification of the approval or rejection is sent via email to:

- The Business Steward.
- The user who proposed an asset or initiated an edit to an approved asset.
- All stakeholders, mandatory and optional, who were asked to submit feedback.

Asset change management

Whereas the result of the asset onboarding process is a new asset with the status Approved, asset change management is the standardized procedure for making changes to such approved assets.

Data Privacy offers three means by which to trigger a review request.

Triggering an asset review request

You may want or need to periodically review your approved data privacy-related assets. The following table shows the methods to trigger a review.

Note When a review request is triggered, a Review Request asset is created for the Business Steward or Owner to review the asset. They are not required to modify the asset.

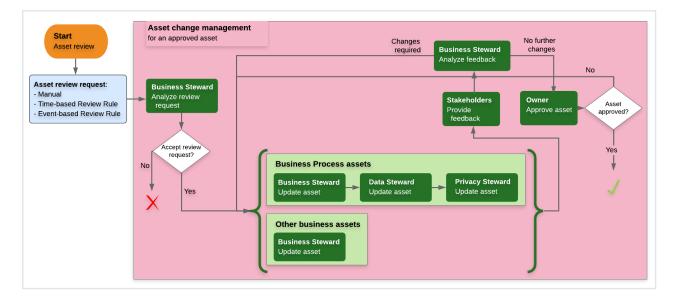
Trigger type	Description	Trigger mechanism
Manual	A trigger that is manually activ- ated. For example, you can manu- ally request a review of an approved asset if it is considered incomplete or inaccurate.	 Click Submit review request: On an asset page of an approved asset. In an asset view. From an asset view, you can trigger a review request for multiple assets of different asset types, at the same time. In a traceability view.
Time- based	A trigger that is automatically activated at a specified fre- quency. This is useful for assets that need periodic reviews to comply with regulations.	A Time-Based Review Rule asset that dictates, for example, that Business Process assets with a high busi- ness criticality should be reviewed every 12 months.
Event- based	A trigger that is automatically activated when specific char- acteristics of a related asset are changed.	An Event-based Review Rule asset that dictates, for example, that Business Process assets should be reviewed if changes have been made to the related Technology assets.

Update an asset directly

In addition to the above three scenarios, the Update asset directly workflow enables Business Stewards to start the asset change management process, without creating Review Request assets, assigning tasks to themselves to approve, or triggering the Review Request Handler workflow.

Asset change management process summary

This section provides an example of the asset change management process.



Note Assessment assets assess a situation at a specific moment in time. As such, their characteristics cannot be updated. If an assessment asset is deemed to be outdated, a new assessment asset is required. The new assessment asset is either an entirely new asset or a copy of a previous assessment asset. In the latter case, the asset inherits all of the characteristics from the previous assessment asset, which are then updated and eventually approved. At that point, the status of the previous assessment asset becomes Obsolete.

Review request is triggered

Suppose that a review request is triggered for one of your Business Process assets. In this case:

- A Review Request asset is created.
 The Review Request asset is related to the Business Process asset by the following relation type: [Asset] impacts / is impacted by [Issue]
- The Review Request Handler workflow is triggered and the Business Steward and Owner for the Business Process:
 - Are notified by email.
 - Receive tasks on their respective tasks pages.

Review Request asset is reviewed

The Business Steward or Owner reviews the details of the Review Request asset and decides whether or not changes to the Business Process asset are required.

Condition	What's next
Changes are required	 On the Review Request asset page, the Business Steward or Owner clicks Accept/Reject. The New review request dialog box appears. The Business Steward or Owner optionally enters a reason for accepting the review request, and then clicks Accept. The Characteristics Management workflow is started. The status of the Business Process asset becomes Under Review. The status of the Review Request asset becomes Accepted. If the review request was triggered manually by a user, the user is notified by email that the Business Process asset is under review.
Changes are not required	 On the Review Request asset page, the Business Steward or Owner clicks Accept/Reject. The New review request dialog box appears. The Business Steward or Owner optionally enters a reason for rejecting the review request, and then clicks Reject. The status of the Business Process asset remains Approved. The status of the Review Request asset becomes Rejected. The relation between the Business Process asset and the Review Request asset is maintained for auditing purposes. If the review request was triggered manually by a user, the user is notified by email that the Business Process asset will not be updated.

Review Rule assets

Business Stewards and Owners can configure review rules to trigger the review of assets of specified asset types. There are two types of review rules:

- Time-based Review Rule
- Event-based Review Rule

Note These two asset types are child asset types to the parent asset type Review Rule, which is a child of parent asset type Governance Asset.

When the configured conditions are met:

- A Review Request asset is automatically created.
- A task is assigned to the Business Steward to prompt a review of the related asset.

Review Rule assets can be:

- Created by clicking + on the main menu.
- Configured by editing an out-of-the-box Review Rule asset.
- Selected during the asset onboarding process, in which case a relation is created between the newly proposed asset and the Review Rule asset.

The conditions upon which a review is triggered are stored as attributes in the respective asset.

Out-of-the-box review rule assets

Data Privacy comes with out-of-the-box Time-based and Event-based Review Rule assets, which you can configure as needed. They are stored in their respective domains, in the Asset Change Management subcommunity of the Data privacy building blocks community.

Time-based review rule

As a Business Steward or Owner for a domain, you can create Time-based Review Rule assets to trigger the review of assets in your domain, after an elapsed amount of time. This is particularly useful for scheduling reviews of the assets for which data privacy regulations encourage periodic reviews.

Time-based review rules are founded on the cron value specified in the Frequency attribute. At the specified frequency, a Review Request asset is created, prompting a review of the related asset. For more information on cron, see Cron syntax.

To eliminate the chance of overly frequent review requests, the cron value of the Frequency attribute is linked to the value of the Last Modified attribute of the related asset.

Example

You configure a Time-based Review Rule asset to trigger the review of related Technology Assets every 12 months. Suppose, then, that a related Technology Asset is updated for a reason unrelated to your Time-based Review Rule asset. When the changes have been approved, its Last Modified date is updated. In accordance with the cron value specified in your Time-based Review Rule asset, the related Technology Asset will be reviewed 12 months after it was last modified.

Time-based reviews can only be triggered for assets that have the status Accepted or Approved.

Example

You configure a Time-based Review Rule asset to trigger the review of all Business Process assets 12 months after their status becomes Accepted. When the 12 months have elapsed:

- A Review Request asset is created with the status New.
- The status of the Time-based Review Rule asset does not evolve; it remains Accepted.
- The following relation is established:
 - The Review Request asset is related to the Business Process asset by the relation type: [Asset] impacts / is impacted by [Issue].

Create a Time-based Review Rule asset

There are two ways by which you can create Time-based Review Rules assets:

- Via the global **Create** button.
- By editing an out-of-the-box Time-based Review Rule asset.

Steps

Via the global Create button

- 1. On the main toolbar, click +.
 - » The Create dialog box appears.
- 2. On the Assets tab, select Time-based Review Rule.

3. Enter the required information.

Field	Description
Asset type	The asset type. This is pre-populated.
Domain	The domain in which the asset will be created.
Asset name	The name of the asset.

4. Click Create.

- » A message stating that the asset is created appears.
- 5. Go to the asset page of the newly created asset.
- 6. Enter the required information.

Field	Description
Description	A description of the review rule.
	The text you enter in this field will be added as a comment in the Review Request asset that is created when the rule triggers the review of the related asset.
	Example "Review Business Process Asset with the business criticality indicated as "High" every 12 months. Please consider reviewing Business Process if the overall risks for the data subjects, and attributes like controllers, processors, purposes or sensitivity of data associated with this processing have changed significantly."
Revision Frequency	The frequency with which related assets are to be reviewed.
	For this attribute, you need to select a cron value. Cron values are represented by Code Value assets, in the CRON codes domain.
	Example The cron code "0 0 0 15 APR ? *" equates to every year on April 15.
Asset Type - Provide UUID Of The Asset Type To Hop To	The UUID of the asset type to which this rule will apply.

Field	Description
Filter Assets of Review Asset Type Based on an Attribute Value	Specify whether or not this rule will also depend on the value of a certain attribute, in addition to the cron value in the Revision frequency attribute.
	For example, you want to review all Business Process assets every 12 months, but only if the value of the Risk attribute is "High."
	The possible values are:
	 Yes - filter based on attribute value No - apply rule to all assets
lf Yes, Provide Attribute Type UUID	This is applicable only if you choose Yes - filter based on attribute value for the previous attribute.
Attribute Value to Filter On	The value that would trigger a review.

7. On the Actions menu, click Edit.

- » The Edit Asset dialog box appears.
- 8. In the Status field, select Enabled, and then click Save.
 - » The Time-based Review Rule asset is enabled.

Edit an out-of-the-box Time-based Review Rule asset

1. Go to the asset page of an out-of-the-box Time-based Review Rule asset.

Tip You can find these assets in the Asset Change Management subcommunity, in the Data privacy building blocks community.

Edit the asset's attributes and relations to meet your needs.

Event-based review rule

As a Business Steward or Owner for a domain, you can create Event-based Review Rule assets to trigger the review of other assets, based on changes to specified attributes or relations of those assets.

The value of the "Type of event" attribute in the Event-based Review Rule asset determines the basis upon which a review request is triggered.

Value of "Type of event" attribute	Description
On attribute change	Event-based Review Rule founded on changes to one or more specified attributes of a related asset of a specified asset type.
	Example You create an Event-based Review Rule asset that triggers the review of a related PIA asset if the value of the Sensitivity attribute of a Data Set asset changes. If the value of the attribute changes, and therefore the related Data Set asset is affected, a review of the PIA related to that Data Set is needed.
On relation change	Event-based Review Rule founded on changes to one or more specified relations of a related asset of a specified asset type.
	Example You create a Event-based Review Rule asset that triggers the review of a related PIA asset if the relation between a related Controller asset and a Business Process asset changes.

Note Event-based review rules are triggered by changes to assets resulting specifically from asset change management workflows. This means that changes to assets made directly via an asset page will not trigger a review of the asset.

Create an Event-based Review Rule asset

There are two ways by which you can create Event-based Review Rules assets:

- Via the global **Create** button.
- By editing an out-of-the-box Event-based Review Rule asset.

Steps

Via the global Create button

- 1. On the main toolbar, click +.
 - » The Create dialog box appears.
- 2. On the Assets tab, select Event-based Review Rule.
- 3. Enter the required information.

Field	Description
Asset type	The asset type. This is pre-populated.
Domain	The domain in which the asset will be created.
Asset name	The name of the asset.
Click Oresta	

4. Click Create.

- » A message stating that the asset is created appears.
- 5. Go to the asset page of the newly created asset.
- 6. Enter the required information.

Field	Description
Description	A description of the review rule. The text you enter in this field will be added as a comment in the Review Request asset that is created when the rule triggers the review of the related asset.
	Example "A review request has been triggered due to a change in the relation between a Data Set asset that is consumed by this Business Process asset and a Data Element asset. Please consider reviewing the Business Process asset, as a change to the relation between the Data Set asset and the Data Element asset might affect the attributes, such as Safeguard, of the Business Process asset."

Field	Description
Event Asset Type - Provide UUID of Asset Type Where the Event Happens	The UUID of the asset type that this review rule will monitor. Assets of the specified asset type will be subject to review if triggered by this rule.
Type of Event	 Determines the type of change that will trigger a review of a related asset. The possible values are: On attribute change On relation change
Attribute or Relation Type UUID	The UUID of the attribute or relation type (depending on your choice in the Type of event field) that this review rule will monitor.
For Relation Type, Target Asset Type UUID of the	The UUID of the asset type of the target asset.
Relation Type	Note This field is applicable only if you selected On relation change in the Type of event field.
For Relation Type, Is Target Asset Type Head or Tail of the Relation?	Specify whether the target asset represents the head or tail in the relation with the event asset.
	Example The asset type Legal Basis is the head of the relation type Legal Basis determines lawfulness of / lawfulness determined by Business Process.
	Note This field is applicable only if you selected On relation change in the Type of event field.

Field	Description
Path to Review Asset Type	A set of complex relations that specifies the path from the asset in which the change occurred (the event asset) to the asset that should be reviewed.
	Use a progressive sequence to specify the order of the path:
	 Sequence 1 is the path from the event asset, to the first-level asset, as determined by the specified relation type. Sequence 2 is the path from the first-level asset to the second-level asset, again as determined by the specified relation type. You can specify as many sequences as is necessary. The last review asset type, as per the sequences in the table, is the asset type for which a review request is created.
Relation Type UUID	The UUID of the relation type between:
	 For Sequence 1: The event asset and the first-level review asset type. For subsequent sequences: The first-level review asset type and the subsequent level review asset types. For the last sequence: The previous-level review asset type and the asset type for which a review request will be created.
Review Asset Type	The UUID of the asset type of:
UUID	 For Sequence 1: The first-level review asset type. For subsequent sequences: The subsequent level review asset types. For the last sequence: The asset type for which a review request will be created.
Head/Tail	Specify whether:
	 For Sequence 1: The event asset represents the head or tail in the relation with the first-level review asset type. For subsequent sequences: The preceding-level review asset types represent the head or tail in the relation with their successive level asset types. For the last sequence: The penultimate level asset type represents the head or tail in the relation with the asset type for which a review request will be created.

7. On the Actions menu, click Edit.

» The Edit Asset dialog box appears.

8. In the Status field, select Enabled, and then click Save.

» The Event-based Review Rule asset is enabled and will be detected by the » Govern Asset workflow» .

Edit an out-of-the-box Event-based Review Rule asset

1. Go to the asset page of an out-of-the-box Event-based Review Rule asset.

Tip You can find these assets in the Asset Change Management subcommunity, in the Data privacy building blocks community.

Edit the asset's attributes and relations to meet your needs.

Govern Asset workflow

This workflow monitors all enabled Event-based Review Rule assets.

When the conditions configured in an enabled Event-based Review Rule asset are met, this workflow either:

- Creates a new Review Request asset, to prompt the Business Steward or Owner to review the related asset.
- If the related asset is already under review, meaning an in-process Review Request asset exists, it updates that Review Request asset. Specifically, the description of the review request is added as a comment in the existing Review Request asset.

The Review Request Handler workflow is also triggered to manage the acceptance or rejection of the review request.

Review Request asset

When an asset review is triggered, either manually or via a Time-based or Event-based Review Rule, a Review Request asset is created and the Review Request Handler workflow is started.

The following is true of the Review Request asset:

• It is created in an Issues domain of the type Issue Vocabulary Type, in the community of the related asset.

Warning This domain is hidden, which means it does not appear in the Collibra Browser. You can view all assets in these hidden domains through the Data Helpdesk.

- The name of the asset is formatted as: [RR] <related asset name> creation date of Review Request asset
- Example: [RR] Invoicing 2019/04/15
- It has the status New.
- It is linked to the related asset by the relation type [Asset] impacts / is impacted by [Issue].

Multiple review requests for a single asset

Over the lifetime of any privacy-related asset, the asset may need to be reviewed and updated. It is possible to have multiple, simultaneous review requests for a single asset. Keep in mind, however, that if there are multiple Review Request assets for a single asset, only one will have the status New, Accepted, or Rejected. All others will have the status Obsolete.

Example

Suppose that a user finds the description of an approved Business Process asset to be misleading. The user manually triggers a review request and a Review Request asset is created. At this point:

- The Review Request Handler workflow is triggered.
- The status of the Business Process asset is Approved.
- The status of the Review Request asset is New.
- The relation [Issue] impacts / is impacted by [Asset] is automatically added between the two assets.

The Business Steward reviews the request, agrees that a change is warranted, and the Business Process asset follows the asset change management process.

- The status of the Business Process asset becomes In review.
- The status of the Review Request asset is In review.

However, before the changes to the Business Process asset are approved, two more review requests are triggered for the same Business Process asset. Because the recent changes

have not yet been approved, no new Review Request assets are created for the two new review requests. Rather, the details of the new requests are added as comments in the existing Review Request asset, and the Business Steward is notified of the new requests.

Eventually all of the changes to the Business Process asset are made and formally approved via the approval workflow. At this point:

- The status of the Business Process asset becomes Approved.
- The status of the Review Request asset becomes Implemented.
- For audit purposes, the relation between the two assets is maintained.

Now suppose that a new review request is triggered for the same Business Process. In this case:

- A new Review Request asset is created.
- The Business Process asset is now:
 - ° Related to the new Review Request asset, which has the status New.
 - Related to the original Review Request asset, the status of which changes from Implemented to Obsolete.

The relations between the Business Process asset and its related Review Request assets will be maintained for the life of the Business Process asset. If there are multiple Review Request assets related to the Business Process asset, exactly one will have the status New, In review, or Rejected. All others will have the status Obsolete.

Review Request asset page

The Review Request asset page contains all of the details about the review request.

If additional review requests are triggered for an asset that is already under review, the details of each additional request are added as comments on the Review Request asset page.

Review Request Handler workflow

When an asset review is triggered:

- A new Review Request asset is created with the status New.
- The Review Request Handler workflow is triggered.

This workflow prompts the Business Steward to review the details of the Review Request asset and accept or reject the asset.

If the Review Request asset is	Then
Accepted	The status of the Review Request asset becomes Accepted.
	The Review Request Handler (Sub Process) workflow is triggered on the business asset to be reviewed, and the asset follows the asset change management process.
	When the proposed changes have been approved:
	The status of the Review Request asset becomes Implemented.The status of the updated asset becomes Approved.
Rejected	The status of the Review Request asset becomes Rejected.The status of the asset to be reviewed remains Approved.

Requester and Stakeholder responsibilities

If an asset review is triggered manually, the user that triggered the review request:

- Is assigned the Requester responsibility for the Review Request asset.
- Can select **Notify me on the progress of the asset(s)** when triggering the request to also be assigned the Stakeholder responsibility for the Review Request asset.
- Receive notifications about any changes to the Review Request asset.

Status evolution

Review Request assets can have the following statuses.

Condition	Status
The Review Request asset is created.	New
The Business Steward reviews the Review Request asset and decides that change to the related asset is warranted.	Accepted
The Business Steward reviews the Review Request asset and decides that no change to the related asset is warranted.	Rejected

Condition	Status
The related asset has been updated and all changes have been approved.	Implemented
For a given asset, a related Review Request asset exists with the status Implemented. For the same asset, a new Review Request asset is created.	 The status of the new Review Request asset is New. The status of the imple- mented Review Request becomes Obsolete.

Edit an approved asset as a Business Steward

There are three means by which to trigger the review of an approved asset. In each case:

- A Review Request asset is created.
- A task is assigned to the Business Steward of the relevant asset.
- The Review Request Handler workflow is started.

The Business Steward reviews the details of the request and accepts or rejects the Review Request asset.

The Update asset directly workflow enables Business Stewards to start the asset change management process, without creating Review Request assets, assigning tasks to themselves to approve, or triggering the Review Request Handler workflow.

Starting the Update asset directly workflow

Any Business Steward can start this workflow by clicking **Start update workflow** on the asset page of the relevant approved asset.

This triggers the Characteristics management phase of the asset change management process.

• For Business Process assets, the Business Steward, Data Steward, and Privacy Steward are prompted, in succession, to edit the asset in accordance with the area of expertise of each user.

• For other business assets, such as Risk and Technology assets, only the Business Steward is prompted to edit the asset.

Applicable asset types

- Business Process
- Data Set
- Technology Asset
- Data Sharing Agreement
- Risk
- Remediation Plan
- Remediation Action

Privacy landing page

Privacy landing page is an out-of-the-box landing page for your privacy and risk program. It helps you manage protected information and perform key privacy tasks efficiently. The landing page features sections that offer information on various aspects of the program. As a Privacy Steward, you can use the landing page to find privacy assets, view assessments, start workflows, and find answers to frequently asked privacy questions.

Accessing the Privacy landing page

To access Privacy landing page, the **Privacy landing page** setting in Collibra Console needs to be enabled, and you need to have a global role with the **Privacy** global permission. You can then access the landing page via \rightarrow **Privacy**.

0	Collibra Data Privacy		
	Manage Your Priv Collibra Data Privacy lets sensitive data, automate collaboration, and ensure	you discover and protect privacy operations and	
		My Privacy Program	
	Manage Business Processes		
	What You Can Do Create business processes, data sets, technology assets, and risk assets to help you map where your data is stored and how it's used across your organization.	Worflows New Business Process New Data Set New Technology Asset New Risk	Views See your lists for process, data, and technology assets. Process Registers Data Registers Technology Assets
	Assess Risks		
	What You Can Do Assess the privacy risks to your customers and employees and implement appropriate measures.	Links Assessments Visit Assessments to assess data, minimize risk, and demonstrate compliance. Reporting Templates Visit Collibra Marketplace to get Collibra Insights Report Templates you can use to document your privacy framework readiness for GDPR or CCPA.	Views See your lists for assessments and risks. Assessment Review Risk and Controls Register
	Manage Data Sharing		
	What You Can Do Ensure that shared sensitive data is protected even for specific work.	Workflows and Actions New Data Sharing Agreement Create a Third-Party Privacy Profile Visit Product Resources to download the Third-Party Privacy Profile Import Template, build a profile, and import it into Collibra.	Views See your data sharing information. Data Sharing Agreements Third-Party Privacy Profiles
	Manage Incidents and Breaches		
	What You Can Do Plan appropriate actions to address risks before they occur.	Workflows New Remediation Action New Remediation Plan Log Potential Security Breach	Views See your lists related to security. Issue Register Data Breach Identification Remediation Lifecycle Events

Features of the Privacy landing page

Privacy landing page is divided into sections, each designed to help you manage various aspects of privacy such as business processes, risks, data-sharing agreements, incidents, and breaches. The sections contains workflows, views, and links to help you oversee and manage your organization's personal information.

Workflows

Workflows streamline tasks such as proposing a new business process, identifying risks, suggesting remediation actions, or logging potential security breaches. When you start a workflow, Collibra assigns tasks to the appropriate stakeholders to address your request.

Workflow descriptions

The following table describes the workflows you can start from the Privacy landing page.

Workflow	Description
New Business Process	To create Business Process assets that are used to document high-level business processes.
New Data Set	To create Data Set assets that contain personal data.
New Technology Asset	To create a Technology asset.
New Risk	To create Risk assets, and to determine their events, risks sources, and consequences; the controls that are used to mitigate the risks; the inherent and residual likelihood; the severity and risk level; and the assets to which the risks are related.
New Data Sharing Agreement	To create Data Sharing Agreement assets that govern the relationship and activities between a Controller and a Processor, and help both parties understand their responsibilities and liabilities.
New Remediation Action	To create Remediation Action assets that address one or more Risk assets.
New Remediation Plan	To create Remediation Plan assets that group multiple Remediation Action assets.

Workflow	Description	
Log Potential Security Breach	To log a potential breach of security that could lead to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data.	

Views

Views provide access to lists of pre-filtered data, such as process registers, which store your Business Process assets, or third-party privacy profiles, which organize essential information about vendors and suppliers.

Links

Links allow you to access Assessments to help monitor your organization's compliance with privacy regulations, and reporting templates to document your privacy framework readiness.

Privacy-related diagram views

Data privacy regulation compliance is a perfect use case for highlighting the powers of Collibra's diagram capabilities.

To view a diagram of an asset, go to the asset page, and then click the **Diagram** tab.

The following table highlights some particularly useful diagram views.

View	Description
Business Process Data Flow View	The default view for Business Process assets is the Business Process Data Flow View. This view shows where data comes from and where it goes, the related Party assets, the related Application, Directories and File assets, and in which Jur- isdictions the activities take place. At a glance, you can view how data flows across borders, which can help you with the analysis required for cross-border transfers. You can use this high-level view as a starting point for discovery.

View	Description
Business Process Activity with Recipient View	The Business Process Activity with Recipient View provides a granular view of Business Process assets. It shows the following:
	 All supporting Technology Assets, for example, Application, Directory, and File assets. All Party assets. All Jurisdiction assets.
	This view is best suited for a detailed analysis of a Business Process asset.
Parties and Technology used in Process View	It is important to know which technology assets you use and which parties are involved in your processes. This view shows exactly that.
Vendor Impact View	The Vendor Impact View shows only Party assets of the Party Role Type Third Party . It shows the same information as the Parties and Technology Used in Pro- cess View, but filters out all Party assets that are not of the Party Role Type Third Party .

Working with pictures

A picture is a copy of a diagram that is stored separately from the original. You can edit the pictures in the same way you edit diagrams, but there are fewer options available.

Pictures are an easy way to save a diagram after you configured it. You can then reuse it later.

Business processes can change on a regular basis. If a change to a business process introduces greater risk to the rights and freedoms of data subjects, you will need to re-run a PIA. As such, a saved collection of pictures can help during audits.

You can work with pictures similarly to how you work with traceability views. You can move nodes, collapse and expand boxes, export, and so forth.

For complete information on working with pictures, go to Pictures.

Managing security breaches

Data Privacy offers a framework for managing potential and actual security breach issues. It consists of the following elements:

- The Log Potential Security Breach workflow.
- The Security Breach Management workflow.
- Personal Data Impact Analysis View.
- The Data Helpdesk, where all Security Issue assets can be viewed.

Workflows

The workflows help you to:

- Log a potential security breach.
 If someone suspects a potential breach, it has to be logged and investigated.
- Investigate any potential security breaches that have been logged.
 Not every potential breach is an actual breach. Some potential breaches are the result of other breaches.
- Report actual security breaches to the appropriate stakeholders.
 During the workflow, users are prompted to add evidence of notification to the Supervisory Authority. Such evidence is added as attachments in the Files tab, where you can add more files at any time.

Log Potential Security Breach workflow

The result of the Log Potential Security Breach workflow is a Security Issue asset. It entails some preliminary information, such as the Technology assets that might have been affected by the potential breach. This information is recorded as attributes in the Security Issue asset.

Keep in mind that the Security Issue asset does not represent an actual data breach, but rather a potential data breach, which requires further investigation. Upon investigation, the possible conclusions are the following:

- There was no breach.
- There was a singular, stand-alone breach.
- There was a breach that is part of a bigger breach.

Note Before starting this workflow, ensure that the Community Manager and Privacy Steward responsibilities have been created for the New Data Issues domain, to match the resource roles that appear in the Roles section of the workflow settings.

The New Data Issues domain:

- Is the domain in which the Security Issue is created and stored.
- Is located in the Data Governance Council community.
- Is "hidden" in the community-domain browser, to avoid it being inadvertently deleted.

You can view all the assets in this domain via the Data Helpdesk. You can also find the domain by searching for it via the Search field.

Start the workflow

You can $\log a$ potential data breach via the Privacy dashboard or by clicking + in the main menu.

Security Breach Management workflow

Th Security Breach Management workflow helps you to manage security breach issues.

When a Security Issue is created via the Log a potential security breach workflow, this workflow starts automatically. It is an extended version of the Collibra Platform out-of-the-box Issue Management workflow, tailored for your privacy and risk program.

Warning To use this workflow, the Community Manager responsibility must be created for the New Data Issues domain.

Relevant resource roles

The workflows involve the following roles:

Resource role	Tasks		
The Community Man- ager for the New Data Issues domain in which the Security Issue is cre- ated.	Assigns an Issue Manager for the Security Issue asset.		
	 Note If the Community Manager responsibility has not been created for the New Data Issues domain, a task is sent to the Sysadmin global role, by default, to create the responsibility. To configure a role other than the Sysadmin global role for this task, use the variable "User expression is for the 'Admin' role in process" in the general workflow settings. The workflow cannot continue until the Community Manager responsibility has been created. 		
Issue Manager	Collects and provides all necessary information by completing the workflow.		
	As for any resource role, the Issue Manager resource role can be assigned to a single user, a user group or both.		
	If the Issue Manager role is assigned to a user group, the task appears in the list of tasks for every user in the group, and any user can launch the task. When any single user accepts the role and completes the task, the task is removed from the task list for all other users.		
	Warning If you assign the role of Issue Manager to a user group, and a single user rejects the task, the task is rejected for all users in the group and any individual user to whom you may have assigned the resource role.		

Resource role	Tasks	
Privacy Steward	Reviews the analysis and accepts or rejects the Security Issue asset. If the asset is accepted, the Privacy Steward then reports to the relevant stakeholders.	

Privacy Steward tasks

If the Issue Manager determines that there has been a data breach, the Privacy Steward reviews the analysis and accepts or rejects the Security Issue asset.

Reject or accept?	What's next?		
Reject	The Security Issue asset is assigned back to the Issue Manager, who has to revise the details.		
Accept	The Privacy Steward receives two tasks for each stakeholder to which reporting is due:		
	A task to notify the Stakeholder.A task to add evidence of notification in the Security Issue asset.		
	When the Privacy Steward has notified all relevant stakeholders, the status of the Security Issue asset becomes Resolved, and it can be archived.		

Reporting to stakeholders

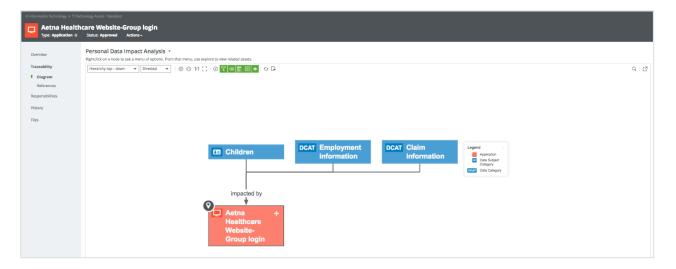
The perceived level of risk to data subjects determines to whom the Privacy Steward has to report.

Perceived level of risk	You must report to		
Norisk	 No one, although you might want to report to internal stakeholders, such as management. 		
Low to moderate	Internal stakeholders.Supervisor authority.		
High	Internal stakeholders.Supervisory authority.Data subjects.		

Personal Data Impact Analysis View

The Personal Data Impact Analysis View helps you analyze the impact of a security breach of your personal data by showing you the Data Category and Data Subject Category assets that have been impacted by the breach.

The following image shows an example of the Personal Data Impact Analysis view. It shows that when Aetna Healthcare Website Login is breached, data on Children, Employment Information, and Claim Information will be compromised. To manage the data breach, you need to store this view during the workflow.



Remediation plans and actions

If you become aware of certain risks, you can document your remediation plans and actions to reduce exposure, to a level that is aligned with your company's risk appetite.

Typically, a remediation action represents an actionable and measurable item to address a specific risk or combination of risks, whereas a remediation plan consists of a predefined sequence of remediation actions, used to address issues that require multiple actions to remedy.

During the onboarding of Remediation Plan assets, users are prompted to add related Remediation Action assets and can start the onboarding workflow for such assets.

You can map your Remediation Plan and Remediation Action assets to your Risk assets wen completing a DPIA/PIA or Legitimate Interest Assessment.

Workflows

Data Privacy comes with the following out-of-the-box workflows:

Workflow	Applicable regulations	Description
New Remediation Action	CCPAGDPR	Starts the creation, ownership acceptance and initial approval of a Remediation Action asset.
New Remediation Plan	CCPAGDPR	Starts the creation, ownership acceptance and initial approval of a Remediation Plan asset.

Treatment and review of proposed assets

The treatment and review workflow are started by the Business Steward, from the asset page of the relevant Remediation Plan or Remediation Action asset. It allows the Business Steward to:

- Document actions taken, and progress made, with regard to Remediation Plan and Remediation Action assets.
- Create relations with the assets that result from the Remediation Action, meaning a new Control asset.

Note The completion of this workflow does not result in the creation of a new asset. Rather, new and/or modified attributes and relations are added to the relevant Remediation Plan or Remediation Action asset. The details of the work done are stored as comments.

If the implementation of the remediation plan or action spans a long time period, the Business Steward can use this workflow to log intermediate progress.