



ARIS

ARIS ACCELERATORS FOR GDPR USE CASE

Version 10.0 - Service Release 4

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This document applies to ARIS Risk & Compliance Manager Version 10.0 and to all subsequent releases.

Specifications contained herein are subject to change and these changes will be reported in subsequent release notes or new editions.

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1 Legal notices

This manual describes the settings and features as they were at the time of print. Since manual and software are subject to different production cycles, the description of settings and features may differ from actual settings and features. Information about discrepancies is provided in the Readme file that accompanies the product. Please read this file and take the information into account when installing, setting up, and using the product.

If you want to install all technical and/or business system functions without the services of Software AG, you require extensive knowledge of the system to be installed, its intended purpose, the target systems, and their various dependencies. Due to the number of platforms and interdependent hardware and software configurations, we can only describe specific installations. It is not possible to document all settings and dependencies.

When you combine various technologies, please observe the manufacturers' instructions, particularly announcements concerning releases on their Internet pages. We cannot guarantee proper functioning and installation of approved third-party systems and do not support them. Always follow the instructions provided in the installation manuals of the relevant manufacturers. If you experience difficulties, please contact the relevant manufacturer.

If you need help installing third-party systems, contact your local Software AG sales organization. Please note that this type of manufacturer-specific or customer-specific customizing is not subject to the standard Software AG software maintenance agreement and can be performed only on special request and agreement.

If a description refers to a specific ARIS product, the product is named. If this is not the case, names for ARIS products are used as follows:

Name	Includes
ARIS products	Refers to all products to which the license regulations of Software AG standard software apply.
ARIS Clients	Refers to all programs, for example, ARIS Architect or ARIS Designer that access shared databases via ARIS Server.
ARIS Download clients	Refers to ARIS clients that can be started from a browser.

2 Text conventions

Menu items, file names, etc. are indicated in texts as follows:

- Menu items, key combinations, dialogs, file names, entries, etc. are displayed in bold.
- User-defined entries are shown <in bold and in angle brackets>.
- Single-line example texts (for example, a long directory path that covers several lines due to a lack of space) are separated by ✓ at the end of the line.
- File extracts are shown in this font format:

 This paragraph contains a file extract.
- Warnings have a colored background:

Warning

This paragraph contains a warning.

3 Introduction

ARIS Accelerators for GDPR is a set of ARIS product enhancements, configurations, databases, reports, and best practices to accelerate the realization of compliance regarding General Data Protection Regulation (GDPR) (page 38). The following use cases provide detailed information on how to use the different software applications.

Prerequisite

All relevant components described in the ARIS Accelerators for GDPR Installation Guide must be installed.

- Create inventories and describe assets (page 8)
- Identify processing activities and related assets (page 11)
- Regulatory description of processing activities (page 16)
- Regulatory (pre-DPIA) qualification of processing activities (page 19)
- Risk assessment of processing activities (page 23)
- Generate the required internal and external reports (page 26)
- Monitor related indicators (page 29)

4 Relevant applications and components

The following ARIS software is required to use ARIS Accelerators for GDPR:

ARIS Architect

With ARIS Method you identify data, systems, and processes relevant to GDPR and you describe object types according to the GDPR requirements. Furthermore, you use ARIS Architect to configure ARIS Risk & Compliance Manager for the relevant surveys and risk assessments and you run analysis reports.

ARIS Connect

With ARIS Connect you capture so-called processing activities, including related data, systems, processes, and legal entities. Compliance managers prepare surveys and risk assessments and they monitor the entire GDPR implementation process using ARIS Aware dashboards.

ARIS Risk & Compliance Manager

In ARIS Risk & Compliance Manager you manage surveys, risk assessments, and issues for improvements. You also capture and monitor incidents. This GRC workflow is audit-secure and includes the segregation of duties. ARIS Risk & Compliance Manager is integrated in ARIS Architect and ARIS Connect.

For detailed information, refer to the corresponding online help and the manuals.

ARIS Accelerators for GDPR contains the following components:

ARIS method extension filter

ARIS report templates

- Output record of processing activities (page 26)
- Output GDPR management report (page 26)
- Output extended GDPR management report (page 27)
- Output survey intelligence report (page 27)
- Data allocation matrix (page 28)

ARIS databases

- GDPR regulation model
- GDPR questionnaires

ARIS Connect configuration (fact sheets)

- Record of processing activity
- Processing activity description diagram
- Enhancements on several other fact sheets like risk, survey task, etc.

ARIS Aware dashboards

- GDPR Overview (page 29)
- GDPR Workflow (page 34)

5 Relevant licenses

ARIS Accelerators for GDPR is made available by contractual licensing. For detailed information on license privileges and function privileges needed in the different software applications, for example, ARIS Connect, refer to the corresponding online help.

6 Relevant roles

ROLES ACCORDING TO ARTICLE 4 OF THE EU GDPR

Controller

Determines the purpose and means of processing personal data.

Processor

Processes personal data on behalf of the controller.

ROLES IN COMPANIES

Data protection officer

Informs and advises the controller/processor of their obligations, monitors compliance, provides advice and acts as the contact for the supervisory authority.

Data protection representative

Represents the controller/processor with regard to their respective obligations under GDPR.

7 Customizing

The components of ARIS Accelerators for GDPR are preconfigured. You can adapt and enhance them to an individual GDPR solution that meets your company-specific requirements. You can customize all components in accordance with the following technical restrictions:

- Do not change the API names of ARIS Method enhancements.
- Keep to the conventions. The corresponding references can be found in the descriptions. Especially ARIS Risk & Compliance Manager requires extensive knowledge.
- Back up your customized data carefully to make sure it is not overwritten by an update.

If you have any questions about specific installations that you cannot perform yourself, please contact your local Software AG sales organization

(https://empower.softwareag.com/public_directory.asp).

8 Create inventories and describe assets

Identify and describe processing activities (page 39) based on data, systems, and processes of your organization. Use **Processing activity description diagram** models and objects of the types **Organizational unit**, **Cluster/data model**, **Application system type**, and **Function** to model processing activities and associated information in ARIS Architect. Then specify the relevant object attributes according to your GDPR architecture. For more information on modeling and managing ARIS objects and attributes, refer to ARIS online help and ARIS Method Help. If you have any questions about specific installations that you cannot perform yourself, please contact your local Software AG sales organization

(https://empower.softwareag.com/public_directory.asp).

Prerequisites

- You have the required license privileges and function privileges to use ARIS Architect. For detailed information, refer to the ARIS Administration online help and the ARIS Architect online help.
- The required processing activities are available in ARIS Architect.
- ARIS GDPR method enhancement filter is imported. For detailed information, refer to the ARIS Accelerators for GDPR Installation Guide.

Procedure

- Start ARIS Architect.
- 2. Click **ARIS** > **Explorer**. The **Explorer** tab opens.
- 3. Click Navigation in the bar panel if the Navigation bar is not activated yet.
- 4. Log in to the relevant database.
- 5. Press Ctrl + F, or click Find in the Start tab bar. The corresponding dialog opens.
- 6. Enter the search term and specify the relevant settings, then click **Start**. The search result is displayed as a list of links. Double-click an entry to open a model or display an object's properties, for example.
- 7. Manage the GDPR attributes (page 9) according to your specific requirements. You can modify the values, insert new attributes, or hide listed attributes. For example, use the **GDPR processing activity** attribute to specify (page 11) whether a process function is a processing activity (**true**) or not (**false**).

The relevant models, objects, and attributes for GDPR are available.

8.1 Relevant GDPR attributes

You can use the following GDPR object attributes. Only rarely are all object attributes used at the same time. Depending on your configuration, you use an attribute that is available at different objects, for example, Data privacy score, at one object only.

FUNCTION

Attribute	Use
GDPR processing activity	Specifies whether the function is a processing activity.
Description	Specifies the purpose of the (GDPR) processing activity.
Data privacy score	Specifies an estimated score on a predefined scale in order to qualify the data privacy of the hierarchy element. Example: The score derived from the Processing Activity Qualification questionnaire.
Data sensitivity	Indicates whether the data requires special handling. Options (default values): Public data Sensitive Very sensitive Highly sensitive Extremely sensitive

DATA/CLUSTER

Attribute	Use
Restriction level	Specifies the level of legal usage of the data. Options (default values):
	UnrestrictedPersonal data
	1 3.337.4.1 44.14
	 Sensitive personal data
	 Confidential data
Data privacy score	Specifies an estimated score on a predefined scale in order to qualify the data privacy of the hierarchy element. Example: The score derived from the Processing Activity Qualification questionnaire.

APPLICATION SYSTEM TYPE

Attribute	Use
Data sensitivity	Indicates whether the data requires special handling. Options (default values):
	Public data
	 Sensitive
	 Very sensitive
	Highly sensitive
	Extremely sensitive
GDPR qualification score	Indicates an estimated score on a predefined scale in order to qualify the hierarchy element. Example: A score derived from any application system qualification questionnaire.
GDPR risk relevance score	Indicates an estimated score on a predefined scale in order to qualify the risk relevance of the hierarchy element. Example: The score derived from the GDPR risk assessment.
Data privacy score	Specifies an estimated score on a predefined scale in order to qualify the data privacy of the hierarchy element. Example: The score derived from the Processing Activity Qualification questionnaire.

ORGANIZATIONAL UNIT

Attribute	Use	
Data protection officer	Displays the name and address of the data protection officer. be listed in the report. Must be listed in the report.	Must
Data protection representative	Displays the name and address of the data protection representative. Must be listed in the report.	

Connection	Use
is technically responsible for	Organizational unit acting as controller (page 38). (Connection between organizational unit and function.)
carries out	Organizational unit acting as processor (page 39). (Connection between organizational unit and function.)

For detailed information on GDPR modeling conventions, refer to the **GDPR Conventions for ARIS Accelerators** guide.

9 Identify processing activities and related assets

The documentation of processing activities (page 39) and their relationships to data, systems, as well as controller (page 38) and processor (page 39) entities is a key element of GDPR projects. To do so, use the following applications:

ARIS Architect

Use ARIS Architect if processing activities (functions) are already modeled in ARIS Architect and the users are familiar with ARIS Architect. To use ARIS Architect for modeling, you need extensive knowledge about modeling conventions and ARIS Method.

ARIS Connect

Use ARIS Connect if processing activities do not yet exist and/or the users are unfamiliar with ARIS Architect.

9.1 Specify processing activities in ARIS Architect

Use ARIS Architect to specify existing functions as processing activities.

Prerequisites

- You have the required license privileges and function privileges to use ARIS Architect. For detailed information, refer to the ARIS Administration online help and the ARIS Architect online help.
- The required processing activities are available in ARIS Architect.
- ARIS GDPR method enhancement filter is imported. For detailed information, refer to the ARIS Accelerators for GDPR Installation Guide.

Procedure

- 1. Start ARIS Architect.
- 2. Click **ARIS** > **Explorer**. The **Explorer** tab opens.
- 3. Click 🏶 **Navigation** in the bar panel if the **Navigation** bar is not activated yet.
- 4. Open the relevant model.
- 5. Click Properties in the bar panel if the Properties bar is not activated yet.
- 6. Select the function you want to specify as a processing activity.
- 7. Click More attributes in the Properties bar. The Insert attributes dialog opens.
- 8. Select the GDPR processing activity attribute in the attribute group Governance, Risk & Compliance > Compliance Management > Data protection regulation.
- 9. Click **OK**. From now on, the **GDPR processing activity** attribute is displayed in the attribute list of functions in the **Properties** bar.
- 10. Activate (♥) the GDPR processing activity attribute.
- 11. Click Close.

Your settings are saved.

Now you can use the **Properties** bar to easily activate the **GDPR processing activity** attribute for other functions.

9.2 Specify processing activities in ARIS Connect

Use ARIS Connect to specify existing functions as processing activities (page 39). For detailed information on editing in ARIS Connect, refer to the online help of ARIS Connect (**Which editing options are available?**).

Prerequisites

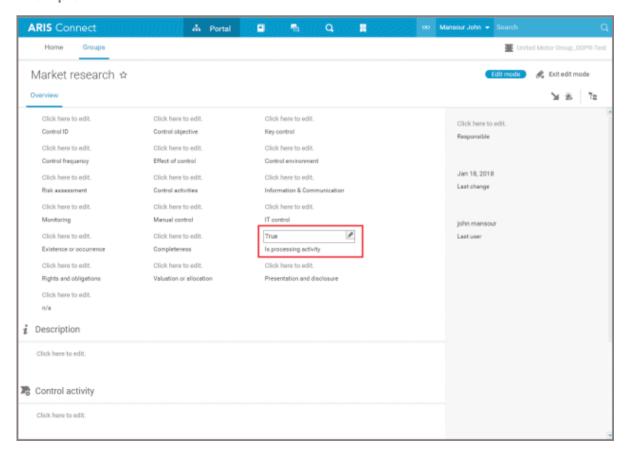
- You have the ARIS Connect Viewer > Contribution license privilege.
- The relevant objects are available in the ARIS database.
- The ARIS GDPR method enhancement filter is imported. For detailed information, refer to the ARIS Accelerators for GDPR Installation Guide.

Procedure

- Start ARIS Connect.
- 2. Search for the **Activity** object (function) that you want to specify as a processing activity. To do so, enter the object name to the **Search** field.
- 3. Click the relevant object in the list of results. The fact sheet is displayed.
- 4. Click **Edit** > **Contribute** if the edit mode is not activated yet.
- 5. Click the edit box of the **Is processing activity** attribute.
- 6. Select **True** and click to transfer your input.

The activity is specified as processing activity.

Example



9.3 Assign existing processing activities to Record of processing activities models

Use ARIS Connect to assign existing processing activities to **Record of processing activities** models.

Prerequisites

- You have the ARIS Connect Viewer > Contribution license privilege.
- The relevant objects are available in the ARIS database.
- ARIS GDPR method enhancement filter is imported. For detailed information, refer to the ARIS Accelerators for GDPR Installation Guide.
- At least one Record of processing activities model is available in the ARIS database.

Procedure

- 1. Start ARIS Connect.
- 2. Enter the name of the relevant **Record of processing activity** model to the **Q Search** field.
- 3. Click the relevant model in the list of results. The fact sheet is displayed.
- 4. Click **Edit** > **Contribute** if the edit mode is not activated yet.
- 5. Click **Add** above the **Processing activities** table.
- 6. Enter the name of the processing activity, select it from the search result, and click to transfer your input.

The processing activity is assigned to the **Record of processing activities** model.

9.4 Create new processing activities

Use ARIS Connect to create new processing activities.

Prerequisites

- You have the ARIS Connect Viewer > Contribution license privilege.
- The relevant objects are available in the ARIS database.
- ARIS GDPR method enhancement filter is imported. For detailed information, refer to the ARIS Accelerators for GDPR Installation Guide.
- At least one Record of processing activities model is available in the ARIS database.

Procedure

- 1. Start ARIS Connect.
- 2. Enter the name of the relevant **Record of processing activity** model to the **Search** field.
- 3. Click the relevant model in the list of results. The fact sheet is displayed.
- 4. Click **Edit** > **Contribute** if the edit mode is not activated yet.
- 5. Click **Add** above the **Processing activities** table.
- 6. Enter a name for the new processing activity, press **Enter**, and click to transfer your input. The processing activity is added to the **Processing activities** table.
- 7. Click the edit box of the **Is processing activity** attribute of the newly created processing activity.
- 8. Select **True** and click to transfer your input.
- 9. Click the edit box of the **Description** attribute of the newly created processing activity and enter a purpose. The other attributes are specified later (page 14).

The processing activity is created and the relevant attributes are specified.

9.5 Assign relevant assets to processing activities

Use ARIS Connect to assign relevant assets to processing activities, for example, data and IT systems.

Prerequisites

- You have the ARIS Connect Viewer > Contribution license privilege.
- The relevant objects are available in the ARIS database.
- ARIS GDPR method enhancement filter is imported. For detailed information, refer to the ARIS Accelerators for GDPR Installation Guide.
- At least one **Record of processing activities** model is available in the ARIS database.

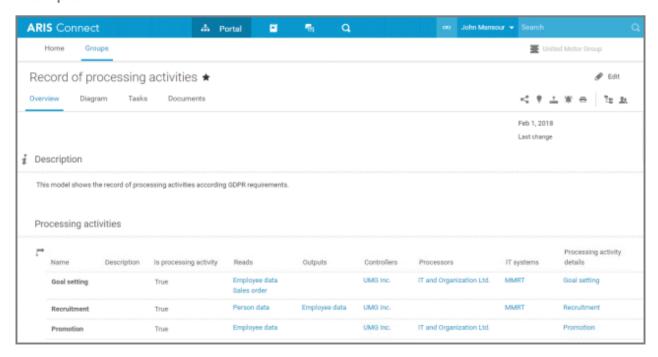
Procedure

- 1. Start ARIS Connect.
- 2. Enter the name of the relevant **Record of processing activity** model to the **Q Search** field.
- 3. Click the relevant model in the list of results. The fact sheet is displayed.
- 4. Click **Edit** > **Contribute** if the edit mode is not activated yet.
- 5. Assign the relevant processing activity (page 13) if it is not assigned yet.
- 6. In the **Processing activities** table, click the **Processing activity details** attribute of the relevant processing activity. The fact sheet is displayed.
- 7. Select the assets for the following attributes. To do so, click the edit box of the respective attribute, select the relevant name, click to transfer your input, then click **OK** to confirm your input.
 - a. **Reads**: Data that is read by the processing activity, for example, the customer address.
 - b. **Outputs**: Data that is created by the processing activity, for example, the sales quotation.
 - c. **Controllers**: (Legal) entity that is controller (page 38) of the processing activity, for example, the sales department.
 - d. **Processors**: (Legal) entity that is processor (page 39) of the processing activity, for example, the IT department.
 - e. **IT systems**: Application system on which the processing activity is executed, for example, SAP HR.

The assets are assigned to the processing activity.

For detailed information on contribution, refer to the ARIS Connect online help.

Example



10 Regulatory description of processing activities

The GDPR (page 38) requires a record of processing activities with all processing activities (page 39) of a legal entity (processor (page 39) or controller (page 38)) with a minimum set of details. The requirements for the record of processing activities can vary from country to country.

ARIS Accelerators for GDPR use the Survey Management of ARIS Risk & Compliance Manager to collect the relevant details for each processing activity in accordance with the segregation of duties principle and the audit trail of ARIS Risk & Compliance Manager. ARIS Accelerators for GDPR contains two questionnaires for describing (**Processing Activity Documentation**) and assessing (**Processing Activity Qualification**) the identified processing activities. These templates are meant to be initial questionnaire templates that can be customized. If you have any questions about specific installations that you cannot perform yourself, please contact your local Software AG sales organization (https://empower.softwareag.com/public_directory.asp).

The regulatory description is created with ARIS Risk & Compliance Manager Survey Management. For each processing activity, two steps must be performed:

- Create a processing activity description survey (page 16)
- Execute a processing activity description survey (page 18)

For detailed information on printing the **Record of processing activities**, refer to Generate the required internal and external reporting (page 26).

10.1 Create a processing activity description survey

Use ARIS Connect to prepare a processing activity description survey.

Prerequisites

- You have the ARIS Connect Viewer > Contribution license privilege.
- The relevant objects are available in a **Record of processing activities** model and assigned to the respective legal entity.
- The ARIS GDPR method enhancement filter is imported. For detailed information, refer to the ARIS Accelerators for GDPR Installation Guide.
- The GDPR questionnaires for describing (Processing Activity Documentation) and assessing (Processing Activity Qualification) are installed and adapted to your specific requirements. The ARCM Synchronization attribute of the Questionnaire template object must be true. For detailed information, refer to the ARIS Accelerators for GDPR Installation Guide.

Procedure

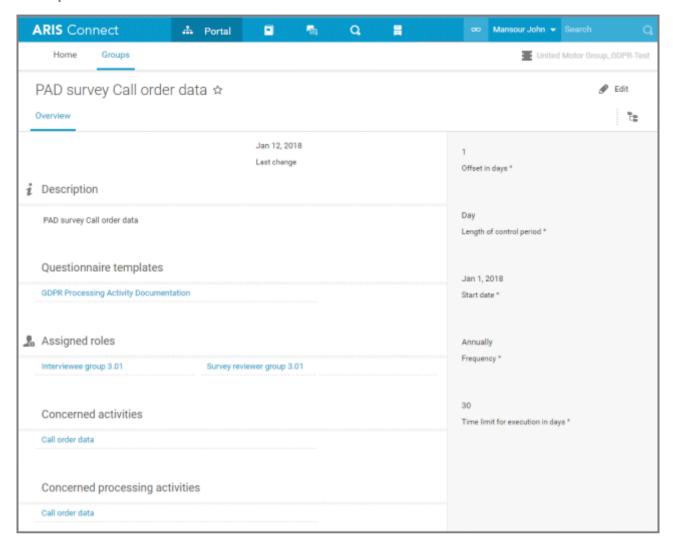
- 1. Start ARIS Connect.
- 2. Enter the name of the relevant **Record of processing activity** model to the **Q Search**
- 3. Click the model containing the relevant processing activity in the list of results. The fact sheet is displayed.
- 4. Click **Edit** > **Contribute** if the edit mode is not activated yet.

- 5. In the **Processing activities** table, click the **Processing activity details** attribute of the relevant processing activity. The fact sheet is displayed.
 - The link is only available if the assets are already assigned (page 14) to the processing activity.
- 6. Click the edit box of the Questionnaires attribute to add a new element.
- 7. Enter a name according to the respective processing activity and the description survey, for example, **Salary payment GDPR description**, click to transfer your input, then click **OK** to confirm your input. The **Questionnaires** attribute is created.
- 8. Click the **Questionnaires** attribute. The fact sheet is displayed.
- 9. Specify the relevant survey details. To do so, click the edit box of the respective attribute, enter the relevant information, click to transfer your input, and click **OK** to confirm your input (only for some attributes).
 - a. **Responsible**: Any user responsible for this survey.
 - b. **Description***): Short description of the survey.
 - c. Questionnaire templates*): The questionnaire template used in the survey. Use the GDPR Processing Activity Documentation questionnaire template for the standard package template.
 - Important: If a different template is used for the Record of processing activities report, you must use the attribute value **GDPR-PAD** for the **Identifier of the questionnaire template** object.
 - d. **Assigned roles***): The interviewee groups and the survey reviewer group in charge. You can assign multiple interviewee groups, but only one survey reviewer group.
 - e. **Offset in days***): The number of days by which the control period precedes the survey period. If no offset is specified for this survey, enter 1.
 - f. **Length of control period** *): The period the survey and the assigned questionnaires refer to. If no length of control period is specified for this survey, select **Day**.
 - g. **Start date***): The date the first survey and the assigned questionnaires were generated.
 - h. **End date**: The date when the survey task is completed.
 - i. **Frequency***): The interval at which the survey and the assigned questionnaires are generated.
 - j. **Time limit for execution in days***): The number of days available to the interviewee for the completion of the questionnaire. It defines the completion date by which the survey must be completed.
 - *) = Mandatory

The processing activity description survey is created.

For detailed information, refer to the **ARCM - Survey Management Conventions** manual and the ARIS Risk & Compliance Manager online help.

Example



10.2 Execute a processing activity description survey

Once the preparation of a processing activity description survey is complete, the data can be synchronized to ARIS Risk & Compliance Manager. For detailed information on synchronization, contact your ARIS Risk & Compliance Manager administrator.

As soon as the data is available in ARIS Risk & Compliance Manager and the start date is reached, the survey is automatically generated in ARIS Risk & Compliance Manager. The interviewees are informed that new surveys are available for editing in ARIS Risk & Compliance Manager. For detailed information on survey management and questionnaires, refer to the ARIS Risk & Compliance Manager online help.

11 Regulatory (pre-DPIA) qualification of processing activities

The GDPR regulation requires a risk assessment for all processing activities in order to decide if a Data Protection Impact Analysis (DPIA) is necessary. In order to perform a risk assessment, a detailed qualification of the processing activity is necessary. The requirements for this qualification can vary from country to country.

ARIS Accelerators for GDPR uses the Survey Management component of ARIS Risk & Compliance Manager to qualify each processing activity, in accordance with the segregation of duties principle and the audit trail of ARIS Risk & Compliance Manager. ARIS Accelerators for GDPR contains a questionnaire (**Processing Activity Qualification**) for assessing the identified processing activities. This template is based on the recommendations of the ARTICLE 29 DATA PROTECTION WORKING PARTY (Guidelines on Data Protection Impact Assessment (DPIA) and determining whether processing is likely to result in a high risk for the purposes of Regulation 2016/679). For each processing activity, the actual score is calculated by adding up the answer values of the selected answers. If the actual score exceeds the target score (default set to 10, equaling two risky aspects), the processing activity concerned can involve a high risk.

This template is meant to be an initial questionnaire template that can be customized. If you have any questions about specific installations that you cannot perform yourself, please contact your local Software AG sales organization (https://empower.softwareag.com/public_directory.asp).

The creation of the qualification with the ARIS Risk & Compliance Manager Survey Management is performed in two steps for each processing activity:

- Create a processing activity description survey (page 19)
- Execute a processing activity description survey (page 22)

11.1 Create a processing activity qualification survey

Use ARIS Connect to prepare a processing activity qualification survey

Prerequisites

- You have the ARIS Connect Viewer > Contribution license privilege.
- The relevant objects are available in a **Record of processing activities** model and assigned to the respective legal entity.
- The ARIS GDPR method enhancement filter is imported. For detailed information, refer to the ARIS Accelerators for GDPR Installation Guide.
- The GDPR questionnaires for describing (Processing Activity Documentation) and assessing (Processing Activity Qualification) are installed and adapted to your specific requirements. The ARCM Synchronization attribute of the Questionnaire template object must be true. For detailed information, refer to the ARIS Accelerators for GDPR Installation Guide.

Procedure

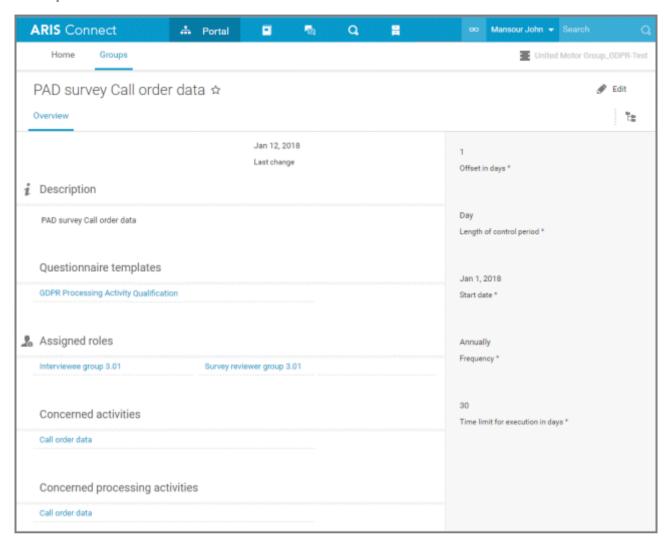
1. Start ARIS Connect.

- 2. Enter the name of the relevant **Record of processing activity** model to the **Search** field.
- 3. Click the model containing the relevant processing activity in the list of results. The fact sheet is displayed.
- 4. Click **Edit** > **Contribute** if the edit mode is not activated yet.
- In the Processing activities table, click the Processing activity details attribute of the relevant processing activity. The fact sheet is displayed.
 - The link is only available if the assets are already assigned (page 14) to the processing activity.
- 6. Click the edit box of the **Questionnaires** attribute to add a new element.
- 7. Enter a name according to the respective processing activity and the description survey, for example, Salary payment GDPR qualification, click to transfer your input, then click OK to confirm your input. The Questionnaires attribute is created.
- 8. Click the **Questionnaires** attribute. The fact sheet is displayed.
- 9. Specify the relevant survey details. To do so, click the edit box of the respective attribute, enter the relevant information, click to transfer your input, and click **OK** to confirm your input (only for some attributes).
 - a. **Responsible**: Any user responsible for this survey.
 - b. **Description***): Short description of the survey.
 - c. Questionnaire templates*): The questionnaire template used in the survey. Use the GDPR Processing Activity Qualification questionnaire template for the standard package template.
 - d. **Assigned roles***): The interviewee groups and the survey reviewer group in charge. You can assign multiple interviewee groups, but only one survey reviewer group.
 - e. **Offset in days***): The number of days by which the control period precedes the survey period. If no offset is specified for this survey, enter **1**.
 - f. **Length of control period** *): The period the survey and the assigned questionnaires refer to. If no length of control period is specified for this survey, select **Day**.
 - g. **Start date***): The date the first survey and the assigned questionnaires were generated.
 - h. **End date**: The date when the survey task is completed.
 - Frequency*): The interval at which the survey and the assigned questionnaires are generated.
 - j. **Time limit for execution in days***): The number of days available to the interviewee for the completion of the questionnaire. It defines the completion date by which the survey must be completed.
 - *) = Mandatory

The processing activity qualification survey is created.

For detailed information, refer to the **ARCM - Survey Management Conventions** manual and the ARIS Risk & Compliance Manager online help.

Example



11.2 Execute a processing activity qualification survey

Once the preparation of a processing activity qualification survey is complete, the data can be synchronized to ARIS Risk & Compliance Manager. For detailed information on synchronization, contact your ARIS Risk & Compliance Manager administrator.

As soon as the data is available in ARIS Risk & Compliance Manager and the start date is reached, the survey is automatically generated in ARIS Risk & Compliance Manager. The interviewees are informed that new surveys are available for editing in ARIS Risk & Compliance Manager. For detailed information on survey management and questionnaires, refer to the ARIS Risk & Compliance Manager online help.

12 Risk assessment of processing activities

The GDPR regulation requires a risk assessment for all processing activities in order to decide if a Data Protection Impact Analysis (DPIA) is necessary, potentially based, among other things, on the score of the detailed qualification of the processing activity (see before chapter).

Requirements for this qualification can vary from country to country. The Risk Management of ARIS Risk & Compliance Manager is used to assess the risk of each processing activity. This GRC workflow is audit-secure and includes the segregation of duties. It is recommended to create a GDPR impact type (risk impact type) for such assessments. The impact type can be customized. For detailed information, refer to the ARIS Accelerators for GDPR Installation Guide. If you have any questions about specific installations that you cannot perform yourself, please contact your local Software AG sales organization (https://empower.softwareag.com/public_directory.asp).

The assessment of risks with ARIS Risk & Compliance Manager Risk Management is performed in two steps for each processing activity:

- Create a processing activity risk assessment (page 23)
- Execute a processing activity risk assessment (page 25)

12.1 Create a processing activity risk assessment

Use ARIS Connect to create a processing activity risk assessment.

Prerequisites

- You have the ARIS Connect Viewer > Contribution license privilege.
- The relevant objects are available in a Record of processing activities model and assigned to the respective legal entity.
- The ARIS GDPR method enhancement filter is imported. For detailed information, refer to the ARIS Accelerators for GDPR Installation Guide.
- The GDPR impact type is created in ARIS Risk & Compliance Manager. For detailed information, refer to ARIS Accelerators for GDPR Installations Guide > Create a GDPR impact type in ARIS Risk & Compliance Manager.

Procedure

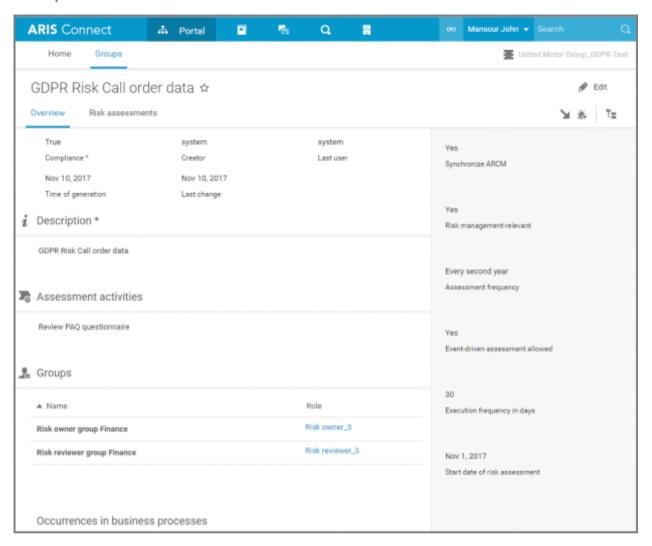
- Start ARIS Connect.
- 2. Enter the name of the relevant **Record of processing activity** model to the **Search** field.
- 3. Click the relevant model in the list of results. The fact sheet is displayed.
- 4. Click **Edit** > **Contribute** if the edit mode is not activated yet.
- 5. In the **Processing activities** table, click the **Processing activity details** attribute of the relevant processing activity. The fact sheet is displayed.
 - The link is only available if the assets are already assigned (page 14) to the processing activity.
- 6. Click the edit box of the **Risks** attribute to add a new element.

- 7. Enter a name according to the respective processing activity and the risk type, for example, Salary payment GDPR risk, click to transfer your input, then click OK to confirm your input.
- 8. Click the **Risks** attribute. The fact sheet is displayed.
- 9. Specify the relevant risk details. To do so, click the edit box of the respective attribute, enter the relevant information, click to transfer your input, and click **OK** to confirm your input (only for some attributes).
 - a. **Responsible**: Any user responsible for this risk.
 - b. **Description***): Short description of the survey.
 - c. Compliance*): Activate true for GDPR risks
 - d. **Assessment activities***): Description of the activities to be performed during risk assessment.
 - e. **Groups***): The risk owner group and the risk reviewer group in charge.
 - f. Synchronize ARCM*): Activate Yes.
 - g. Risk management-relevant*): Activate Yes.
 - h. **Assessment frequency***): The interval at which risk assessments are automatically generated.
 - i. **Event-driven assessment allowed**: Indicates whether risk assessments can be generated not only automatically, but also manually.
 - j. **Execution frequency in days***): The number of days available to the risk owner to assess the risk.
 - k. **Start date of risk assessment***): The date the first risk assessment is generated.
 - I. End date of risk assessment: The date when the risk assessment is completed.
 - *) = Mandatory

The risk assessment is created.

For detailed information, refer to the **ARCM - Risk-based Test and Sign-off Management Conventions** manual and the ARIS Risk & Compliance Manager online help.

Example



12.2 Execution of a processing activity risk assessment

Once the preparation of a processing activity risk assessment is complete, the data can be synchronized to ARIS Risk & Compliance Manager. For detailed information on synchronization, contact your ARIS Risk & Compliance Manager administrator.

As soon as the data is available in ARIS Risk & Compliance Manager and the start date is reached, the risk assessment is automatically generated in ARIS Risk & Compliance Manager. The risk owners are informed that new risk assessments are available for editing in ARIS Risk & Compliance Manager. For detailed information on risk assessment, refer to the ARIS Risk & Compliance Manager online help.

13 Generate required internal and external reports

In the context of GDPR and the related internal analysis and reporting tasks, several reports are required. ARIS Accelerators for GDPR contains the following reports:

- Output record of processing activities report (page 26)
- Output GDPR management report (page 26)
- Output extended GDPR management report (page 27)
- Output survey intelligence report (page 27)
- Data allocation matrix (page 28)

To run reports in ARIS Risk & Compliance Manager, open the relevant form or list and click Generate report. To run reports in ARIS Architect, click Start report on the Evaluate tab bar. For detailed information on generating reports, refer to the ARIS and the ARIS Risk & Compliance Manager online help.

13.1 Output record of processing activities report

APPLICATION

ARIS Risk & Compliance Manager

USE

Outputs the formal record of processing activities for presentation to the supervisory authority. This report is only available if the ARIS accelerators for GDPR reports were imported.

CONTEXT (DEFAULT)

Organization hierarchy elements in ARIS Risk & Compliance Manager.

OUTPUT FORMAT

PDF

13.2 Output GDPR management report

APPLICATION

ARIS Risk & Compliance Manager

USE

Outputs the graphical model that describes a processing activity and also includes all attributes of the objects contained in the model.

This report is only available if the ARIS accelerators for GDPR reports were imported.

CONTEXT (DEFAULT)

Organization, **Process**, or **Application system type** hierarchy elements in ARIS Risk & Compliance Manager.

OUTPUT FORMAT

PDF

13.3 Output extended GDPR management report

APPLICATION

ARIS Risk & Compliance Manager

USE

Outputs the graphical model that describes a processing activity and also includes all attributes of the objects contained in the model as well as all risk assessments, incidents, and issues related to the processing activity.

This report is only available if the ARIS accelerators for GDPR reports were imported.

CONTEXT (DEFAULT)

Organization, **Process**, or **Application system type** hierarchy elements in ARIS Risk & Compliance Manager.

OUTPUT FORMAT

PDF

13.4 Output survey intelligence report

APPLICATION

ARIS Risk & Compliance Manager

USE

Outputs a list of all questionnaires including questions and answers.

This report is only available if the ARIS accelerators for GDPR reports were imported.

CONTEXT (DEFAULT)

Survey lists and objects as well as **Questionnaire template** lists and objects in ARIS Risk & Compliance Manager.

OUTPUT FORMAT

XLS

13.5 Data allocation matrix

APPLICATION

ARIS Architect

USE

Outputs a matrix of data objects and their relations based on models describing processing activities

This report is only available if the ARIS accelerators for GDPR reports were imported.

CONTEXT

Group

CATEGORY

ARIS Risk & Compliance Manager

OUTPUT FORMAT

XLS

14 Monitor related indicators in dashboards

In the context of GDPR and the related internal project several indicators are of special interest. You can monitor two ARIS Aware dashboards that are contained in the ARIS Accelerators for GDPR package: GDPR - Overview (page 29) and GDPR - Workflow. (page 34)

Procedure

- 1. Start ARIS Connect.
- Search for the relevant Organizational element. To do so, enter the name in the Search field.
- 3. Click the relevant element in the list of results. The fact sheet is displayed.
- 4. Click **Dashboards**. The **GDPR Overview** dashboard is displayed.
- 5. Select an environment from ARIS Risk & Compliance Manager for the workflow indicators.
- 6. Click **GDPR Workflow**. The dashboard is displayed.
- 7. Select an environment from ARIS Risk & Compliance Manager for the workflow indicators.

The dashboards are displayed for monitoring. For detailed information on ARIS Aware dashboards, refer to the ARIS Connect online help.

14.1 GDPR - Overview

AVAILABILITY

The **GDPR - Overview** dashboard is displayed (page 29) in fact sheets of organizational units in ARIS Connect.

CHARTS

ACTIVITIES RELATED TO THE UNIT

Shows the number of processing activities connected to the selected organizational unit.

Data source

ARIS Architect: GDPR - Processing Activities OrgUnits query

Configurable

Yes

Data feed

GDPR - TRANSFORM - Activities related to the unit

GDPR - LOAD - ARIS Processing Activities for Overview chart Activities related to the unit

Calculation

Counts in the ARIS database the number of processing activities. Only the processing activities connected to the selected organizational unit are included in the calculation.

NEW ACTIVITIES RELATED TO THE UNIT

Shows the number of new processing activities, connected to the selected organizational unit, that were created during the period specified in **Period in days**.

Data source

ARIS Architect: GDPR - Processing Activities OrgUnits query

Configurable

Yes

Data feed

GDPR - TRANSFORM - New activities related to the unit

GDPR - LOAD - ARIS Processing Activities for Overview chart Activities related to the unit

Calculation

Counts in the ARIS database the number of processing activities with creation date during the specified period. Only the processing activities connected to the selected organizational unit are included in the calculation.

ACTIVITIES WITH NEW INCIDENTS

Shows the number of processing activities that are connected to the selected organizational unit, and that are connected to incidents with occurrence date during the period specified in **Period in days**.

Data source

ARIS Risk & Compliance Manager: GDPR specific (internal) query

Configurable

No

Data feed

GDPR - TRANSFORM - Activities with new incidents

GDPR - LOAD - ARIS Risk & Compliance Manager - incident2processActivity (Contr, Proc)

Calculation

Counts in the ARIS Risk & Compliance Manager database the number of processing activities that are connected to incidents with occurrence date during the specified period. Only the processing activities connected to the selected organizational unit are included in the calculation.

TOTAL GDPR INCIDENTS FOR THE UNIT

Shows the total number of incidents that were created in the context of processing activities connected to the selected organizational unit.

Data source

ARIS Risk & Compliance Manager: GDPR specific (internal) query

Configurable

No

Data feed

GDPR - TRANSFORM - Total GDPR incidents for the unit

GDPR - LOAD - ARCM - incident2processActivity (Contr, Proc)

Calculation

Counts in the ARIS Risk & Compliance Manager database the number of incidents that are connected to processing activities. Only the processing activities connected to the selected organizational unit are included in the calculation.

NEW ACTIVITIES OVER TIME

Shows the development of the number of processing activities created during the last six months, that are connected to the selected organizational unit.

Data source

ARIS Architect: GDPR - Processing Activities OrgUnits query

Configurable

Yes

Data feed

GDPR - TRANSFORM - New activities over time

GDPR - TRANSFORM - Last six months

GDPR - LOAD - ARIS Processing Activities for Overview chart Activities related to the unit

Calculation

Counts in the ARIS database the number of processing activities with creation date during the last six months. Only the processing activities connected to the selected organizational unit are included in the calculation.

NEW INCIDENTS OVER TIME

Shows the number of incidents of the last six month in the context of processing activities connected to the selected organizational unit.

Data source

ARIS Risk & Compliance Manager: GDPR specific (internal) query

Configurable

Nο

Data feed

GDPR - TRANSFORM - New incidents over time

GDPR - TRANSFORM - Last six months

GDPR - LOAD - ARCM - incident2processActivity (Contr, Proc)

Calculation

Counts in the ARIS Risk & Compliance Manager database the number of incidents with occurrence date during the last six months that are connected to processing activities. Only the processing activities connected to the selected organizational unit are included in the calculation.

ACTIVITY OVERVIEW

Shows a list of processing activities that are connected to the selected organizational unit, and the GDPR (page 38) role connected to each processing activity.

Data source

ARIS Architect: GDPR - Processing Activities OrgUnits query

Configurable

Yes

Data feed

GDPR - LOAD - ARIS Processing Activities for Overview chart Activities related to the unit

Calculation

Collects in the ARIS database the processing activities of each connection type. Only the processing activities connected to the selected organizational unit are included in the calculation.

ACTIVITIES WITH NEW INCIDENTS OVER TIME

Shows the number of processing activities that are connected to the selected organizational unit, and that are connected to new incidents occurred during the last six months.

Data source

ARIS Risk & Compliance Manager: GDPR specific (internal) query

Configurable

No

Data feed

GDPR - TRANSFORM - Activities with new incidents over time

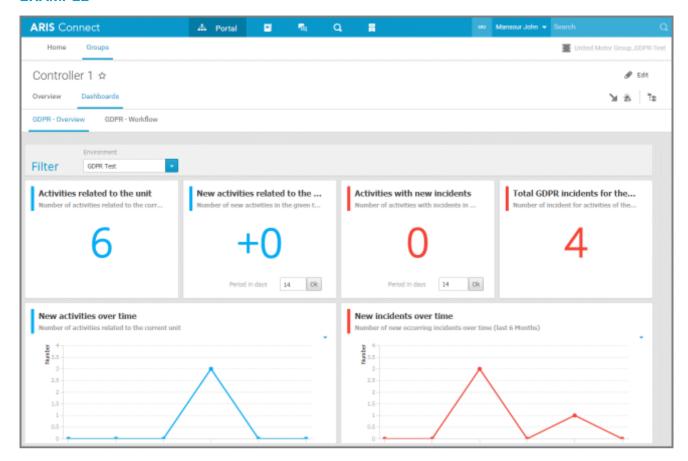
GDPR - TRANSFORM - Last six months

GDPR - LOAD - ARCM - incident2processActivity (Contr, Proc)

Calculation

Counts in the ARIS Risk & Compliance Manager database the number of processing activities that are connected to incidents with occurrence date during the last six months. Only the processing activities connected to the selected organizational unit are included in the calculation.

EXAMPLE



14.2 GDPR – Workflow

AVAILABILITY

The **GDPR - Workflow** dashboard is displayed (page 29) in fact sheets of organizational units in ARIS Connect. For detailed information on data sources and calculation of ARIS Aware dashboards, refer to the ARIS Connect online help.

CHARTS

OUESTIONNAIRE ASSIGNMENT PROGRESS

Shows the distribution of processing activities with and without connection to survey tasks that are connected to the selected questionnaire template.

Data source

ARIS Architect: **GDPR - Processing Activities OrgUnits, GDPR - Processing Activities Surveys QuestTemps** queries

Configurable

Yes

Data feed

GDPR - TRANSFORM - Questionnaire assignment progress 2

GDPR - TRANSFORM - Questionnaire assignment progress 1

GDPR - LOAD - ARIS - Processing Activities OrgUnits

GDPR - LOAD - ARIS - Processing Activities Surveys QuestTemps

Calculation

Counts in the ARIS database the number of processing activities that are connected to a survey task that is connected to the selected questionnaire template. Only the processing activities connected to the selected organizational unit are included in the calculation.

SURVEY TASK EXECUTION PROGRESS

Shows the distribution of survey tasks (based on the data of the **Questionnaire assignment progress** chart) with and without generated surveys.

Data source

ARIS Risk & Compliance Manager: GDPR specific (internal) query

Configurable

No

Data feed

GDPR - TRANSFORM - Survey task execution progress 2

GDPR - TRANSFORM - Survey task execution progress 1

GDPR - TRANSFORM - Questionnaire assignment progress 1

GDPR - LOAD - ARIS - Processing Activities OrgUnits

GDPR - LOAD - ARIS - Processing Activities Surveys QuestTemps

GDPR - LOAD - ARIS Risk & Compliance Manager - surveyTask2processActivity (Contr, Proc)

Calculation

Counts in the ARIS Risk & Compliance Manager database the number of surveys that were generated with the survey tasks from the **Questionnaire assignment progress** chart. Only the processing activities connected to the selected organizational unit are included in the calculation.

SURVEY STATUS PROGRESS

Shows the distribution of generated surveys with their status based on the data of the **Survey task execution progress** chart.

Data source

ARIS Risk & Compliance Manager: GDPR specific (internal) guery

Configurable

No

Data feed

GDPR - TRANSFORM - Survey task execution progress 2

GDPR - TRANSFORM - Survey task execution progress 1

GDPR - TRANSFORM - Questionnaire assignment progress 1

GDPR - LOAD - ARIS - Processing Activities OrgUnits

GDPR - LOAD - ARIS- Processing Activities Surveys QuestTemps

GDPR - LOAD - ARIS Risk & Compliance Manager - surveyTask2processActivity (Contr, Proc)

Calculation

Counts in the ARIS Risk & Compliance Manager database the number of surveys in each survey status that were generated with the survey tasks from the **Questionnaire assignment progress** chart. Only the survey tasks connected to processing activities that are connected to the selected organizational unit are included in the calculation.

RISK ASSIGNMENT PROGRESS

Shows the distribution of processing activities with and without connected risks.

Data source

ARIS Architect: **GDPR - Processing Activities OrgUnits, GDPR - Processing Activities Risks** query

Configurable

Yes

Data feed

GDPR - TRANSFORM - Risk assignment progress 2

GDPR - TRANSFORM - Risk assignment progress 1

GDPR - LOAD - ARIS - Risk assignment progress

Calculation

Counts in ARIS database the number of processing activities that are connected to a risk. Only the processing activities connected to the selected organizational unit are included in the calculation.

RISK ASSESSMENT CREATION PROGRESS

Shows the distribution of risk assessments (generated or not yet generated) based on the data of the **Risk assignment progress** chart.

Data source

ARIS Risk & Compliance Manager: GDPR specific (internal) query

Configurable

No

Data feed

GDPR - TRANSFORM - Risk assessment creation progress

GDPR - TRANSFORM - Risk assignment progress 2

GDPR - TRANSFORM - Risk assignment progress 1

GDPR - LOAD - ARIS - Risk assignment progress

GDPR - LOAD - ARIS Risk & Compliance Manager - riskAssessment2processActivity

Calculation

Counts in the ARIS Risk & Compliance Manager database the number of processing activities that are connected to risks that are at least connected to one generated risk assessment. Only the processing activities connected to the selected organizational unit are included in the calculation.

RISK ASSESSMENT WORKFLOW PROGRESS

Shows the distribution of risk assessments with their risk owner status based on the data of the **Risk assessment creation progress** chart.

Data source

ARIS Risk & Compliance Manager: GDPR specific (internal) query

Configurable

No

Data feed

GDPR - TRANSFORM - Risk assessment workflow progress

GDPR - TRANSFORM - Risk assessment creation progress

GDPR - TRANSFORM - Risk assignment progress 2

GDPR - TRANSFORM - Risk assignment progress 1

GDPR - LOAD - ARIS - Risk assignment progress

GDPR - LOAD - ARIS Risk & Compliance Manager - riskAssessment2processActivity

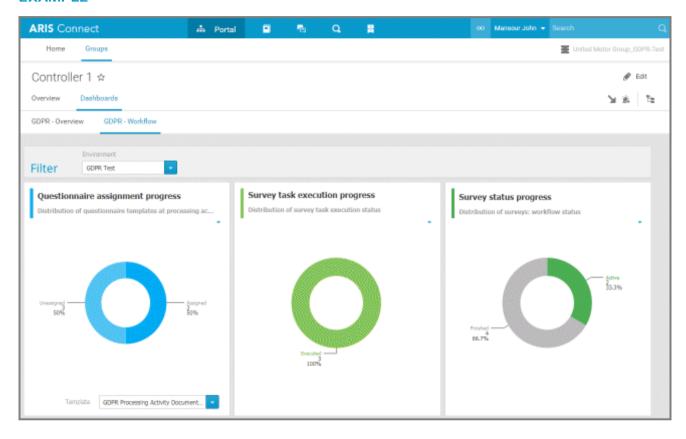
Calculation

Counts in the ARIS Risk & Compliance Manager database the number of processing activities that are connected to a risk object. From this quantity, the number of risk assessments with their risk

owner status are taken into account. Only the processing activities connected to the selected organizational unit are included in the calculation.

For detailed information on Survey Management and Risk Management refer to the ARIS Risk & Compliance Manager online help. For detailed information on dashboards, refer to the ARIS Aware online help.

EXAMPLE



15 Glossary

C

Controller

Determines the purpose and means of processing personal data. (Role according to article 4 of the GDPR (page 38).)

D

Dashboard

A dashboard is an interactive application that merges, combines, and clearly visualizes data from different data sources. The data can come from different sources and is combined together. Possible data sources include Excel or CSV files, reports from ERP or CRM systems, requests from data warehouses, or freely available machine-readable data from the Internet. Dashboards are made up of individual graphic components (for example, business graphics, tables, maps, etc.), which obtain their data from data feeds and display it. The individual display components can be linked to one another so that the results displayed can be interactively filtered and therefore intuitively analyzed.

Data protection officer

Informs and advises the controller (page 38)/processor (page 39) of their obligations, monitors compliance, provides advice, and acts as the contact for the supervisory authority.

Data protection representative

Represents the controller (page 38)/processor (page 39) with regard to their respective obligations under GDPR.

G

GDPR

The General Data Protection Regulation (GDPR) protects the rights of individuals' personal data within the European Union. It also regulates the export of personal data outside the EU. GDPR is a regulation by the European Parliament, the Council of the European Union, and the European Commission.

Incident

In the Governance, Risk & Compliance environment an incident is the trigger for a loss.

Issue Management

The Issue Management of ARIS Risk & Compliance Manager enables processes and objects, for example, risks, controls, and policies, to be combined in an issue across different contexts, so that it can refer to different situations or assign tasks.

Unlike deficiencies, issues are one-off problems that occur in the business environment. Issue Management allows you to document, analyze, and monitor identified issues for the purpose of crisis prevention. The goal is to make problematic issues known in time and resolve them.

P

Processing activity

A processing activity is any operation which is performed on individuals' personal data, such as collection, recording, disclosure by transmission, and therefore is subject to the General Data Protection Regulation (GDPR (page 38)).

Processing activities and associated information are modeled in **Processing activity description diagram** models and **Record of processing activities** models in ARIS Architect.

For detailed information, refer to the **ARIS Risk & Compliance Manager - Data Protection Management** guide.

Processor

Processes personal data on behalf of the controller (page 38). (Role according to article 4 of the GDPR (page 38).)

S

Single sign-on (SSO)

With **SSO** or **single sign-on** the user only needs to authenticate himself once with his user name and password to access all services, programs and computers without logging in again.

If services, programs, and computers request a new authentication when accessed by the user the authentication is carried out by the underlying SSO mechanism.

т

Tenant

A tenant is a container providing its own ARIS Administration and ARIS data set, such as configuration, ARIS method, databases, scripts, etc.

Each tenant provides users with a particular set of functionalities and specific data depending on their licenses and privileges.

16 Disclaimer

ARIS products are intended and developed for use by persons. Automated processes, such as the generation of content and the import of objects/artifacts via interfaces, can lead to an outsized amount of data, and their execution may exceed processing capacities and physical limits. For example, processing capacities are exceeded if models and diagrams transcend the size of the modeling area or an extremely high number of processing operations is started simultaneously. Physical limits may be exceeded if the memory available is not sufficient for the execution of operations or the storage of data.

Proper operation of ARIS products requires the availability of a reliable and fast network connection. Networks with insufficient response time will reduce system performance and may cause timeouts.

If ARIS products are used in a virtual environment, sufficient resources must be available there in order to avoid the risk of overbooking.

The system was tested using scenarios that included 100,000 groups (folders), 100,000 users, and 1,000,000 modeling artifacts. It supports a modeling area of 25 square meters.

If projects or repositories are larger than the maximum size allowed, a powerful functionality is available to break them down into smaller, more manageable parts.

Some restrictions may apply when working with process administration, ARIS Administration, ARIS document storage, and ARIS Process Board, and when generating executable processes. Process Governance has been tested and approved for 1000 parallel process instances. However, the number may vary depending on process complexity, for example, if custom reports are integrated.

ARIS document storage was tested with 40.000 documents. We recommend monitoring the number and overall size of stored documents and archiving some documents if needed.

17 Support

ON THE WEB

Open Empower (https://empower.softwareag.com/) to get support.

A valid support contract allows you to access the solution database.

If you have any questions on specific installations that you cannot perform yourself, please contact your local Software AG sales organization.

TELEFONISCH

If you have a valid support contract, you can contact Global Support ARIS at:

+800 ARISHELP

The plus sign stands for the prefix required in a given country to dial an international connection.

Example for dialing within Germany with a direct extension line: 00 800 2747 4357

If this number is not supported by your telephone provider, please refer to Empower https://empower.softwareag.com/public_directory.asp.