



---

# Welcome to the 16TH Annual **EMUG** **BOSTON**

---

## #EMUG2018

 Editorial Manager®  ProduXion Manager®

---



What you  
know

should already  
about the GDPR

**Sally Ubnoske**

Senior Business Systems Analyst

[subnoske@ariessys.com](mailto:subnoske@ariessys.com)



# EU General Data Protection Regulation

# GDPR Summary

- The GDPR came into force on *May 25, 2018*
- The European Parliament, the European Council, and the European Commission intend to strengthen and unify data protection for individuals within the European Union (EU)
- The GDPR also addresses the export of personal data outside of the EU
- The primary objective is to return control of personal data to citizens and to simplify the regulatory environment of international business
- It applies to any entity processing data about EU residents, wherever that entity is located in the world

# Data Protection Directive: Key Changes

- Applies to all companies processing the personal data of EU residents regardless of the company's location
- Organizations in breach of GDPR can be fined up to 4% of annual global turnover or €20 million (whichever is greater)
- Conditions of consent have been strengthened – companies can no longer use illegible terms and conditions full of legalese
- Consent must be clear and distinguishable and provided in clear and easily accessible form
- Consent must be as easy to withdraw as to give
- Data Controllers must notify supervisory authorities / data subjects within 72 hours of a data breach

# Data Controller vs. Data Processor

- Data Controller – the entity that determines the purposes, conditions, and means of processing personal data
- Data Processor – processes personal data on behalf of the Data Controller
- Under these terms,
  - The **Publisher, Society, or Journal** is the *Data Controller* (Journal staff implement Data Controller policies)
  - **Aries Systems Corporation** is a *Data Processor*

# Personal Data vs. Sensitive Personal Data

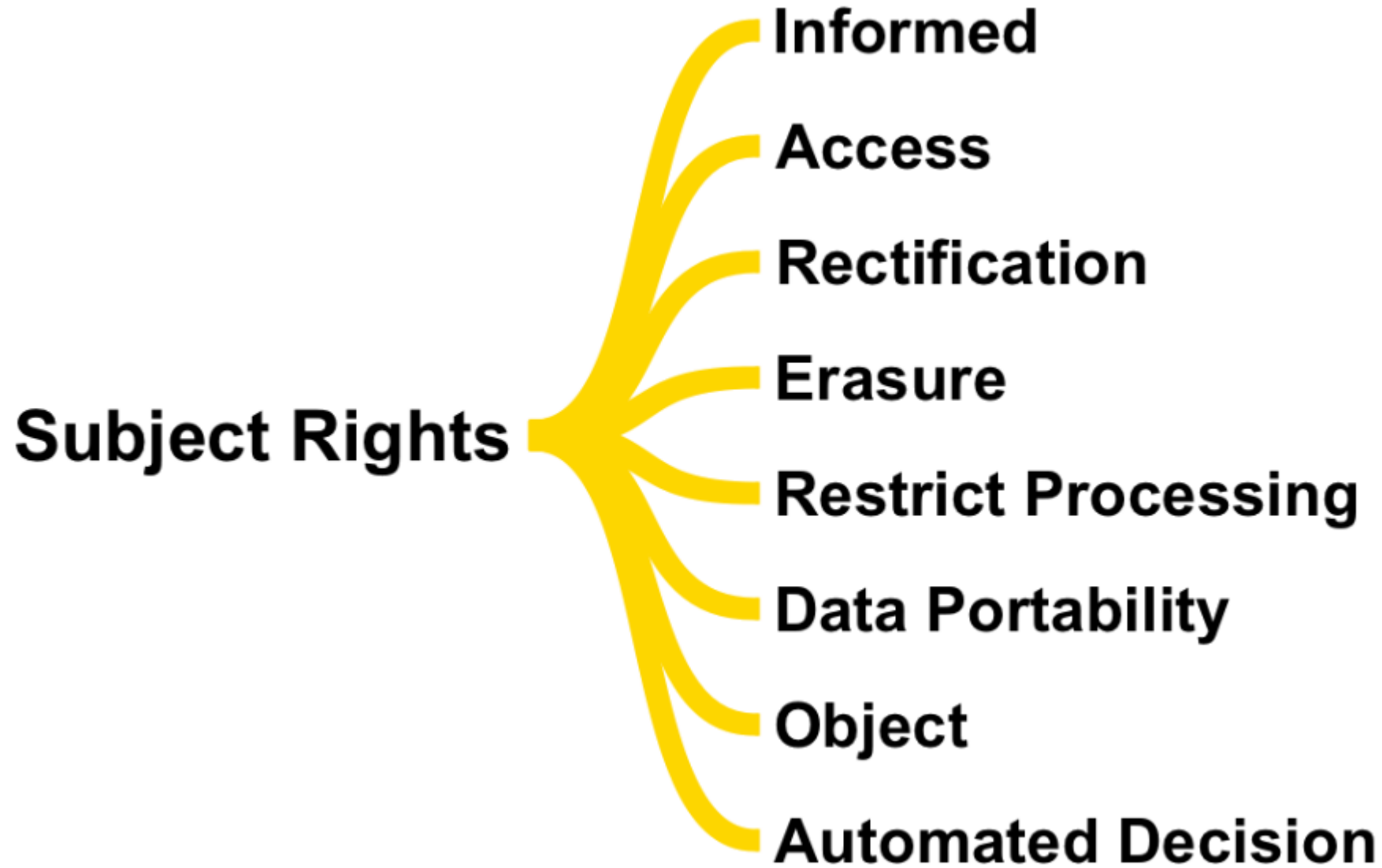


- Personal Data
  - Any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier
- Sensitive Personal Data
  - The special categories include medical or genetic data, and biometric data where processed to uniquely identify an individual
  - Additional safeguards are required for such data

# Personal Data Must Be . . .

- Processed lawfully, fairly and in a transparent manner in relation to individuals
- Collected for specified, explicit and legitimate purposes
- Adequate, relevant and limited to what is necessary
- Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the data are processed
- Processed in a manner that ensures appropriate security of the personal data using appropriate technical or organizational measures (Aries, as Data Processor, provides this while in EM)





<sup>1</sup> Schmidt, I. (2018, June 01). IVAN SCHMIDT. Retrieved from <https://www.ivanschmidt.com/articles/show/navigating-gdpr---237261>

# Right to be Informed / Access to Data

- Data subjects have the right to obtain confirmation from the Data Controller as to whether personal data about them is being processed, where, and for what purpose
- The Data Controller shall provide a copy of the personal data, free of charge, in an electronic format
  - GDE and reports allow this via tab-delimited text formats
- This is a dramatic shift to data transparency and empowerment of data subjects



# Clear Consent



- Consent should be given by a clear affirmative act establishing a freely given, specific, informed and unambiguous indication of the data subject's agreement to the processing of personal data relating to him or her
- Consent can be given by a written statement, including by electronic means, or an oral statement
  - This may include ticking a box when visiting an internet website
- The data subject shall have the right to withdraw his or her consent at any time – it shall be as easy to withdraw consent as to give it

# Right to be Forgotten / Data Erasure

- Entitles the data subject to have the data controller erase or anonymize his/her personal data and cease further dissemination of the data
- May require that third parties halt processing of the data
- The conditions (per Article 17) include that the data is no longer relevant to its original purpose
- Data Controllers are required to compare data subjects' rights to the public interest in the availability of the data
  - Author and Reviewer details may need to be retained for use in potential scientific fraud cases

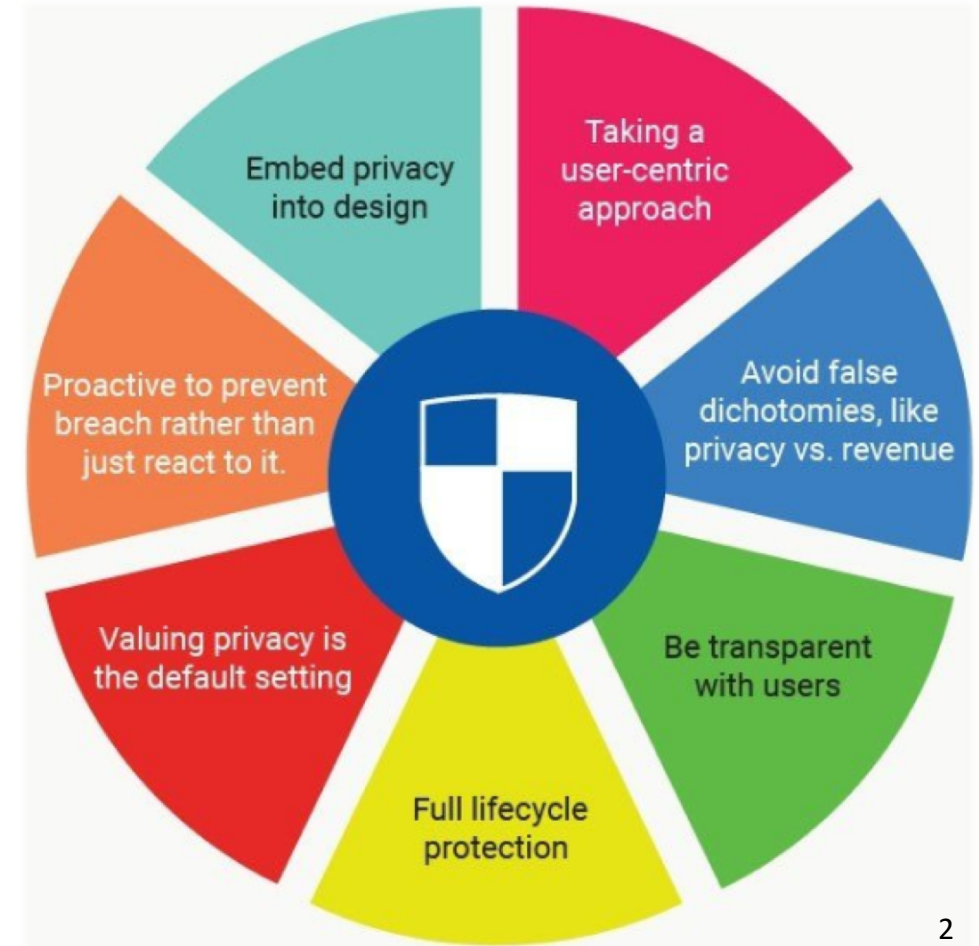
# Data Portability

- Data subjects have the right to receive the personal data concerning them in a commonly used and machine readable format
- Data subjects have the right to transmit their personal data to another Data Controller



# Privacy by Design

- Privacy by Design calls for the inclusion of data protection from the onset of designing systems, rather than as an addition
- Per Article 23, the Data Controller can hold and process only the data that is absolutely necessary for the completion of its duties
- Access to personal data is limited to those needing to perform the processing
  - This is handled via *RoleManager* permissions that limit Editor access to assigned submissions only, Reviewer blinding, etc.



# Data Protection Officers

- A Data Protection Office (DPO) is mandatory when monitoring data subjects on a large scale or of special categories of data, i.e. criminal offenses
- The DPO must have expert knowledge on data protection law and practices – may be a staff member or external service provider
- They must report directly to the highest level of management



3

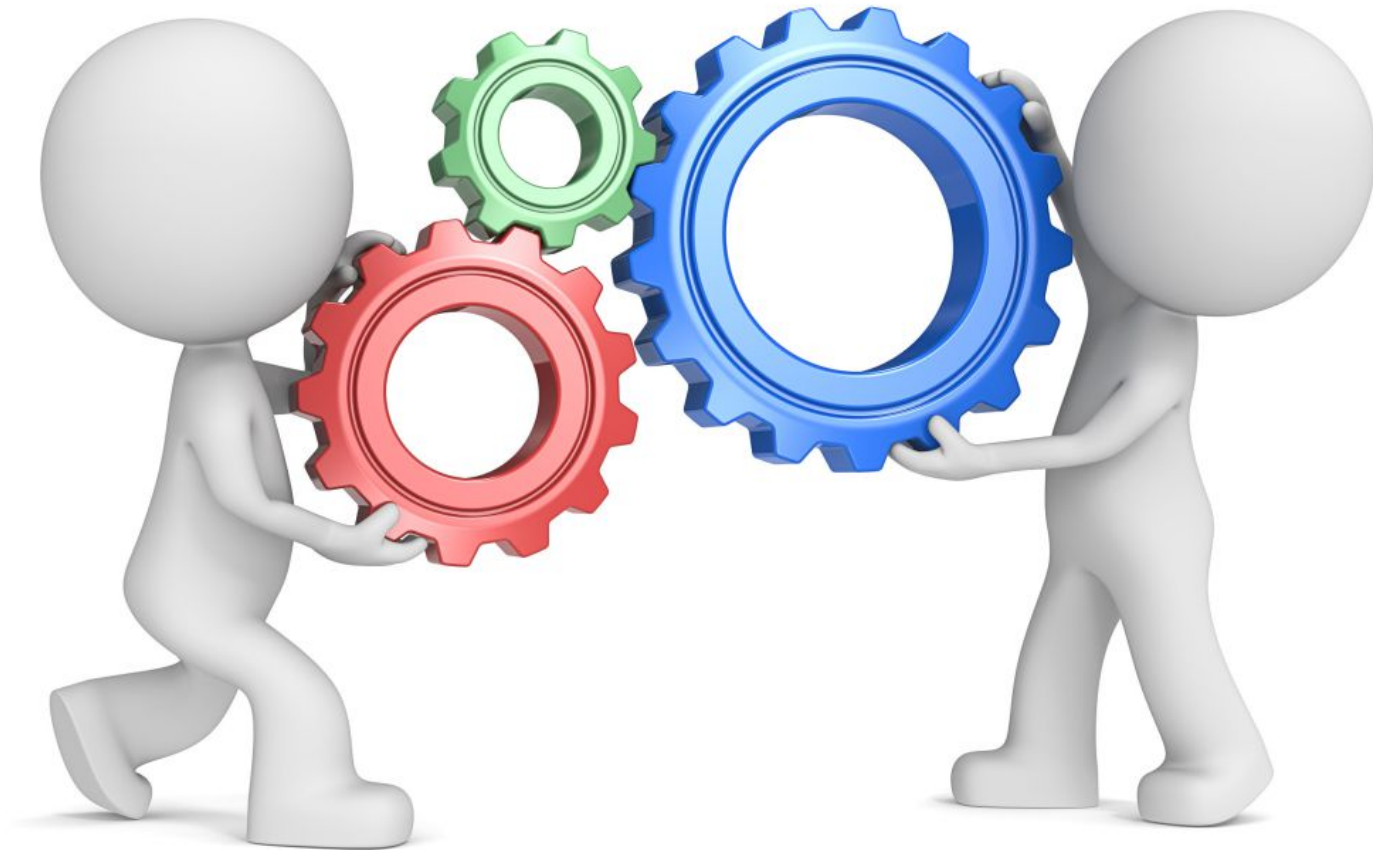
# Breach Notification

A “personal data breach” means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed

<b>Controller Obligations</b>	<b>Processor Obligations</b>
Notify supervisory authority no later than 72 hours after discovery	Notify the data controller of a breach without delay
Must describe the nature of the breach	All data breaches have to be reported – no exemptions!
No requirement to notify if no risk to rights and freedoms of natural persons	European Data Protection Board (EDPB) to issue clarification with regard to “undue delay”



# How does EM/PM support Publishers with the GDPR?



# Key Existing Design Features

- Use Role permissions to restrict access to personal data to appropriate users
  - Restrict View and Edit People permissions
  - Restrict Search People
  - Restrict View All Submissions, use Search Only Assigned Submissions
- GDE and Custom Reports allow export to CSV (Data Portability) – should access be restricted?
- Reporting Permissions are broad
  - Restrict to key personnel
- Publishers can restrict System Admin rights



# Right to Access

- Users typically choose to self-register on an Editorial Manager site
- Aries has implemented functionality to prevent users from being proxy-registered without being notified
  - This functionality applies where the proxy-registration is likely to be the point-of-entry into the Publisher's systems
- Users can view their people-related information at any time, by logging into an EM site



# Right to Access – ‘Update My Information’

## Update My Information

To update any information, make the changes on the form and click Submit. Required fields have an asterisk next to the label.

[Edit 'Go to' Publication List](#)

### Login Information

[Insert Special Character](#)

The username you choose must be unique within the system. If the one you choose is already in use, you will be asked for another.

Username \*

Sally

Password \*

••••••••

[Password Rules](#)

Re-type Password \*

••••••••

The default login role is the user role that will be used if you strike the enter key when logging in and you have not made a specific selection.

Default Login Role:

Editor ▼

### Personal Information

[Insert Special Character](#)

Title \*

Dr.

(Mr., Mrs., Dr., etc.)

Given/First Name \*

Sally

Middle Name

Family/Last Name \*

Editor

Degree

PhD

(Ph.D., M.D., etc.)

Preferred Name

(nickname)

Primary Phone

978-975-7570

(including country code)

Secondary Phone

(including country code)

Secondary Phone is for

Mobile  Beeper  Home  Work  Admin. Asst.

Fax Number

(including country code)

E-mail Address \*

trash1@ariessc.com



# Consent – New Forced Registration Question

- New 'Forced / Required' Registration question in version 15.0 to confirm that users have reviewed the Privacy and Data Use Policies from the Publisher and Aries
- When users agree to the question, the date/time and IP address is stored in their People table record

## Registration Questions

### Required Questions

Please respond to the question(s) below by checking the box(s) and clicking Continue:

Please click on the privacy policy links below and then check the box. This ensures that you are aware of your personal data privacy protection under the European Union's General Data Protection Regulation (GDPR). See [https://ec.europa.eu/info/law/law-topic/data-protection\\_en](https://ec.europa.eu/info/law/law-topic/data-protection_en)

\* I have read and accept the [Publisher's Data Use Privacy Policy](#) and the [Aries Privacy Policy](#).

<< Logout

Continue >>

# Consent – New Forced Registration Question

- New 'Forced / Required' Registration question in version 15.0 to confirm that users have reviewed the Privacy and Data Use Policies from the Publisher and Aries
- When users agree to the question, the date/time and IP address is stored in their People table record

## Registration Questions

### Required Questions

Please respond to the question(s) below by checking the box(s) and clicking Continue:

Please click on the privacy policy links below and then check the box. This ensures that you are aware of your personal data privacy protection under the European Union's General Data Protection Regulation (GDPR). See [https://ec.europa.eu/info/law/law-topic/data-protection\\_en](https://ec.europa.eu/info/law/law-topic/data-protection_en)

\* I have read and accept the [Publisher's Data Use Privacy Policy](#) and the [Aries Privacy Policy](#).

<< Logout

Continue >>

# Consent – Proxy Registration

- Users must be notified when they have been registered in EM
- New users can be proxy registered in one of the following ways:
  - Proxy Register New User
  - Register and Select New Reviewer
  - Register and Invite New Author
  - Reviewer Discovery
  - EM-to-EM Submission Transfer for publications that are not in a People Sharing Group

# Mandatory Notification of Proxy Registration

New proxy registration restrictions were enabled on May 24, 2018:

- The 'Register User and Do NOT Send Letter' button is suppressed and the Editor must enter an email address
- The new user is proxy registered but is set to 'INACTIVE' until the 'Proxy Register New User' letter is sent
- The proxy registered user's record is deleted during the nightly Batch job if they are still 'INACTIVE', i.e. have not been sent a letter
- Proxy registration that occurs for Reviewer Discovery sends the 'Proxy Register New User' letter. If the candidate does not have an email address, they cannot be selected as a Reviewer



# Right to be Forgotten / Data Erasure

- New footer text will be added to all letters sent from EM/PM/CM in version 15.0
- The footer will direct users to contact the **Journal Office** if they wish to request that their information be removed / anonymized
  - Aries will provide guidance regarding the steps to anonymize the user's data
- Additional functionality will be added in version 15.1 to include an embedded hyperlink in the footer
- Clicking the link will send a letter to the journal office to notify them of the user's request to be removed.
  - The journal office will see a new button on the *Search People – Update Information* page
  - Clicking the new button will anonymize the user's data. An option to retain the user's Given Name and Surname will be available for cases where the user's Reviewer or Editor Roles are still relevant

# Right to be Forgotten / Data Erasure

## View Letter

(EM Version 15.0)

Close

Edit and Resend

Resend

**Date:** Jun 06 2018 11:45AM  
**To:** "Buzz Lightyear Aldrin" subnoske@trash.com  
**From:** "My Journal" trash1@ariessc.com  
**Subject:** Submission Confirmation for "Submit Early Decision" is a great new feature!

Dear Dr. Aldrin,

Your submission entitled ""Submit Early Decision" is a great new feature!" has been received by journal Sally's 15.0 Dev Site

You will be able to check on the progress of your paper by logging on to Editorial Manager as an author. The URL is <http://tw4.editorialmanager.com/sallydev150/>.

Your manuscript will be given a reference number once an Editor has been assigned.

Thank you for submitting your work to this journal.

Kind regards,

Sally's 15.0 Dev Site

If you would like your personal information to be removed from the database, please contact the publication office.

Close

Edit and Resend

Resend

# Right to be Forgotten / Data Erasure

(EM Version 15.1)

Please view the submission before approving it to be certain that your submission remains free of any errors.

Thank you for your time and patience.

Editorial Office Staff  
Journal of X, Y and Z  
<http://jxyz.edmgr.com/>

You may request that we remove your personal details at any time:  
[https://journal.editorialmanager.com/privacy/HAJU886%\\$S763C2](https://journal.editorialmanager.com/privacy/HAJU886%$S763C2)

# Right to be Forgotten / Data Erasure

(EM Version 15.1)

## Request Removal

This page allows you to issue a request for your details to be removed from the database for *The Journal of X, Y and Z*.

### Request Removal from the Database

This option will forward a request to the publication staff to remove your details from the database. This requires manual intervention and so is not immediate or automatic. You will be required to provide proof of identity in the form of your password for this site, or by authenticating the ORCID iD linked to your record.

Please enter any additional comments you wish to make to the journal staff:

[Privacy Policy of The Publisher Ltd \(the Controller of your data\)](#)  
[Privacy Policy of Aries Systems \(the Operator of this site\)](#)

## Search People - Update Information

To update any information, make the changes on the form and click Submit. Required fields have an asterisk next to the label.

**Dr Anne A. Author** 

Self-Registered:  
14 Oct 2003

Last Modified:  
15 Feb 2017

Inactivate this User

User asked to be removed on:  
16 Feb 2017

Delete this User  Retain name.

Send Login Details

\*The user will be required to change the password on login.

- Exclude this user from receiving all batch and reminder emails:
- Always
  - When Unavailable Dates are active

[Open Special Character Palette](#)

### User Information

The default login role is the user role that will be used if you strike the enter key when logging in and you have not made a specific selection.

Default Login Role:

Default Login Menu:

Available as a Reviewer? \* Yes  No

Board Member? Yes  No

Forbidden as a Reviewer? Yes  No

Reviewer Role \*

Publisher Role \*

Editorial Role \*

Editor Description

Activity Details

Additional People Details

Do not allow this user's contact information to be overwritten during synchronization with other publications in the group. (Note: the Username might change even if this box is checked.)

### Personal Information

Title \*  (Mr., Mrs., Dr., etc.)

Given/First Name \*

Middle Name

Family/Last Name \*

Secondary Family/Last Name

# Summary – EM and GDPR Compliance

## **Right to Access/Data Portability**

EM users can access their information at any time by logging into a site where they are registered. Admins can supply data via GDE

## **Clear Consent**

Mandatory Registration Question  
Can no longer be proxy-registered without notification

## **Right to be Forgotten**

New footer text is added to all EM emails  
15.0 – users contact the JO and information is anonymized manually  
15.1 – users click link and the JO clicks button to anonymize automatically

# EM and GDPR Compliance

## **Privacy by Design**

Aries' development follows best practices with regard to data protection and privacy

## **Data Protection Officer**

Aries Data Protection Officer can be reached by sending an email to [privacyofficer@ariessys.com](mailto:privacyofficer@ariessys.com)

## **Breach Notification**

In the event of a detected data breach, Aries Client Services will notify Publishers



# Steps to Consider Now

- Consider setting up Forced/Required Registration Questions for consent
- Consider creating Custom Merge Codes to insert instructions/contacts for users to request removal
- Consider limiting permission to proxy register new reviewers
- Review Editor permissions, considering who should be able to:
  - View every submission in the system
  - Search the entire people database
  - Generate reports and potentially export bulk data

NOTE: Aries enabled enforced proxy notifications for all sites on May 24, 2018





# What are the Publisher's Responsibilities?



# Publisher Responsibilities

- Data Use and Privacy Policy
  - EM will include links to the Data Controller's Data Use and Privacy Policy; this is your opportunity to explain how user data will be used/transferred during the publishing process
  - Publishers must provide Aries with a URL/URI for their Data Use and Privacy Policy
- Data Subject Requests
  - Publications must provide data subjects with their personal data in a standard machine-readable format upon request
  - Publications must anonymize / inactivate a data subject's record upon request
- Data Loads
  - Publishers and/or Journals are responsible for notifying data subjects that they have been registered via a Data Load
- Data Protection Officer
  - Larger Publishers may need to identify a Data Protection Officer
  - The Publisher must notify Aries of the DPOs Contact Details (in the event of a data breach)

# GDPR Compliance Questions

- Publishers are encouraged to contact their appropriate legal representatives with any questions or concerns
- Aries Systems Corporation does not represent its interpretation of GDPR requirements as being definitive with respect to the Data Controller's obligations under the GDPR



# Important Note!

- Following EMUG, we will remove your contact information from our system
- To receive occasional emails from about upcoming **user group meetings**, **industry** and **EM/PM news**, please re-subscribe to our mailing list:
  - <http://bit.ly/ariesnews>
  - Complete the form at the registration desk
  - Email [marketing@ariessys.com](mailto:marketing@ariessys.com)



