

NetSupport DNA and GDPR Compliance

Introduction

The **EU General Data Protection Regulation ("GDPR")** comes into force across the European Union on 25th May 2018 and brings with it the most significant changes to data protection law in two decades. Based on privacy by design and taking a risk-based approach, the GDPR has been designed to meet the requirements of the digital age.

NetSupport DNA is a suite of easy-to-use tools for managing and supporting IT assets across an organisation's network. Its features include automatic discovery of devices; hardware and software inventory; change tracking and software licence management; energy monitoring; power management; USB endpoint security; printer monitoring; application and internet metering; a flexible alerting suite; and an easy-to-use software distribution module.

The NetSupport DNA product does store and process personal data and, as such, is impacted by GDPR. The aim of this document is to provide you with all the information you need relating to the NetSupport DNA product to ensure that personal data is processed in accordance with these new regulations.

How does NetSupport DNA process personal data?

NetSupport DNA uses an agent installed on computers to gather inventory and usage data. The NetSupport DNA Agent will record the following information:

Hardware inventory

The details of the hardware inventory information recorded by NetSupport DNA are not relevant to GDPR, as these are not considered personal data and therefore will not be listed in this document.

Software inventory

As with hardware inventory, the software inventory is not classed as personal data and is therefore not detailed in this document.

Usage Information

The following usage information may be recorded:

- All log on, log off, lock and unlock events
- All power on, power off events
- All applications started and closed
- All websites visited
- All print jobs sent to printers.

All this information is recorded at the Agent machine and then sent to the NetSupport DNA Server using a proprietary communications protocol, and is then processed and stored in the NetSupport DNA database.

Where is the personal data stored?

NetSupport DNA is an on-premise solution and runs on servers located at the organisation. The data stored in NetSupport DNA is stored in an SQL server database that is either installed as part of the installation or a pre-existing SQL database server. Where the SQL database server is installed as part of the NetSupport DNA installation, any direct access to the database is restricted by the security policies built into Microsoft SQL Server 2012. Where a pre-existing SQL server is used, the access is controlled by the security policy in place for the pre-existing SQL server.

What data is collected and stored?

The table below lists all of the personal information that is stored in the NetSupport DNA database.

Name	Purpose	Legal Grounds	Sensitivity	Collection
Name	Identification	Legitimate interests	Personal Data	Automatically collected
Logon Name	Identification	Legitimate interests	Personal Data	Automatically collected
Email Address	Communication	Legitimate interests	Personal Data	Optional Data
Phone Number	Communication	Other	Personal Data	Optional Data
Mobile Phone Number	Communication	Other	Personal Data	Optional Data
Pager Number	Communication	Other	Personal Data	Optional Data
Department	Identification	Other	Personal Data	Optional Data
Employee/Student No	Identification	Other	Personal Data	Optional Data
Address	Communication	Other	Personal Data	Optional Data
City/Town	Communication	Other	Personal Data	Optional Data
County/State	Communication	Other	Personal Data	Optional Data
Post/Zip Code	Communication	Other	Personal Data	Optional Data
Accessed URL	Safeguarding	Legitimate interests	Personal Data	Automatically collected
Title of Accessed URL	Safeguarding	Legitimate interests	Personal Data	Automatically collected

NetSupport DNA and the GDPR data subject rights

GDPR defines eight rights of the individual with regard to the processing of personal data. Part of complying with the new regulations is to ensure that you can comply with these individual rights. In this section, we explain each right and how it affects the NetSupport DNA product.

The right to be informed

Individuals have the right to be informed about the collection and use of their personal data. This is a key transparency requirement under the GDPR. For further information and guidance, see <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-be-informed/>

NetSupport DNA has an “Acceptable Use Policy” feature and we recommend that, as part of your Acceptable Use Policy, you should either notify users that they are being monitored and what data is being recorded – or direct them to your Privacy Policy that should contain this information.

The right of access

Under GDPR, individuals have the right to access their personal data. This allows individuals to be aware of and verify the lawfulness of the processing.

See <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-of-access/>

With a data subject access request, NetSupport DNA provides an export facility in the database maintenance tool that can be used to export the required data. Once Exported any data that is not relating to the Data Subject should be redacted.

Alternatively using the Query tool in the DNA Console, you can create queries for the data related to the data subject.

The right to rectification

Under Article 16 of the GDPR, individuals have the right to have inaccurate personal data rectified.

See <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-rectification/>

The NetSupport DNA Agent installed on all computers has a feature available so that any user can view and update their personal information. Alternatively, this information can be updated manually by using the NetSupport DNA Console application.

The right to erasure

Under Article 17 of the GDPR, individuals have the right to have personal data erased. This is also known as the 'right to be forgotten'. The right is not absolute and only applies in certain circumstances. For information on when this right is applicable, see the ICO guidance at: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-erasure/>

If this is applicable, then using the Database Maintenance feature from the NetSupport DNA Console, you can delete all the information related to an individual.

The right to restrict processing

Article 18 of the GDPR gives individuals the right to restrict the processing of their personal data in certain circumstances. The right is not absolute and only applies in certain circumstances. In most cases, you will not be required to restrict an individual's personal data indefinitely, but will need to have the restriction in place for a certain period of time.

See <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-restrict-processing/>

The data that NetSupport DNA collects automatically is defined by the setting for the profile that is active when the user is logged on to a computer. If you need to disable any collection of data for an individual, you can create a profile and disable all data collection; this profile can then be assigned to an individual to stop NetSupport DNA collecting any information.

The right to data portability

The right to data portability only applies:

- to personal data an individual has provided to a controller;
- where the processing is based on the individual's consent or for the performance of a contract; and
- when processing is carried out by automated means.

See <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-data-portability/>

This would not apply to any data processed by NetSupport DNA.

The right to object

The Guidance from the ICO states that:

“Individuals must have an objection on ‘grounds relating to his or her particular situation’. And that you must stop processing the personal data unless you can demonstrate compelling legitimate grounds for the processing, which override the interests, rights and freedoms of the individual”.

See <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-object/>

If you need to stop using DNA to record information about a specific individual, you can do this by using the NetSupport DNA profiles feature to create a profile that disables monitoring and then assign this to the individual.

Rights in relation to automated decision-making and profiling

The GDPR has provisions on:

- automated individual decision-making (making a decision solely by automated means without any human involvement); and
- profiling (automated processing of personal data to evaluate certain things about an individual). Profiling can be part of an automated decision-making process.

See <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/rights-related-to-automated-decision-making-including-profiling/>

NetSupport DNA does not perform any decision-making based solely on automated processing.

Some common questions

Is NetSupport the data processor or the data controller?

For a customer using NetSupport DNA, NetSupport does not have access to any of the organisation's data. Once the product is installed, all of the data is stored locally on the organisation's servers. Therefore, within the context of NetSupport DNA, NetSupport is neither the data controller nor the data processor.

Is the school the data processor or the data controller within the context of NetSupport systems?

For users of NetSupport DNA, they remain the data controller of their own data on the system.

Does NetSupport DNA process personal data?

Personal information associated with individuals is processed by NetSupport DNA, therefore the rules of GDPR apply to its use. This personal data is stored locally on the organisation's servers and therefore the organisation will remain the data controller of this personal information.

Does NetSupport DNA process sensitive data?

The corporate edition of NetSupport DNA does not process any information that could be classed as sensitive data.

Do I need to get consent from all staff before I can monitor them in the workplace with NetSupport DNA?

No. You do, however, need to give a clear notification that there is a monitoring system in place. This notification should explain what NetSupport DNA will record, so staff understand what is monitored and why.

If you have any further questions regarding this document or any other queries regarding NetSupport DNA please contact us.

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