





SOP Reference #: CS010

Operation/Task:	Data Privacy Compliance Protocol			Equipment:	
Owner:	Client Services Manager	Date Prepared:	8/28/19	Department:	Client Services
		Revision History:	See last page		

ALERTS (see below): Critical Step  Quality Check  Tip  Team Safety 

Purpose:

This SOP/work instruction describes the process to perform erasure, access and/or portability request(s) in compliance with Data Privacy Laws as presented by the client.

Step #	Alerts	Step Description - "What to Do"	"How to Do it"	"Why to Do it"
1		Identify Jobs	Identify jobs associated to Customer/Account If necessary, jobs can be identified through PrintStream reporting	This is to know what jobs ENPOINTE obtains and to accurately perform the customer request
2		Identify the status of the job(s)	Review status of jobs in PrintStream Verify whether each job is Active / Closed / Archived and when closed	This will guide you in identifying location(s) of where the data resides
3		Identify file locations via status'	Active - DP_Production - DFEs Backup (21 Days) Archive Storage System (for jobs no longer active) Email FTP - Internal - External Databases	This is to aid you in providing location direction within your ticket to the DP and CAPS departments

4		Define the Client request type (see Definitions below)	<ul style="list-style-type: none"> - Access [Client requested report specific to a unique individual and/or data files] - Erasure [Specific record(s) erasure – more labor intensive, increased costs involved to perform erasure] - Erasure [Entire data file(s) erasure] - Portability [Request for return of data to specific users] 	This is to aid you in providing direction as to which type of compliance request your client is requesting within your ticket for DP and CAPS processing
5	♦	Obtain labor quote from DP and CAPS	Request time with DP, CAPS Manager and Compliance Administrator to review the data privacy compliance request and gather an estimated time for processing the request	This is to ensure labor and associated fees are communicated and invoiced properly
6		Create PrintStream Job and Ticket encompassing type of request and specific details of request	<p>Follow standard ticket process for opening a job and creating a ticket</p> <p>Provide ticket to both the DP Manager and CAPS Manager</p>	PrintStream is the data repository which generates the ticket as a standard communication vehicle, the ticket provides clear directive for internal teams to process customer requests and ensure proper invoicing
7	♦	Provide attestation statement to client and ensure customer satisfaction	Obtain an attestation statements from both the DP and CAPS Managers that specifies the request has been performed accurately and completely, send via email to the client	This ensures communications are clearly and proactively provided regarding requests
8	☑	Complete Client request and close job	<ul style="list-style-type: none"> - File job communication/documentation within the client folder on the network [CSRApps (\bp-file06) K drive]. This includes: the customer request, attestations, pdf of the ticket and any emails. If a folder does not exist for this information, create a new folder and name it: "Data Privacy Comp Request". - Follow standard billing process, move to Accounting for invoicing 	Ensure we maintain record of all request details, perform accurate invoicing and receive payment for services

Notes:

Definitions:

Revision History	Description of Changes	Requested by	Date
Rev 1	New SOP	Michelle Motschke	9/25/19
Rev 2	Added information to step 8 in regard to saving all Data Privacy Compliance Request communications	Michelle Motschke	11/13/19
Rev 3	Updated to current SOP format: gray header bar; branding updated: changed GLS reference to ENPOINTE, updated font size/type. Changed Owner to Client Services Manager.	Liz Nourse	4/19/21
Rev 4	Replaced all references to ITBSC with CAPS	Liz Nourse	6/9/23

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Rev. Date 4/20