



protel Air

GDPR Compliance

What it is, what we are doing, and what you have to do

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1 Introduction

Before reading this document, we encourage you to review the [protel GDPR General Information](#) which provides an overview of both GDPR and the approach that protel has taken to provide related tools for our customers, the “data controllers”.

As a protel Air customer, your property management system is hosted in one of Amazon’s data centres, classified as one of the most secure hosting providers in the world. Which data center is used for your hotel depends on the geographical location of your property. In case you are not aware of the hosting location, your protel service partner can provide you with this information.

The following sections in this document describe in detail the functionality that has been developed and implemented in protel Air, and specifically designed to assist our customers (“data controllers”) in abiding to the GDPR regulations.

It is the responsibility of each hotel to implement and decide how the hotel wishes to use the functionality. In this document we aim to provide you with our best recommendations for compliance. However, you are also welcome to contact your protel service partner who can assist you with any questions or advice.

We urge you to review your entire technology landscape when implementing procedures related to GDPR, and remind you that it is not only your property management system that may hold data classified as PII (Personal Identifiable Information) data.

While GDPR may seem daunting, it is not as complicated as one may expect. Essentially it consists of three elements:

- ▼ Identifying a consent level for each profile
- ▼ Obliging to the consent level of each profile, and anonymizing their data as instructed
- ▼ Providing the guest with complete information about their data at any given time

Let’s get started.

2 Requirements

All of the user rights which are needed to perform GDPR adjustments are automatically included in the **pAir Front Office** role.

If you log in with another user role, the rights specified in section 12 '**New user permissions**' must be assigned to this role.

- ① Further information about user roles can be found in the **protel Air HTML5 Online Help**, section '**System data – System – User administration**'.
- ① For more information about specific user rights related to GDPR functions, go to section '**New user permissions**'.

3 Consent levels

As a first step, it is essential to understand consent levels and determine which ones you wish to use at your hotel.

What are consent levels? As a 'data controller' you must always inform the guest of the data you are storing about him, and if you are doing so for a longer period of time than is legally required, you must obtain his consent.

In protel Air we use generic terms for our three different consent levels, as they are designed to allow each hotel to freely configure the number of days they wish to store profiles data for.

Minimum

This term refers to the number of days that your hotel is legally obliged to store profile information. Let's say that in your country, all profiles must be stored for 5 years or 1,825 days.

Maximum

This term refers to the number of days that your hotel desires to store profile information. Typically this is longer than the legally required days, let's say 7 years or 2,555 days. If you do not wish to store the profile data longer than you are legally obliged to, then the Minimum and Maximum would have equal values.

Keep

This term refers to the option of storing your profile data without a defined deletion date.

- ▶ **TASK:** Identify how long your are legally obliged to store profile data and if you wish to store the data longer, then for how long?

4 Apply default consent level

Right now, all profiles in your protel Air PMS have no recorded consent level. But once GDPR comes into effect, you must handle all your profiles according to these regulations, even if you have not had the opportunity to obtain any form of consent in the past. Therefore protel recommends the most cautious approach, which is to set the default consent level to **Minimum**.

There will be two steps for activation of the privacy settings and functionality in protel Air:

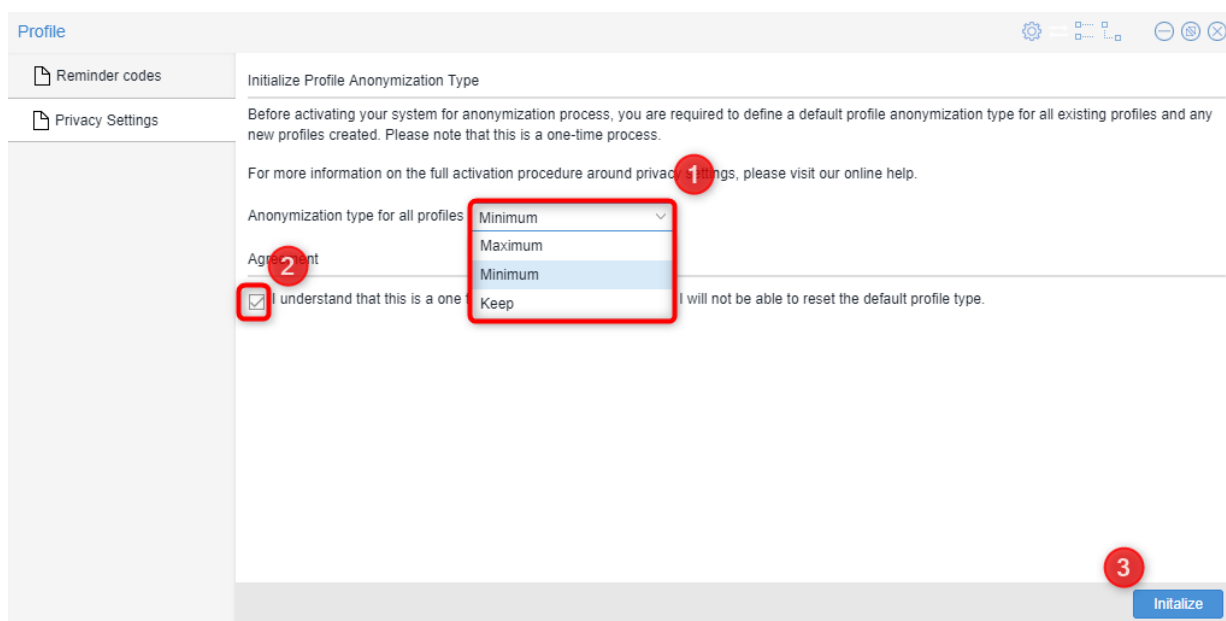
- ▼ **Step 1** is called **Initialize Profile Anonymization Type**. The hotel (the responsible user) defines and sets a default anonymization type for all existing profiles. This can only be done **once**. After the default has been set, this default value cannot be changed until you proceed with step 2.
- ▼ **Step 2** is called **Activate Anonymization**. User defines the retention periods for **Minimum and Maximum Anonymization** type. User defines the new default anonymization type for newly created profiles (this is where the default setting can be changed, if desired). Activation of the anonymization process which occurs with each EOD run is also in this step. These values (retention periods and anonymization type defaults) can be changed at any point. Each time a change is made, the user must agree to the disclaimer. These changes are recorded against the user in the logs and require special permissions.

Step 1: Initialize profile anonymization type

Access your protel Air setup area and navigate to **System data - Hotel Management - Guest profile - Privacy Settings**. You will only see options for Step 1 at this point.

1. Select the default that your hotel wishes to use (*Maximum, Minimum, Keep* – see above)
2. read the disclaimer carefully, and tick the checkbox.
3. Click the **Initialize** button.

↳ This assigns the default Anonymization type to all existing profiles and any newly created profiles.



Once this task is completed, all your profiles will have been assigned your selected consent level. From this moment onwards, all profiles that are newly created will be assigned this default anonymization type.

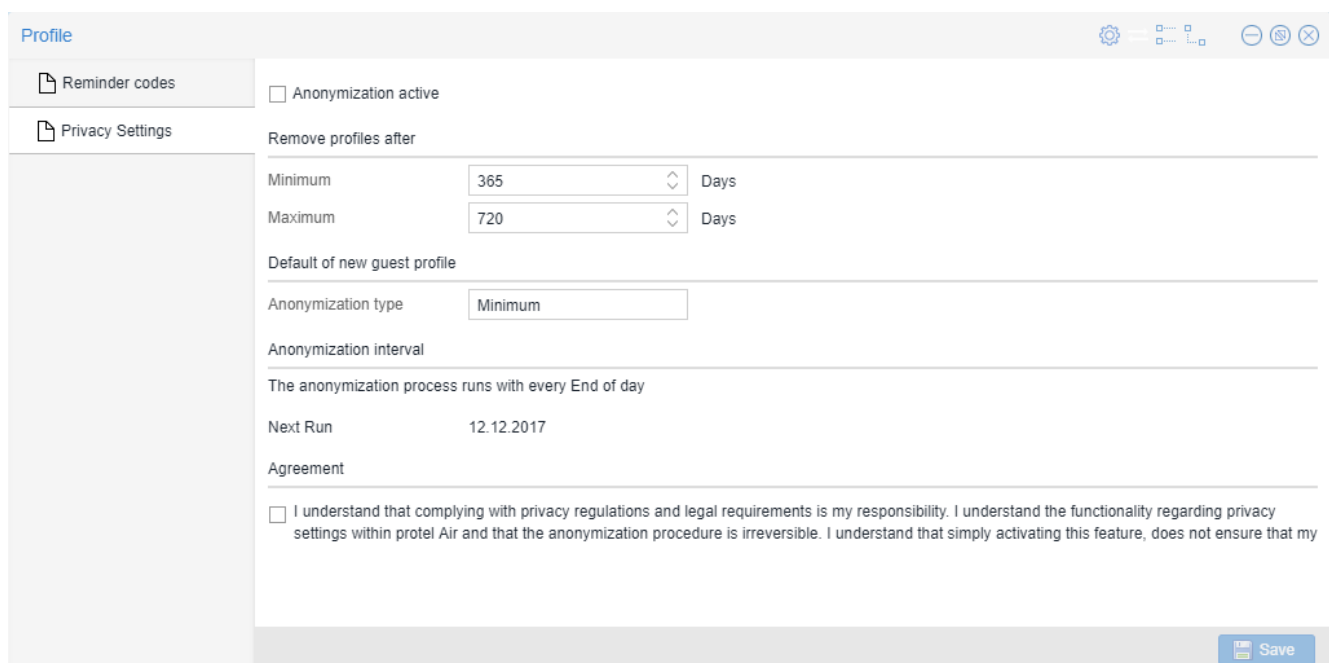
The anonymization types are on each profile, but there is at this point, no action behind it. This gives you, the hotel, time to review your guest profiles and possibly seek to acquire consent from certain guests in order to change the setting to either **Maximum** or **Keep**.

Step 2: Anonymization activation

When you are ready to start the anonymization process, you will navigate back to this area.

❗ We will describe this later in section [“Setting your data retention values”](#) and section [“Activating profile anonymization”](#).

In the meantime, continue with section [„New fields in the Profile”](#) (next page).



The screenshot shows the 'Profile' settings interface. On the left, there are two tabs: 'Reminder codes' and 'Privacy Settings'. The 'Privacy Settings' tab is active. The main content area includes the following sections:

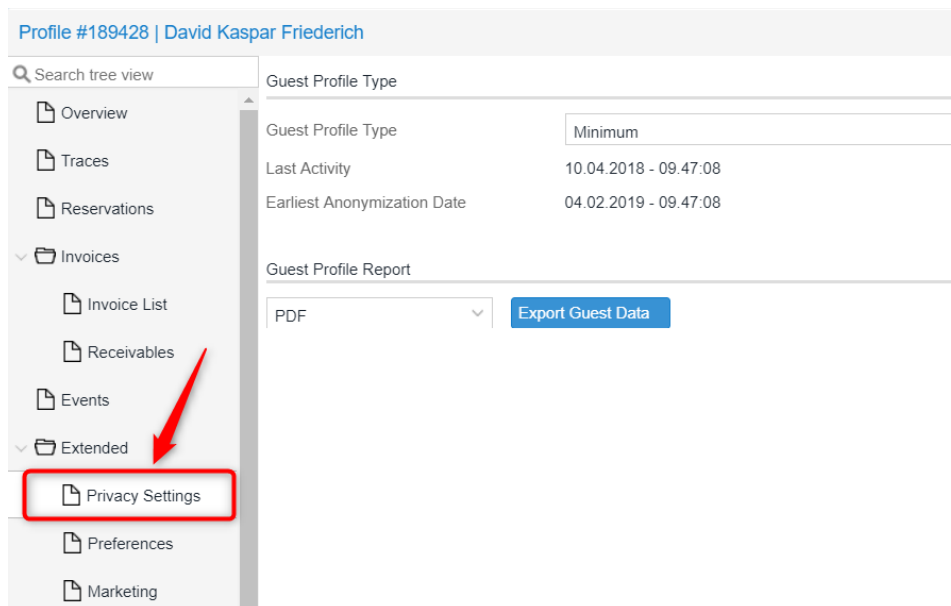
- Anonymization active:** A checkbox that is currently unchecked.
- Remove profiles after:** A section with two rows:
 - Minimum: 365 Days
 - Maximum: 720 Days
- Default of new guest profile:** A section with one row:
 - Anonymization type: Minimum
- Anonymization interval:** A section with one row:
 - The anonymization process runs with every End of day
- Next Run:** 12.12.2017
- Agreement:** A checkbox that is unchecked, followed by the text: "I understand that complying with privacy regulations and legal requirements is my responsibility. I understand the functionality regarding privacy settings within protel Air and that the anonymization procedure is irreversible. I understand that simply activating this feature, does not ensure that my".

At the bottom right of the form, there is a 'Save' button.

5 New fields in the Profile

5.1 'Privacy settings' tab

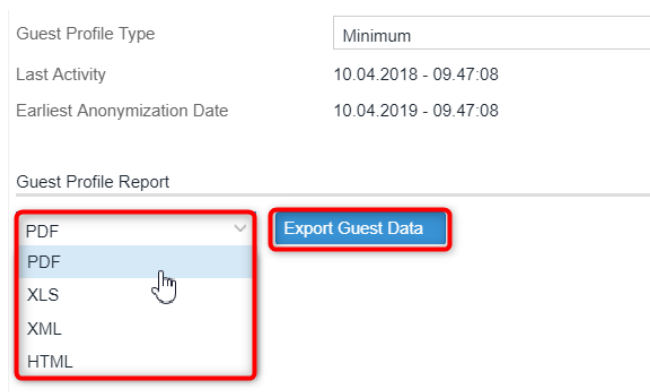
Once you create the default anonymization type (Step 1 above), all profiles will be updated and some new fields will be available. They can be found in the **Profiles** dialog box under the **Extended** -> **Privacy Settings** tab. You see that there will be a **Guest Profile Type**. This will at first match your default type. This type can be changed when the guest actively requests this. There are of course permissions which can restrict a user to edit this field (cf. section '**New user permissions**').



The **Last Activity** and **Earliest Anonymization Date** fields are located under the **Guest Profile Type**. These will populate when you activate the anonymization process. They are helpful when communicating with a guest inquiring about the consent level or their right to have their data deleted.

Guest Profile report

protel air lets you export all the personal data that you hold about a guest in a user-friendly format. This will assist you in complying with a guest's request for a copy of their data, e.g., to check what personal data you hold about them in your hotel software. In order to do so, select the data format in which the report is to be generated, and click the **Export Guest Data** button – see the following figure:

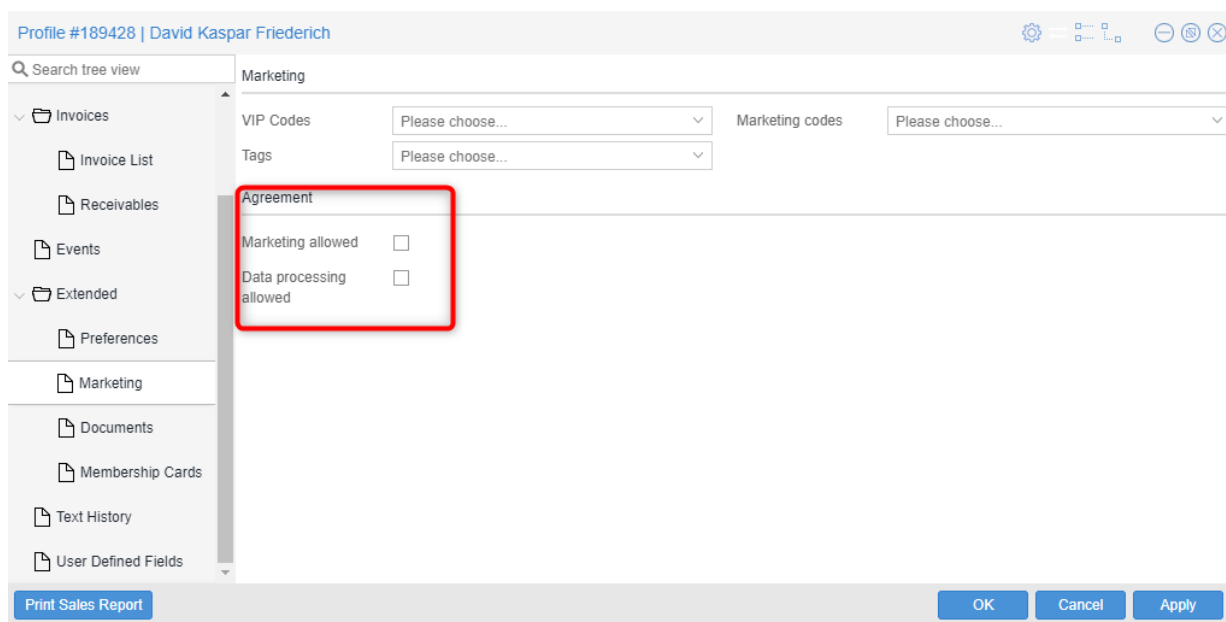


5.2 'Marketing' tab

Guest consent (opt in fields)

In addition to the **Guest Profile Type**, **Last Activity** and **Earliest Anonymization Date** fields in the Privacy Settings tab, you will find that your profile screen contains the new fields below in the **Marketing** tab.

ⓘ These fields are important and must be well understood by all team members that interact with the profiles in protel Air.



The screenshot shows the 'Marketing' tab for a guest profile. The 'Agreement' section is highlighted with a red box and contains the following fields:

- Marketing allowed
- Data processing allowed

The fields allow you to indicate two levels of consent with the guest.

Marketing Allowed relates to permission to use the guest details for marketing purposes. Usually hotels in the EU will already have such a consent process in place. However, don't forget that GDPR requires the hotel to have this option "un-ticked" or "opted-out" by default.

Data Processing Allowed relates to consent to process the customers data to 3rd parties that take part in the hotel's technology landscape. Remember that you must provide visibility to the guest about the systems their data will be shared with.

These two fields have been given these names by protel. It is, however, up to the hotel to implement how these two consents are described in guest facing touch points. Usually a descriptive sentence is used. In the same way, the display of all 3rd parties with whom you will be sharing the data may be presented separately as part of the consent request process.

► **TASK:** Now you should implement the consent levels on your guest facing touch points, such as your registration card. Your teams must be trained to update the **Guest Anonymization Type**, **Marketing Allowed** and **Data Processing Allowed** fields, according to the selection the guest has made on your registration card.

In the near future, these elements will also be available for protel Web Booking Engine (WBE) and protel Voyager. You will be able to provide the three profile settings and the two opt in fields as a selection to the guest when they make the booking or check in. These will then populate the profile in the reservation. Further exact details about this offering will be provided with release of the functionality.

6 Setting your data retention values

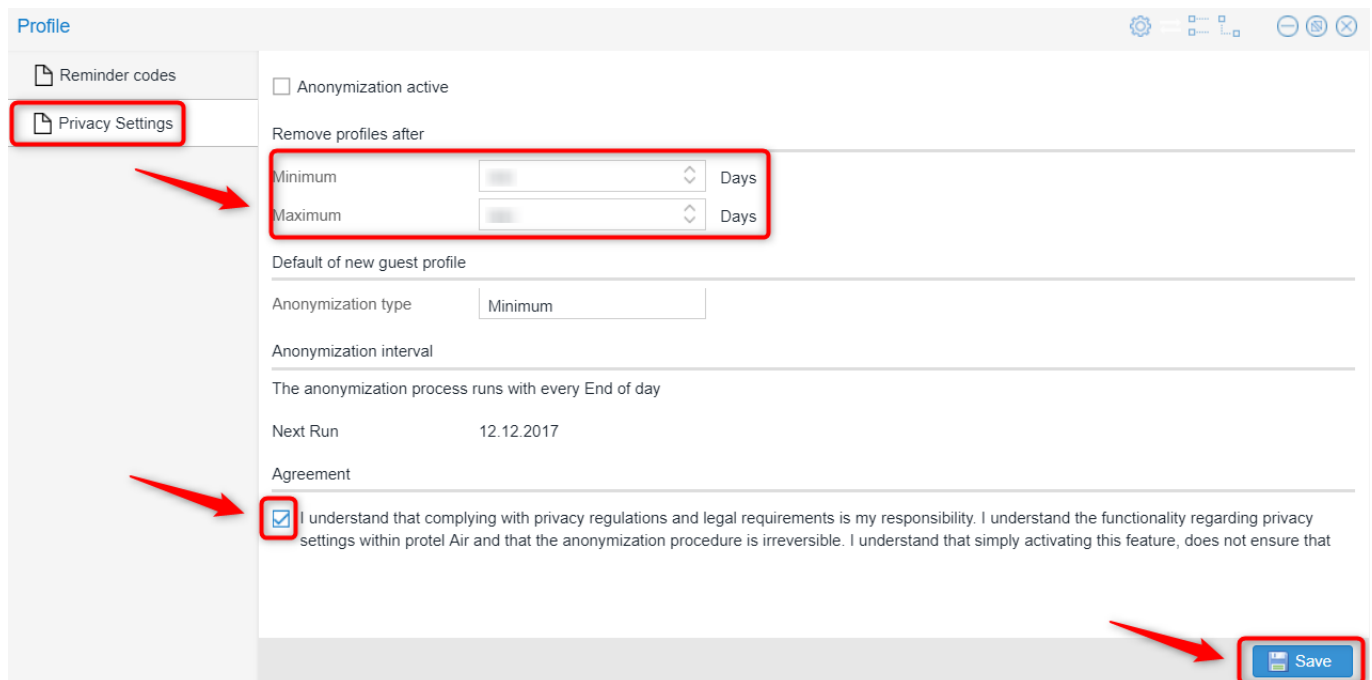
As soon as you are ready to define the retention periods, navigate back to **System data - Hotel Management - Guest profile - Privacy Settings**.

Add the value in days for both **Minimum** and **Maximum** retention periods.

Minimum value for both is 30 days. Maximum should be a higher value than minimum. Fill out the values you have determined in the task of [section 3](#) 'Consent levels'.

Keep or change your new default anonymization type. This will apply only to new profiles created, and not overwrite any existing settings on profiles. These changes will only take effect when the anonymization is active.

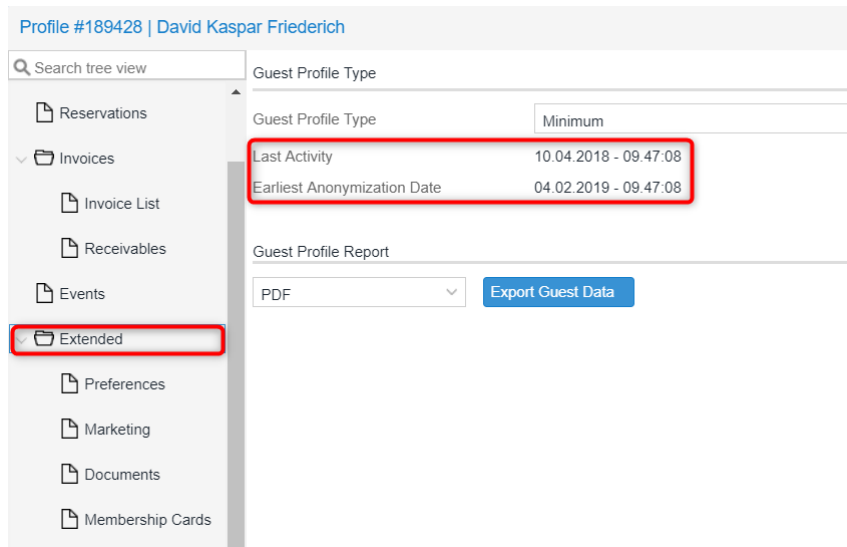
After adding the **Minimum** and **Maximum** retention periods, tick the checkbox at the bottom of the window and click the **Save** button – compare the following figure.



The screenshot shows the 'Profile' settings window with the 'Privacy Settings' tab selected. The 'Anonymization active' checkbox is unchecked. Under 'Remove profiles after', the 'Minimum' and 'Maximum' retention periods are both set to 30 days. The 'Anonymization type' is set to 'Minimum'. The 'Anonymization interval' is set to 'The anonymization process runs with every End of day'. The 'Next Run' date is 12.12.2017. The 'Agreement' checkbox is checked. The 'Save' button is highlighted.

7 Understanding the calculation of the Anonymization date

There are two fields in the profile which are controlled by protel Air. We mentioned them in [Section 5](#) ('New fields in the Profile') and we will now dig a bit deeper here. The date fields reflect profile activity and the calculated anonymization date.



Profile #189428 | David Kaspar Friederich

Search tree view

- Reservations
- Invoices
 - Invoice List
 - Receivables
- Events
- Extended**
- Preferences
- Marketing
- Documents
- Membership Cards

Guest Profile Type

Guest Profile Type: Minimum

Last Activity	10.04.2018 - 09.47.08
Earliest Anonymization Date	04.02.2019 - 09.47.08

Guest Profile Report

PDF [Export Guest Data](#)

The **Last Activity** field date is generated by protel Air and cannot be amended by the user at any time. This date is taken from the log activity, at the profile level. It is important to understand how protel calculates the age of the profile. The number of days entered in your **Minimum** and **Maximum** settings are counted from the last time the profile had any activity, not considering the date when the profile was first created.

i If a profile has been imported from a third-party PMS, the **Last Activity** field is set to May 25th 2018.

What is considered an activity?

- ▼ Creation of a reservation
- ▼ Modification of a reservation
- ▼ Check out of a reservation
- ▼ Cancellation of a reservation
- ▼ Creation of an invoice (Guest Ledger and/or Accounts Receivable)
- ▼ Payment of an invoice (Guest Ledger and/or Accounts Receivable)
- ▼ Payment cancellation of an invoice (Guest Ledger and/or Accounts Receivable)
- ▼ Any action on a trace or event which is related to a profile (MICE)

Earliest Anonymization Date will also be calculated automatically and is not amendable by the user. This is calculated by the **Last Activity Date** plus the number of days assigned to the anonymization setting used for that profile.

For example: A profile is set to **Minimum Setting (365 days)** and the last activity on the profile was when the guest checked out and paid his invoice (4 January 2018). Then the Expected anonymization date will be: 4 Jan + 365 days = 3 January 2019.

i Going forward, your team members must understand the impact of updating this field and be ready to do so whenever a guest requires it.

8 Understanding profile anonymization

Before we activate the automatic anonymization process, it is important to understand what will happen to your profiles during this process.

When a profile is anonymized, protel will remove all fields in a profile which is deemed as Personal Identifiable Data. For reporting and statistics purposes, the profile itself will not be deleted. The last name will be masked with “x”, except for the last two digits. So, for example ‘Miller’, will then be ‘xxxxer’ and the rest of the fields will be deleted.

The profile anonymization will **not take place** on the **Earliest Anonymization Date** if one of the following exists:

- ▼ Any current or future reservations for the profile in the system.
- ▼ Any open folios for the profile in the system.
- ▼ Any open City Ledger in the system.
- ▼ Any current or future MICE events for the profile in the system.

9 Activating profile anonymization

<p>▼ PLEASE NOTE!</p>	<p>For security reasons, the profile anonymization process can only be activated shortly before the GDPR comes into force (at the latest on 25 May 2018). Up to this point, the Anonymization active checkbox will be grayed out!</p> <p>We suggest that you first set the default data retention values, and then gradually adjust the privacy settings of your profiles.</p> <p>Activate the profile anonymization in protel Air by 25 May at the latest (see following section).</p>
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Once you are ready to implement full privacy settings functionality, it is time to activate the automatic profile anonymization process.

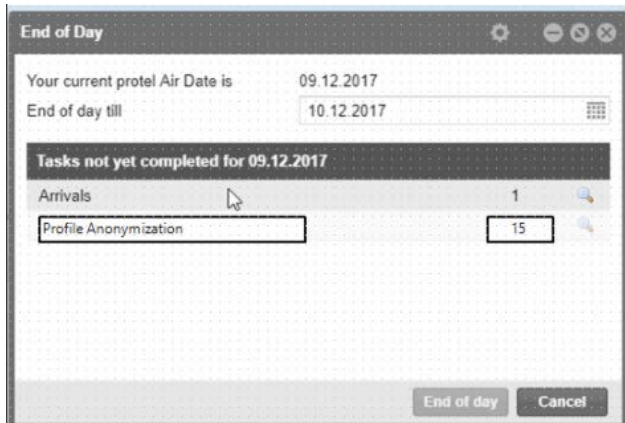
1. Access your protel Air setup area and navigate to **System data - Hotel Management - Guest profile - Privacy Settings**.
2. Once again, check the values you have determined in the task of [section 3](#) ‘Consent levels’.
3. Tick the **Anonymization active** checkbox, read the disclaimer carefully, and click on **Save**.
4. Once you have completed this task, all of the profiles which are eligible for anonymization will be anonymized in the first upcoming EOD.

Please Note: This is an **irreversible process**, so it is important that you carefully consider when deciding on these settings.

<p>▼ PLEASE NOTE!</p>	<p>In order to fully comply with the legal requirements, the guest data of your training databases will also be anonymized when the GDPR comes into force.</p>
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10 Running EOD after activation of anonymization

During the EOD, the dialogue indicates how many profiles will be anonymized during that procedure – see the following figure.



Click the icon with the magnifying glass to open a list containing the profiles which will be anonymized.

ⓘ Note: When analyzing the data to be anonymized next, protel Air does not refer to the end-of-day date, but to the real date. E.g., if you do not perform the end-of-day process until the next morning, you should bear in mind that the current date is used as reference value for anonymization.

11 Masking of sensitive data

As part of GDPR requirements, protel will automatically mask certain data which has been defined as sensitive. Standard fields in protel that fall under this category are:

- ▼ Passport Number
- ▼ Driver's License
- ▼ ID Numbers

Every user will be able to enter these fields as new. However once they have been entered, they will be partially masked.

ⓘ **Only users with assigned permissions will be able to see the masked sensitive data of the guest. For all other uses, it will always appear masked.**

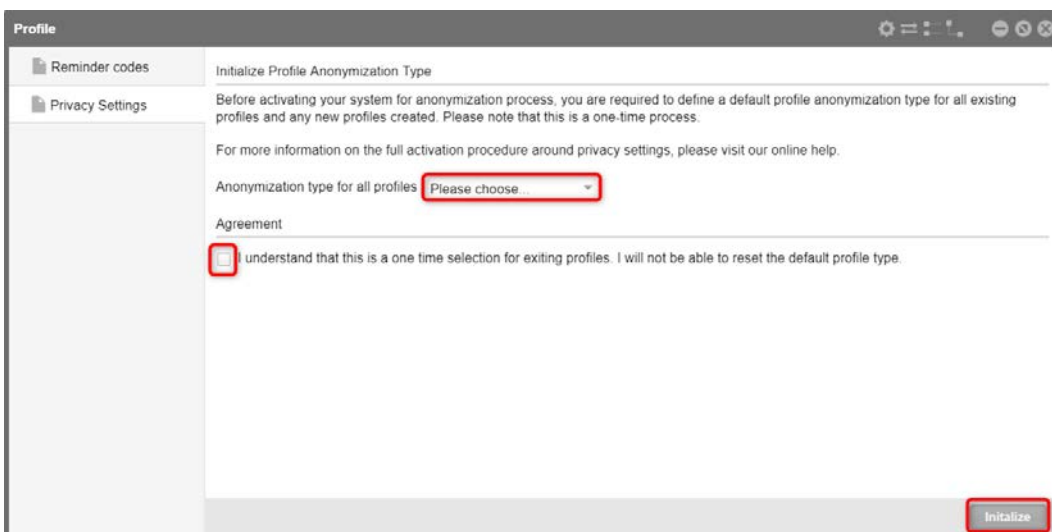
The required right is 'PAirSensitiveGuestDataView' and is part of the pAir Front Office role (see section 12 'New user permissions').

12 New user permissions

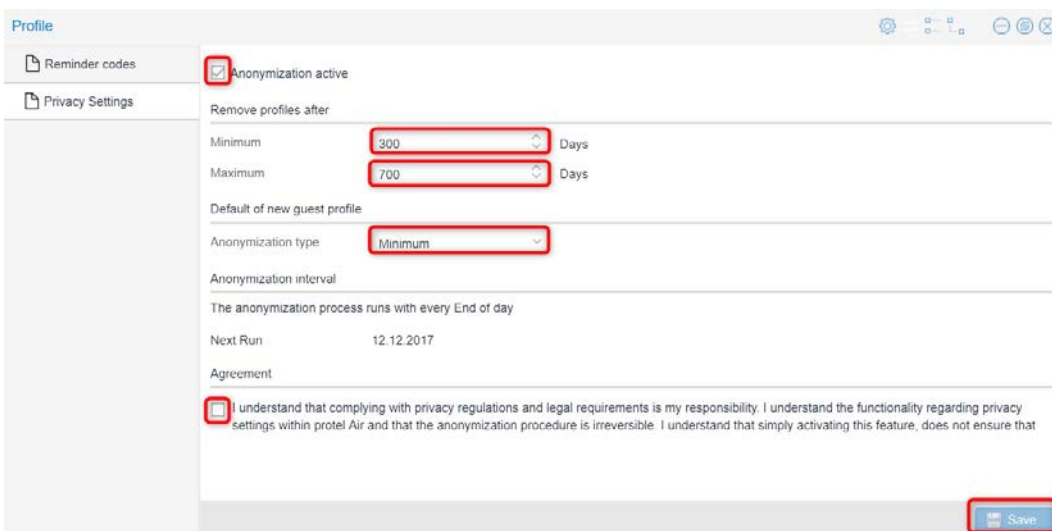
As there are many new GDPR-relating features and functions, we also have released new permissions attached to these fields for you to be able to control the privacy of your guests more easily. You will find the following new user permissions available in protel Air.

Access to the privacy settings tab (system data)

- PAirSDTabGuestAnonymizationViewOnly –View the Privacy Settings tab (System data - Hotel Management - Guest profile - Privacy Settings). The tab is deactivated if this right is not granted.
- PAirSDEditInitializeGuestAnonymization –This right is required to initialize the anonymization type:

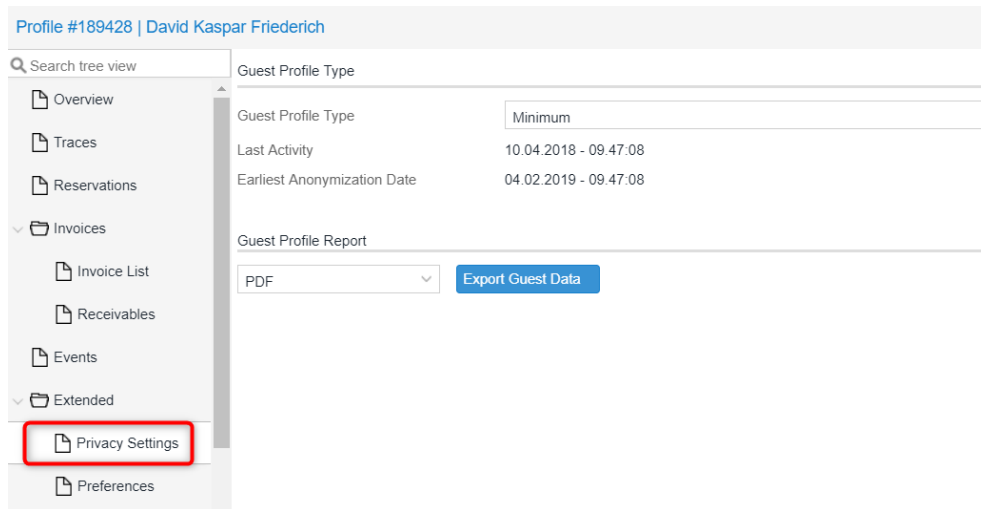


- PAirSDEditActivateGuestAnonymization - This right is required to activate the Anonymization checkbox
- PAirSDEditMinimumDays - This right is required to set the minimum retention period
- PAirSDEditMaximumDays - This right is required to set the maximum retention period
- PAirSDEditNewGuestDefaultMode - This right is required to set the anonymization type
- PAirSDEditPrivacySettingsAgreement - This right is required to tick the disclaimer checkbox
- PAirSDSavePrivacySettings - This right is required to save the Privacy Settings



Access to the profile's Privacy Settings

- ▼ PAirTabGuestPrivacySettings / PAirTabGuestPrivacySettingsViewOnly – This right is required to access the content of the tab. If this right is missing, the Privacy Settings tab is greyed out.
- ▼ PAirEditGuestAnonymizerMode – This right is required to set a guest profile type.
- ▼ PAirCreateGuestProfileReport - This right is required to start the guest data export.



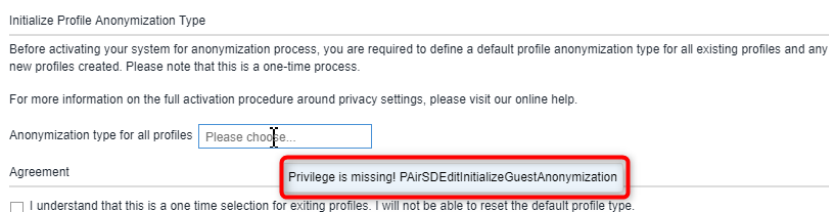
Access to sensitive data in Guest profile

- ▼ PAirSensitiveGuestDataView – If this right is not granted, sensitive guest data will be masked.
- ▼ PAirViewPassport
- ▼ PAirEditPassport
- ▼ PAirTabDocuments
- ▼ PAirTabDocumentsViewOnly
- ▼ PAirAddDocument
- ▼ PAirEditDocumentType
- ▼ PAirRemoveDocumentType

❗ After anonymization, the user right PAirAddPassport is not working anymore

Indication of missing rights

If your user does not have the right to perform a certain function, you will receive a message similar to the following:



13 Other preparations

In order to inform your customers about their privacy rights and how you are handling their information, we suggest that you start to organize and formulate what you want to communicate. We recommend that you use your registration card and your Terms and Conditions for this purpose.

14 About protel documents

<p>Symbols used in this documentation</p>	<ul style="list-style-type: none"> ▼ Background information and further information ▼ Please note: Important!
<p>Please check: Is this the latest version?</p>	<p>Should you notice that certain processes described in this document seem “incorrect”, it is possible that you may not be using the latest version of this document.</p> <p>All our documents are continuously being updated in accordance with the ongoing development of the respective software. Should you be unsure about whether you are using the latest document, please feel free to contact us at documentation@protel.net. Your questions or suggestions are always welcome!</p>
<p>Feedback</p>	<p>If you are sure that you are using the latest version and still cannot find certain information or find the descriptions unclear, please write to documentation@protel.net.</p> <p>If your Support Team is not via protel HQ in Dortmund, Germany, please contact your reseller directly.</p>
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