



CENTERCODE
DELTA'20

Personal Data in Customer Validation

Get a high-level overview of personal data issues in Customer Validation

About Me

Monica Burick

Corporate Counsel
Centercode

Areas of Focus - All Things Legal

Special Interest - Compliance and Privacy

✉ monica@centercode.com

🌐 [linkedin.com/in/monica-burick-b6651020/](https://www.linkedin.com/in/monica-burick-b6651020/)





The content provided in this presentation is for general information and awareness only. It is not intended to convey or constitute legal advice and is not a substitute for obtaining legal advice, which we cannot provide to you. You should consult with your own internal and/or external counsel and privacy team to become familiar with the issues that apply to your organization and how your organization intends to address them.

Agenda



- 1 What is Personal Data?
- 2 Personal Data in Customer Validation
- 3 Personal Data Best Practices in CV
- 4 Centercode Platform Features

1. **What is Personal Data?**
2. Personal Data in Customer Validation
3. Personal Data Best Practices in CV
4. Centercode Platform Features

What is Personal Data



Generally - Personal Data is information that when used alone or along with other data can identify an individual

Directly Identifying - Passport or SSN

Indirectly Identifying - Date of Birth

Different Laws Have Different Definitions

Your organization likely has its own definition by policy

What is Personal Data

European Union General Data Protection Regulation (GDPR) - “Personal Data”

Information relating to an *identified* or *identifiable* natural person.

An “identifiable natural person” is a person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

What is Personal Data



California Consumer Privacy Act (CCPA)

The CCPA uses the term “Personal Information,” which is defined as information that identifies, relates to, describes, or is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer **or household**.

California Online Privacy Protection Act (CalOPPA)

Information about a consumer collected online and maintained by the operator in an accessible form, including (1) **first and last name**; (2) **home or other physical address**, including street name and name of a city or town; (3) **email address**; (4) telephone number; (5) social security number; (6) any other identifier that permits the physical or online contacting of a specific individual; (7) information concerning a user that the web site or online service collects online from the user and maintains in personally identifiable form in combination with an identifier described in this list (this includes passively collected information like device identifier or geolocation data)

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Personal Data and Customer Validation



Collection of person information in CV is critical

Adopting best practices when collecting personal information...

- Builds trust with your test community

- Reduces data breach risk, and

- Assists your organization with compliance

Need to Comply with the Law



Ensure compliance with state data privacy laws such as CalOPPA and CCPA

Consider applicability of federal COPPA

Consider applicability of foreign laws like GDPR

Special Laws/Regulations - HIPAA, PCI, EU “Sensitive” Personal Data



Need to Comply with the Law Cont.

Roles in Personal Data Legal Compliance:

Data Controller

Data Processor



Need to Comply With Your Policies



Company internal policies typically cover Personal Data

Internal policies also cover security requirements

Company privacy policies cover Personal Data

Your test participant NDAs and agreements often cover tester Personal Data



Need to Meet Tester Expectations



What expectations do you set during onboarding about how you will collect, use and share their personal data?

Will your testers expect to be contacted for reasons other than matters related to the test?

When conducting CV, do you put a privacy policy or notice explaining your data collection, use, and sharing of personal data in front of your actual and prospective testers?

Do you use a test participation agreement that explains your personal data policy?

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Best Practices

- ✓ Collect only what you can justify
- ✓ Use Personal Data collected in CV limitedly if possible
- ✓ Design your procedures around the sensitivity of the data
- ✓ Consult your internal policies and legal/privacy teams
- ✓ Keep track of the location(s) of your Personal Data
- ✓ Build test participant trust with clear communication

Collecting What You Can Justify



Consider current and future objectives when creating profile questions for test community

Example - date of birth or just age range

Consider test objectives when creating test questions

Encourage use of non-identifying usernames/avatars

Limit Use of CV Personal Data



What is your test participant expecting for use?

Might you discourage participation with over-contact/use?

Be careful about “Do Not Sell” requirements in California.

You want to build a happy Customer Validation community!

Design Procedures Around Data



“Privacy by Design”

Are you collecting highly sensitive or less sensitive data?

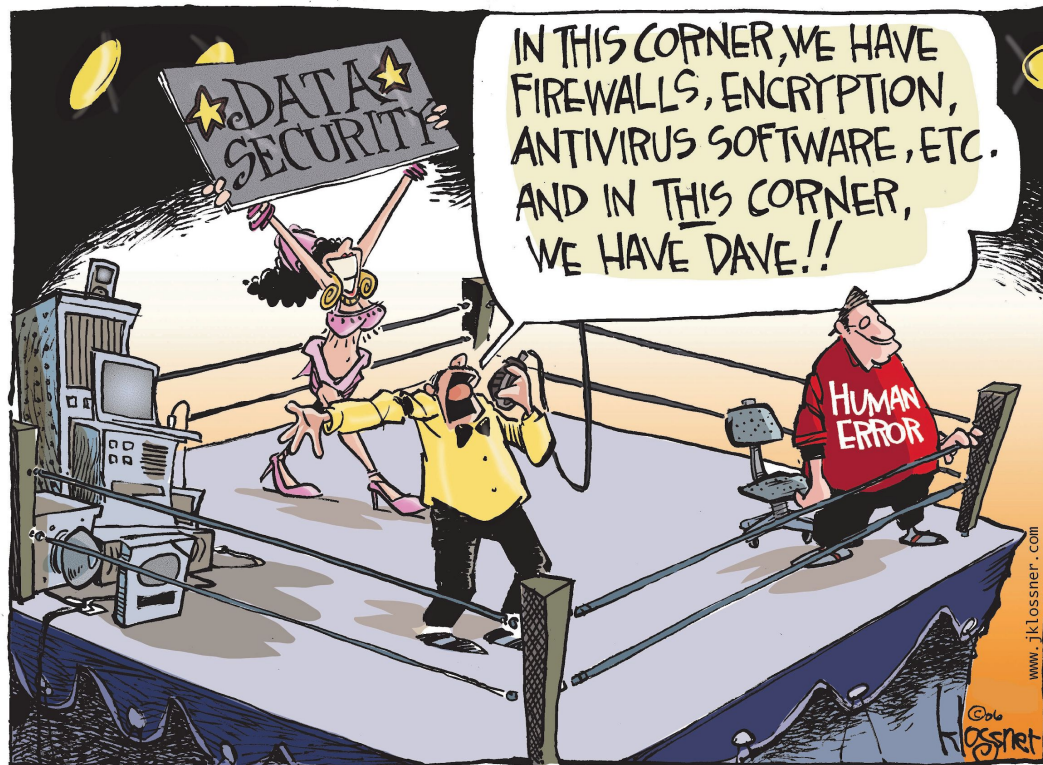
Should your data remain in a secure data center?

Centercode Platform has options available to clients

Design Procedures Around Data

And...

Make sure you
train your staff.



Consult Legal/Privacy Teams

Consult your legal/privacy teams

Discuss the Personal Data you are gathering (list categories) and from whom (age, state and country of residence, special demographic)

Encourage a realistic risk discussion (you aren't collecting bank information)



Consult Legal/Privacy Teams Cont.

Coordinate with security team for special requirements

Review privacy policy and determine if another privacy notice or test participation agreement is required

Consider a comprehensive Test Participation Agreement (TPA)



Consult Legal/Privacy Teams Cont.



New company with limited resources?

Use common sense to adopt basic security and privacy policies and tester agreements/communications (password, clean desk, data storage, etc.)

Look at what other similar companies do for privacy

Use a third party provider for Customer Validation

Keep Track of Location of Personal Data



Set a policy for location of Personal Data (and backups) and train staff to comply

Remove data from this location in anonymous form (e.g. reporting with first name, last initial)

Collect Personal Data within your CV database in the locations that you have determined you are going to collect it

Maintain a data map where required by law (GDPR) or your policies, or where justified by the sensitivity of the data

Build Trust with Tester Community

Short summary for testers of key obligations, requirements, and privacy

Post a privacy notice where you collect their Personal Data

Provide testers with a way to opt out / delete data

Do not break expectations by sales contact



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Centercode Platform Features



You can restrict Personal Data collection to user “account” data and custom user “profiles”

This allows ease of access to Personal Data by users and administrators

This is key to opt-out and user deletion features of the platform

Centercode Platform Features Cont.



Test Participation Agreement Execution

transfer of your Personal Information to the United States or America and any other country in which [REDACTED] operates or processes this data, which country or countries may not offer the same legal protections offered in your country of residence or origin, and which may be deemed by your country of residence or origin to offer insufficient legal protections.

9. Miscellaneous. If any part of this Agreement shall be invalid or unenforceable, such invalidity or unenforceability shall not affect the validity or enforceability of any other part or provision of this Agreement, which shall remain in full force and effect. This Agreement may not be modified or amended except by the written agreement of both parties. This Agreement does not supersede, replace, or modify the [REDACTED] Agreement, which is between you and [REDACTED].

10. Execution. Please keep in mind that participation and compliance with all agreements will be enforced throughout the Test. Failure to comply will result in disqualification from further testing opportunities and disqualification from receiving any thank-you gift that may be offered to any testers, in addition to possible enforcement action by Centercode and/or [REDACTED].

By clicking "Yes" below, you are stating your have reviewed the agreement.



Centercode Platform Features Cont.



Executing Test Participation Agreement Highlights

Final Agreement

- I, Mike Fine, confirm that I understand, and agree to comply with, the terms of the Test Participation Agreement.
- I, Mike Fine, agree to participate in the test.
- I, Mike Fine, consent to the transfer of my personal information to Centercode and [REDACTED] in the United States and any other jurisdiction in which [REDACTED] has business operations.
- I, Mike Fine, affirm that I am at least 18 years old and have full authority to sign (accept) this Agreement.
- I, Mike Fine, confirm that the registration, qualification, and contact information that I provided or will provide to Centercode, Betabound, and/or [REDACTED] is true, complete, and accurate, including but not limited my statements regarding my true identity and contact information.
- By entering your username and password below, you state that you have read and agree to the Test Participant Agreement and the aforementioned terms.

Centercode Platform Features Cont.



Please note the following:

- Personal data will be shared with our client, [REDACTED] per the agreement. (Sec. 8). This data will remain private and only shared with our client for the purposes of quality testing.
- [REDACTED] is a U.S. based corporation.
- As part of the Beta Test, your data will be transferred to the United States of America.
- Unless otherwise stated explicitly, under no circumstances should you attempt to sell your beta product, post about your beta product on social media, or indicate that you participated in this beta, before the project starts, during the project, and after the project ends.

▲ Modify Insert Above Move Up Move Down Remove

I have read and agree to the Test Participant Agreement. *

☐ Yes ☐ No

▲ Modify Insert Above Move Up Move Down Remove

I understand and give my express consent that any personal data that I provide as part of the Beta Test, will be transferred to the US. *

To learn more about data privacy for this beta test, see [REDACTED] [Privacy Statement](#)

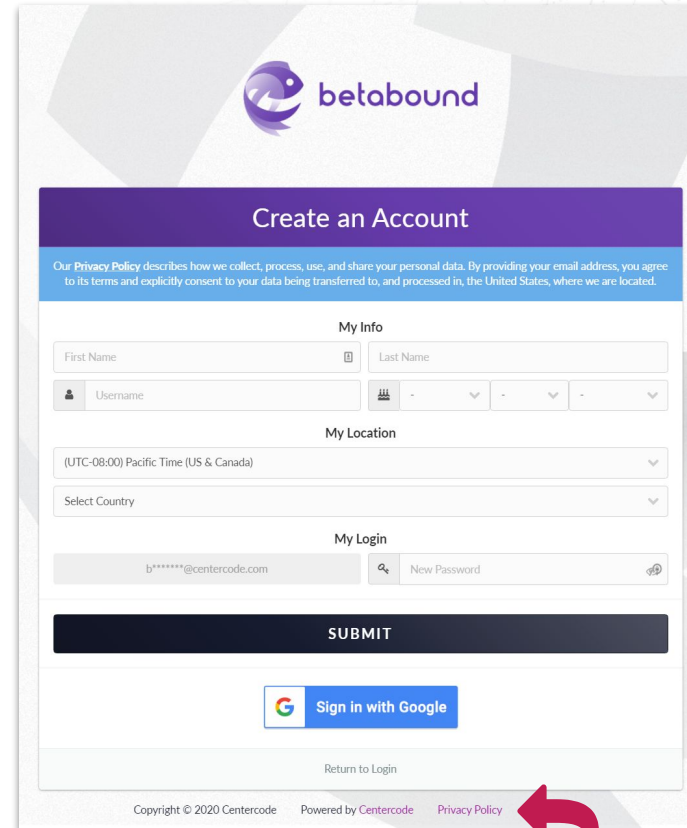
☐ Yes ☐ No



Survey Tool
(for unusual
compliance needs)

Centercode Platform Features Cont.

Privacy Policy Link



betabound

Create an Account

Our [Privacy Policy](#) describes how we collect, process, use, and share your personal data. By providing your email address, you agree to its terms and explicitly consent to your data being transferred to, and processed in, the United States, where we are located.

My Info

First Name Last Name

Username

My Location


(UTC-08:00) Pacific Time (US & Canada)

Select Country

My Login

New Password

SUBMIT

 Sign in with Google

[Return to Login](#)

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Centercode Platform Features Cont.



Notice Upon Initial Registration for Community

docs.google.com/document/d/1w...

Welcome to Betabound!

We're glad you're interested in joining our tester community. Your feedback will help shape and improve products from some of the [biggest names in tech](#) before they are launched to the public.

[Anyone can be a Betabound tester](#). Our clients look for individuals from all sorts of backgrounds, so there's no "techie" experience required besides enjoying the tech products that you already use!


To get started, you'll need to create an account. Once that's done, you can start applying to our tests. You'll also start receiving emails about upcoming tests that are relevant to you so you can apply quickly for the ones that interest you.

Let's get started!

Our [Privacy Policy](#) describes how we collect, process, use, and share your personal data. By providing your email address, you agree to its terms and explicitly consent to your data being transferred to, and processed in, the United States, where we are located.

Email Address

AGREE AND VERIFY EMAIL ADDRESS

 **Sign in with Google**

[Forgot Password?](#) [Use a Key](#) [View My Agreements](#)

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Centercode Platform Features Cont.



Date of Birth Feature

A screenshot of the Centercode BetaBound "Personal Account Settings" page. The page has a dark blue header with the "betabound" logo and a user profile icon labeled "BRAD DAY". Below the header is a teal navigation bar with the text "Personal Account Settings". On the left is a sidebar menu with categories: "TEST PLATFORMS" (Manage Platforms, Add a Platform), "PERSONAL PROFILE" (Account Settings, User Profiles), "RESOURCES" (Announcements), "USER REFERRALS" (Refer a Friend), and "BETABOUND" (Contact Us). The main content area is titled "Personal Account Settings" in a purple header. It contains three sections: "My Info" with fields for Name (Brad), Day (Day), and Date of Birth (Brad, May 8, 1985); "My Location" with dropdowns for Time Zone (UTC-08:00 Pacific Time (US & Canada)), Country (United States), State (California), and City (Orange); and "My Login" with fields for Email (brad@centercode.com) and Password (Existing Password), plus a "Change Password" checkbox. On the right side of the main content area, there are two sections: "OPT-OUT" with a "Remove Your User Account" link, and "AGREEMENTS" with a "View My Agreements" link. A large red arrow points from the "Date of Birth" field in the "My Info" section towards the right. At the bottom of the page, there is a footer with the text "©2020 Betabound by Centercode" and "Powered by Centercode".

Centercode Platform Features Cont.



Personal Data-Free Reporting

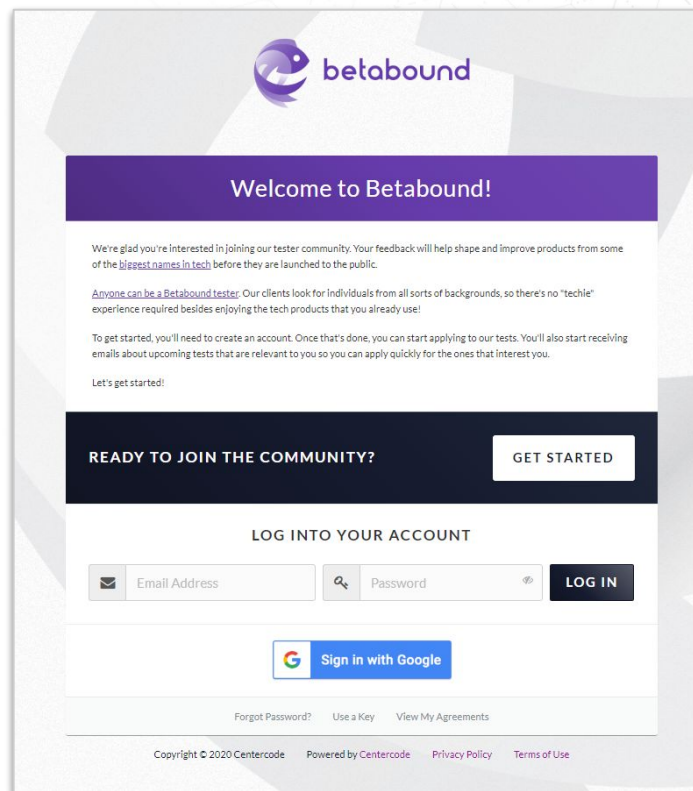
PII Safe Example

ID	Title	Topic	Submitter First L. Name	Impact...
TEST-0001	Liveview Doesn't Initialize When App First Opens	Live Video Streaming	Emil J.	144
TEST-0039	App Constantly Crashing on iOS	Installation	Autumn W.	97
TEST-0005	<i>Receiving Person Alerts When No One is Around</i>	<i>Person Alerts</i>	<i>Autumn W.</i>	53
TEST-0008	Loud Click Caused by Switching to Nightmode cited as 'Heard a Noise'	Night Vision	Kelly R.	49
TEST-0012	Camera Mount Swivel is Flimsy	Installation	Diego A.	47
TEST-0026	<i>Camera Lens Easily Gets Foggy from Moisture</i>	<i>Live Video Streaming</i>	<i>Austin S.</i>	43
TEST-0015	Artifacts in Night Vision Live Video	Night Vision	Mike K.	42

Centercode Platform Features Cont.



SSO Integration



Centercode Platform Features Cont.



IP-Address Based Jurisdictional Blocking

Community Trade Compliance Settings

Allowed Countries

- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island And Mcdonald Islands
- Holy See (vatican City State)
- Honduras
- Hong Kong
- Hungary

Blocked Countries

- North Korea
- Iran

IP ADDRESSES / RANGES

Blocked ▼ ADD

IP/Range	Type	Remove
IP/Range rules have not been set.		

BLOCK RESPONSE

☒ Redirect to URL

☐ Message

Thank You!



Monica Burick

✉ monica@centercode.com

in [linkedin.com/in/monica-burick-b6651020/](https://www.linkedin.com/in/monica-burick-b6651020/)

