



Liferay DXP & Data Protection

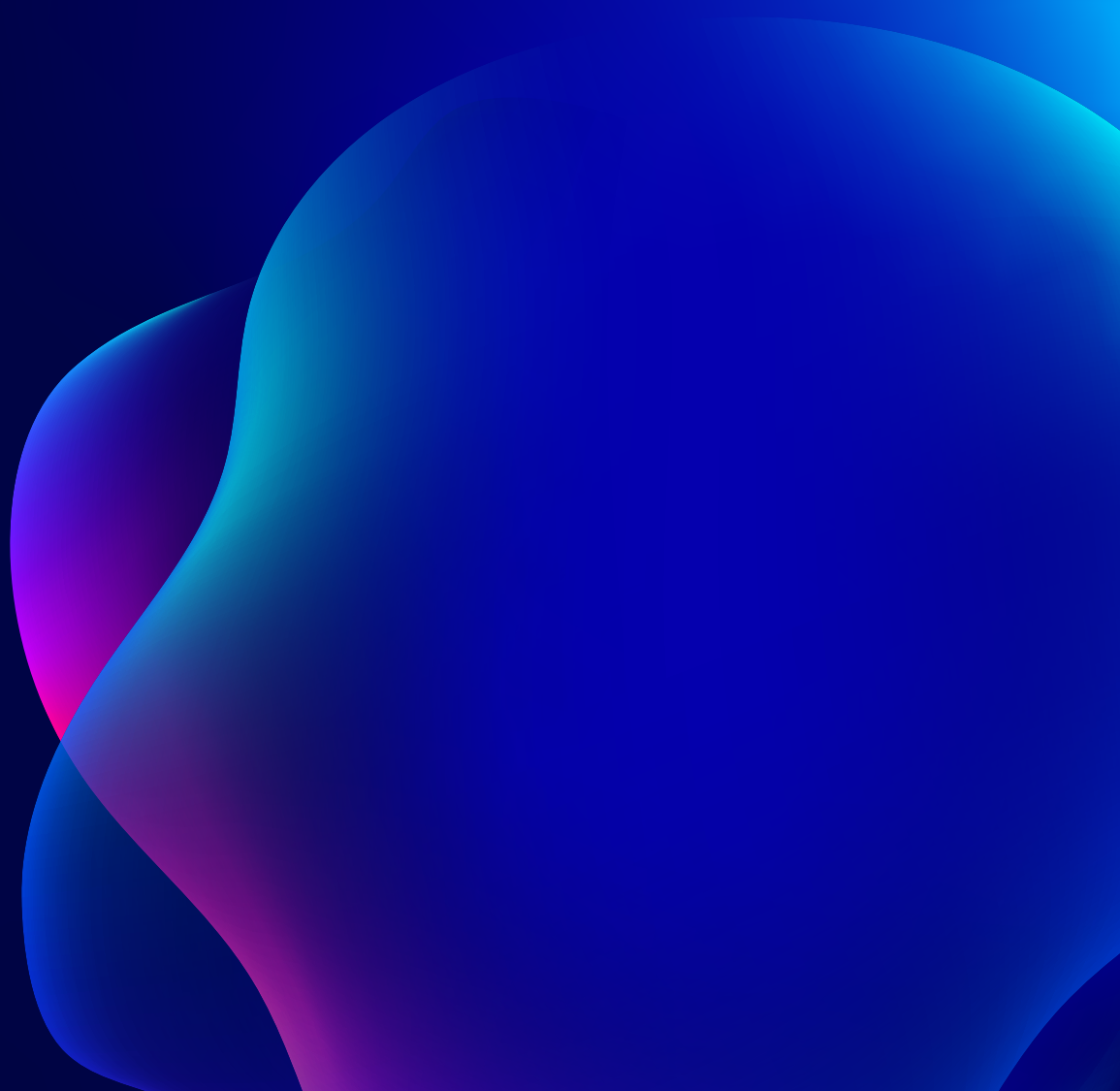


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Introduction

As a strategic vendor to many of the largest companies in the most compliance-driven industries, including the public sector, healthcare and financial industries, Liferay is committed to providing world-class product solutions and services. To optimally support organizations, Liferay aims to assist its customers and partners in meeting the increasing amount of regulatory requirements. As our society is increasingly influenced by broadly available information and digitalization, data protection has become a major concern for many individuals and the subject of many national and international laws and regulatory frameworks.

Companies have learned to effectively protect their sensitive, but non-personal, data by establishing compliance frameworks for their vendors, for example, Non-Disclosure Agreements among other contractual agreements. These frameworks and requirements have been largely standardized in the industry and Liferay has also been able to establish corresponding policies and procedures. However, businesses now need to take into consideration new regulatory requirements regarding personal data, such as the European General Data Protection Regulation (GDPR), the California Consumer Privacy Act (CCPA), the Brazilian Lei Geral de Proteção de Dados (LGPD) and many others. While these are different laws and regulations, they all have some common requirements.

Therefore, as businesses implement data protection compliance programs and continue to work on converting existing data protection best practices to the new regulatory environment, Liferay recommends reviewing vendors and documenting if and how any personal data may be processed as part of the relationship.

Even though Liferay DXP is a premise-based solution and does not process personal data, it could become part of your broader application or project that itself will process data. With that in mind, you should consider if including Liferay DXP in your projects will have any impact on meeting your compliance goals.

This document is intended to provide answers to the following two questions:

1. Can Liferay Subscription Services be used in compliance with personal data protection requirements?
2. Can Liferay software products be used within projects and be in compliance with personal data protection requirements?

Liferay's General Approach

As a general approach, Liferay aims to avoid processing personal data not necessary for offering services. By minimizing the volume of data collected in the first place, the amount of data needing to be disclosed is also lessened. This is both the most basic and the most effective way to protect personal data. Therefore, data minimization is one of the most important, if not the core, principle of effective data protection.

Not collecting and transmitting personal data has several advantages with respect to managing your vendor relationships under data protection compliance programs. While not an exhaustive list, these advantages include not needing to:

- Create another entry in your record of data processing activities
- Enter into separate contracts with vendors governing the processing of personal data
- Continually verify and audit the vendor's compliance

In addition to effectively ensuring compliance, minimizing the data that needs to be disclosed is also the most cost-effective and resource-friendly approach.

Liferay Services

Following the above mentioned premise, Liferay is committed to offering its services and enabling usage without having to disclose personal data. For this reason Liferay customers will find in Section 13.10 of our Enterprise Services Agreement¹ a written confirmation that their use of Liferay services does not require providing, disclosing or giving access to personal data (aside from necessary contact data to establish a contractual relation). Customers can refer to this section when documenting their compliance under their respective compliance programs. In order to provide some additional background information and in anticipation of additional due diligence questions that our partners and customers may have, below is additional background on how Liferay enables its customers to use Liferay's Subscription Services without having to disclose personal data.

¹ Enterprise Services Agreement

Liferay Help Center

In general, using the Help Center does not require any personal information. Liferay allows you to register with details that identify only the company and will not lead to a specific individual. However, if a user decides to register using their personal data, the personal data will be processed for purposes of fulfilling Liferay's contractual obligations to the customer and in accordance with Liferay's Privacy Policy².

Support Tickets

Support Tickets may be accessed by using a non-personal email address that only points to the customer's company name, but does not identify a specific individual. The data our support team will ask for is either non-personal data or anonymized data. You may anonymize your data in accordance with your internal policies. If you are not sure how to anonymize databases, please refer to our knowledge base³. The files Liferay Support most commonly needs to address support tickets are:

- **Log files:** Files that record events that occur in the software. These do not record personal data, only technical data from a specific software installation.
- **Database dumps:** There are cases which require our support team to directly inspect a database. It is not necessary that Liferay see personal data in the database content, so Liferay asks the customers to erase all data or such data that may allow identification of individuals prior to providing database dumps.

Liferay DXP Software

As outlined above, Liferay is committed to providing products that work without the disclosure of personal data and facilitate your journey towards data protection compliance. Liferay understands that you need software products that meet the high standards of data protection compliance.

This section describes how Liferay products provide a highly flexible, open-source platform with robust data protection (see Article 25 GDPR⁴) and data security capabilities (see Article 32 GDPR⁵). You will find examples of how Liferay customers have been using the software to support their data protection strategy.

² Privacy Policy

³ Anonymizing Data

⁴ Data Protection by Design and Default

⁵ Security of Processing

Privacy by Design & Default

Liferay products are designed to provide an enterprise-ready platform including the capability to protect the privacy of end users. Customers using the Liferay platform have access to a rich set of functionalities to build solutions that are able to anticipate risks and prevent incidents before they occur. While these features enhance data protection, you should not assume compliance is achievable by simply deploying “GDPR-compliant” technology products. Full compliance requires a holistic approach of embedding data protection into both technical infrastructure and organizational processes that by nature can never be delivered by a standard software product alone. Your compliance will therefore depend on whether you build your solutions in accordance with applicable data protection laws and regulations. Functionalities within Liferay products that will support you in this endeavor include:

Roles and Permissions

Liferay products provide granular control over assigning roles and permissions to appropriate users. This ensures that only authorized users can access sensitive data. By default, new users on Liferay are granted a minimum set of permissions, following the principle of “least privilege.” Administrators can grant additional permissions as needed. Refer to the documentation about roles and permissions⁶ for more details.

User Management

The ability to access, review and modify a user’s personal data is a core requirement of the GDPR. Administrators with sufficient privileges can use Liferay’s user management application to edit personal details or assign roles for a particular user. Users can be disabled or deleted and regular users can edit their own profile information. Refer to the documentation on user management⁷ for more details.

Search

Liferay’s powerful search capabilities can aid in discovering where personal data resides on your servers as almost all content created or uploaded by users is indexed and searchable. Liferay’s search feature will even index the content of documents like PDFs and Word files. Refer to the documentation about Liferay search⁸ for more details.

⁶ Roles and Permissions

⁷ User Management

⁸ Search

Tags and Categories

All assets within Liferay can leverage the Asset Framework, which provides a flexible taxonomy system for tagging and categorizing content. Personal data can be marked for quick retrieval for situations where data must be reviewed or modified. Refer to the documentation about organizing content using tags and categories⁹ or about asset framework¹⁰ for more details.

Customization

In addition to providing a platform for building new applications, Liferay's existing functionality is highly customizable and extensible to meet your compliance requirements. For example, you can modify the default fields in a user's profile or remove users from a mailing list when they withdraw consent. Refer to the documentation on customizing¹¹ for more details.

Security

Data security is a prominent requirement of GDPR. Liferay implements enterprise-grade application security features to ensure your data is secure. This includes a robust entitlement management system, strong password encryption, configurable password policies, SSO integration and more. Details can be found in our documentation on security¹² and our whitepaper on Liferay DXP Application Security Features¹³.

Erasing or Anonymizing a User's Personal Data

To address the right to erasure or the "right to be forgotten", Liferay DXP provides a graphical interface¹⁴ for administrators to review all content that potentially contains personal information and edit, delete or anonymize as needed. An API is also provided to tailor how personal information is identified and handle personal information on custom applications.

Exporting a User's Personal Data

The right to data portability requires organizations to provide a machine-readable export of a user's personal data upon request. Liferay DXP provides a graphical interface¹⁵ and API for administrators to export a user's personal data per application in XML format.

⁹ Organizing Content with Tags and Categories

¹⁰ Asset Framework

¹¹ Customizing

¹² Liferay Portal Security

¹³ Liferay DXP Application Security Features

¹⁴ Sanitizing User Data

¹⁵ Exporting User Data

Cookies in DXP

DXP only stores cookies necessary for the core functionality of the platform. A normal deployment of Liferay DXP stores two types of cookies:

- 1. Session cookies:** Cookies used to maintain a user's session. These temporary cookies are deleted after the browser session ends.
- 2. Preferred language cookie:** A cookie used to store the user's preferred language. This cookie is persisted so the user's preferred language will be used in future sessions.

Certain DXP applications and features will also store cookies necessary to function. For example, if a user checks "Remember Me" on the login page, DXP will store encrypted cookies containing the user's login and password. Details about Liferay DXP cookies, including their categorisation, retention term and description can be found in our documentation¹⁶.

Out-of-the-box Liferay DXP does not store cookies to track user behavior, build user profiles, track usage statistics, etc.

Liferay provides an out-of-the-box cookie management interface¹⁷, designed to aid customers in establishing compliance with ePrivacy Directive. Liferay DXP also supports management of third party cookies¹⁸.

In addition, customers can find different offers on how to create cookie banners for their websites built on Liferay DXP in our online marketplace¹⁹.

As part of any wealth management firm's efforts to enhance its digital client service, it's critical to ensure that these changes positively impact your KPIs, or key performance indicators. Make sure to incorporate a regular assessment of tactics and channels to implement improvements and build out an experience that will actually be beneficial for most of our clients.

Contact Us

If you have other questions regarding your use of Liferay products, contact us at sales@liferay.com.

¹⁶ Liferay DXP Cookies

¹⁷ Enabling Compliance for Cookies

¹⁸ Managing Third Party Cookies

¹⁹ Marketplace search results for "cookie"



Liferay helps organizations build for the future by enabling them to create, manage, and scale powerful solutions on the world's most flexible Digital Experience Platform (DXP). Trusted globally by over a thousand companies spanning multiple industries, Liferay's open-source DXP facilitates the development of marketing and commerce websites, customer portals, intranets, and more. Learn how we can use technology to change the world together at liferay.com.

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