

# GDPR and Data Subject Requests

Section	Description
Feature Area	Platform Operations / Compliance
Navigation	API-based (Developer Center) — no dedicated Admin UI page
Alt Navigation (Audit Viewer)	<a href="#">Admin → Troubleshooting → Audit Viewer</a> (for change-event monitoring)
Primary Function	Enable organizations to respond to data subject requests for access, rectification, and deletion of personal data under GDPR, CCPA, and similar regulations
Genesys Role	<b>Data Processor</b> (under GDPR Article 28) — customers are the <b>Data Controllers</b>

## Study Notes

Topic	Explanation
GDPR	General Data Protection Regulation — EU regulation protecting individuals' rights over their personal data
Data Subject	The individual whose personal data is being processed — your contact center's customer
Data Controller	The organization that determines how and why personal data is processed — <b>your organization</b>
Data Processor	The vendor that processes data on behalf of the controller — <b>Genesys Cloud</b>
DPA	Data Processing Agreement — a contract required under GDPR Article 28 between controller and processor; contact <a href="mailto:dataprivacy@genesys.com">dataprivacy@genesys.com</a>
GDPR API	Genesys Cloud's preferred self-service mechanism for customers to respond to data subject requests
Rate Limits	The GDPR API is rate-limited — it is designed for <b>individual requests</b> , not bulk deletion

Topic	Explanation
CCPA	California Consumer Privacy Act — data subject rights are similar to GDPR; Genesys Cloud uses the <b>same GDPR API</b> to respond to CCPA requests
No enabling required	GDPR compliance does not require any Genesys Cloud configuration to be enabled — the GDPR API is available to all customers
No GDPR certification	No official GDPR certification exists for cloud providers; Genesys Cloud maintains compliance through independent reviews (HIPAA audits, etc.)

# The Three Fundamental Data Subject Rights (Relevant Articles)

GDPR Article	Right	GDPR API Request Type
Article 15	Right of Access	<b>Export</b> — retrieve all personal data Genesys Cloud holds for this subject
Article 16	Right to Rectification	<b>Update</b> — correct/update personal data
Article 17	Right to Erasure ("Right to be Forgotten")	<b>Delete</b> — remove or anonymize personal data

“ When the request type is **Delete**, some services may **anonymize** personal data rather than fully delete it, depending on the service. Processing happens **asynchronously** — the request is created and initiated but may not complete immediately.

## GDPR API — Two Endpoints

### 1. Subjects Endpoint

Used to **identify** which subjects match a given search term before submitting a request.

Attribute	Detail
Purpose	Find which individuals a search term matches — reduces risk of accidental data changes
Accepted search term types	Name · Address · Phone number · Email address · Social media handle
Returns	List of matching subjects — each is a <code>userId</code> , <code>externalContactId</code> , or <code>dialerContactId</code>
Best practice	<b>Always use subjects endpoint first</b> before submitting a requests endpoint call

## 2. Requests Endpoint

Used to **initiate** an actual GDPR request (Get, Export, Update, or Delete).

Attribute	Detail
Accepted search term types	Name · Address · Phone · Email · Social media handle · User ID · External Contact ID · Dialer Contact ID
Request types	<code>Get</code> · <code>Export</code> (Article 15) · <code>Update</code> (Article 16) · <code>Delete</code> (Article 17)
Multiple identifiers	Submit one request <b>per identifier</b> — if a person has name + phone + email, submit three separate requests
ID resolution	If a User ID or External Contact ID is provided, Genesys resolves it to the full record first
Processing	<b>Asynchronous</b>

## Services That Require a Subject to Be Included

The following services require a `subject` (not just a search term) in the GDPR API request:

- **Outbound Dialing**
- **Directory**
- **External Contacts**

# Social Media Search Fields

Channel	Searchable Fields
Twitter / X	<code>screenName</code> (@ handle) · <code>id</code> (account ID)
Instagram	<code>scopedId</code> · <code>handle</code> (username)
Facebook	<code>scopedId</code>
Apple Messages for Business	<code>opaqueId</code> (Apple-generated per-account identifier)

## File Attachments in ACD Interactions

Genesys Cloud does **not** search the contents of file attachments for personal data. Instead:

- A GDPR request using an External ID will find the conversation and any associated file attachments
- On a Delete request, associated file attachments are removed regardless of content
- **Requirement:** ACD interactions containing personal data in file attachments must be associated with a contact profile in **External Contacts** — otherwise they cannot be found via the GDPR API

## Merged Contacts (Single Customer View)

If your org uses the single customer view (contact merging):

Step	Action
Subjects endpoint	May return multiple External Contact IDs for the same person (same merge set)
Identify merge sets	Use External Contacts API — fetch each contact and check <code>canonicalContact</code> field
Requests endpoint	Submit only <b>one request per merge set</b> using the canonical contact ID

Step	Action
Behavior	GDPR API automatically duplicates the request for each contact in the merge set
Related requests	Each related request succeeds or fails independently — inspect each individually

# What Personal Data Should NOT Be Stored in Genesys Cloud

To ensure the GDPR API can locate and manage personal data correctly, avoid storing personal data in these locations:

Location	Why to Avoid
Architect flow names, descriptions, state names, task names, action names	GDPR API cannot search these
Prompt text-to-speech values	Not searchable
Directory personal status	Not searchable via GDPR API
Custom attributes (unless associated with an External Contact)	GDPR API cannot find data in custom variables unless linked to a contact

# Response Timeframes (Approximate)

Request Type	Approximate Processing Time
Access / Export (Article 15)	1-2 days
Removal / Delete (Article 17)	Up to <b>14 days</b>

“ These are approximate values. Actual times may vary.

# Genesys Cloud's GDPR Governance Structure

Role	Responsibility
Chief Privacy Officer	Oversees company-wide data privacy program
European Data Protection Officer (DPO)	Oversees compliance with European data protection law
VP Security & GRC	Security and regulatory compliance oversight
Security & Compliance team	Holds IAPP (International Association of Privacy Professionals) certification

## GDPR and Other Regulations

Regulation	How Genesys Cloud Addresses It
GDPR (EU)	GDPR API; data processor role; DPA available; IAPP-trained staff
CCPA (California)	Same GDPR API handles CCPA data subject requests — no separate configuration needed
HIPAA	Independent third-party audits
PCI DSS	Secure call flows; recording controls; policy exclusions
HDS (France)	Genesys Cloud has undergone independent audit to achieve HDS certification
LGPD (Brazil)	Aligned with GDPR principles

## Best Practices

Practice	Reason
Always use the subjects endpoint first	Identify exact individuals before submitting a modification or deletion request
Submit a request per identifier	If the person has a name, phone, and email — submit three separate requests
Associate ACD interactions with External Contact profiles	Required for GDPR API to locate file attachments

Practice	Reason
Do not store PII in flow names or prompt values	GDPR API cannot search these
Do not use GDPR API for bulk deletion	Rate limits will restrict bulk operations — use the API for individual requests only
Contact <a href="mailto:dataprivacy@genesys.com">dataprivacy@genesys.com</a> for DPA	Required under GDPR Article 28 for organizations subject to GDPR

# Key Takeaways

Topic	Summary
Genesys role	Data <b>Processor</b> — you are the Data <b>Controller</b>
GDPR API	Preferred self-service solution for responding to data subject requests
Two endpoints	<b>Subjects</b> (identify who) → <b>Requests</b> (initiate the action)
Request types	Export (Article 15) · Update (Article 16) · Delete (Article 17)
Delete behavior	Some services anonymize rather than fully delete
Processing	Asynchronous
Rate limits	Designed for individual requests only — not bulk operations
No UI	GDPR API is developer/API-based — no Admin UI page
CCPA	Same GDPR API handles CCPA requests
Timeframes	Access: 1-2 days; Removal: up to 14 days

Revision #1

Created 13 March 2026 17:45:36 by Cesar Gzz

Updated 13 March 2026 17:45:44 by Cesar Gzz