GDPR

SIS Software Products

Introduction

This whitepaper describes important aspects of SIS software products in relation to GDPR.

Disclaimer

GDPR is a regulative for businesses and individuals, not for software products. This document is provided to help our customers in the GDPR process, and is in no way considered to be a complete guide.

Discovery of personal data

First thing you should start with is the to identify and classify personal data in the system. In this document you will find information about the standard locations of personal data in SIS systems, and some hints about other possible locations. Since the systems are configurable and in many ways generic, it is impossible for SIS to guarantee that personal data could not be stored elsewhere. You will therefore need to examine how the systems are being used and have been used in your organization, or even examine the complete database to be sure. Remember that personal data can exist in documents stored in the database.

Documentation

To demonstrate compliance, documentation will be needed. Here are some key starting points:

- Document the personal data in your system.
- Document lifecycles of collected data.
- Document all parties that process the data.
- Document your basis for collecting the data.
- Inform data subjects of their rights and explain how they can exercise them.

Basis for collecting and processing data

Most of the personal data in SIS systems is limited to name, email, phone number and similar information. The identity of the users is usually required and processing is generally limited to storing and reviewing historic information for business and legal purposes. Companies using SIS systems will normally need to clarify the basis for its collection and processing of personal data, and verify that only relevant data is collected and processed. The personal data in SIS system are normally not sensitive, but since the GDPR definition of personal data is wide, we recommend that the basis for collecting and processing data should be well documented and proper consent is collected from data subjects if required.

System architecture considerations

SIS software products are largely based on the same architecture; desktop clients connecting to a database. In most environments, the database is also used by other components like reporting tools, scripts, integrations and more.

Due to this, GDPR measures should be applied on database level and except for the database schema specific details the approach will be similar for all our products.

SIS currently supports Microsoft and Oracle databases, and both platforms provide a rich set of features and tools that can be used to ensure GDPR compliance. Availability of consultancy services, documentation and other resources are vast, and all SIS specific information needed is included in this document.

Rights of data subjects

Data subjects have the right to

a) Access their data
b) Rectification, erase and restrict processing
c) Data portability
d) Object to the use of their data

SIS systems implement “soft” deletes – meaning there is more information in the database than what is seen at application level, so when exporting data to fulfill a) and c) direct database queries should be used to include (soft) deleted data. We consider data portability to be a theoretical situation for SIS applications, but if needed the results from database query results should be straight forward to save to a portable format.

Rectification of data may be performed using the application(s) if the data is not soft deleted, otherwise also here direct database queries should be used.

When modifying data, care should be taken not to break referential integrity. We recommend erasure to be performed by overwriting fields containing personal data with generic/anonymous data.

As mentioned, we recommend that you only collect information you have legitimate reasons to collect and process, thereby keeping the risk of having to modify data to a minimum.

System specific information

Star IPS

Replication issues

If using a replication setup, all queries changing data should be performed on the HUB and replication will update the satellites.

ST_OBJECT table

This table holds contact information in rows with OBJTYPEID = 160:

OBJ_CODE	Last name or similar
OBJ_DESCRIPTION	Full name or similar

These are free text fields.

ST_ADDRPERSON table

This table holds contact information for persons:

ADDRPERS_FREETEXT	Free text information
ADDRPERS_EMAIL	Person email
ADDRPERS_HANDPHONE	Person phone no.
ADDRPERS_HOMEFAX	Person fax no.
ADDRPERS_JOBFAX	Person fax no.
ADDRPERS_HOMEPHONE	Person phone no.
ADDRPERS_JOBPHONE	Person phone no.
ADDRPERS_DEPARTMENT	Department
ADDRPERS_TITLE	Title
ADDRPERS_NAME	Name

If you want to list all contacts for a company, you should join the table ST_OBJECT on

ST_OBJECT.OBJECT_ID = ST_ADDRPERSON.ADDR_OBJECT_ID

and the company identificatory is found in ST_OBJECT.OBJ_CODE and ST_OBJECT.OBJ_DESCRIPTION.

ST_EVENTCONSEQUENCE table

This table holds personal data for event consequences:

EVCONS_PERSON_SEX	Sex
EVCONS_PERSON_BIRTHDATE	Birth date
EVCONS_PERSON_NATIONALITY	Nationality
EVCONS_PERSON_RANK	Rank
EVCONS_PERSON_NAME	Name

These field are free text.

ST_HAWBAHEAD table

This table holds person names related to house airway bill:

HAWB_APPROVEDBY_PERS	Person name
HAWB_RECEIVEDBY_PERS	Person name
HAWB_SHIPPEDBY_PERS	Person name
HAWB_CREATEDBY_PERS	Person name

These fields are free text.

ST_MATTRANS2 table

This table holds 2 fields

MATTR_PERS_LASTNAME	Person name
MATTR_PERS_FIRSTNAME	Person name

These fields are free text.

ST_PERSONPLANT table

This table holds fields that may be considered personal data:

PERSPLANT_BUNKNO	Bunker number
PERSPLANT_DISPORT	Disembark port
PERSPLANT_EMBPORT	Embark port
PERSPLANT_DISEMBARK	Disembark date
PERSPLANT_EMBARK	Embark date

The related person is found by joining with the table ST_OBJECT on

ST_OBJECT.OBJECTID = ST_PERSONPLANT.PERS_OBJECT_ID.

ST_PERSONPLANTHIST table

This table holds fields related to persons:

PERSPLANT_PASSPORTNO	Passport number
PERSPLANT_LASTNAME	Last name
PERSPLANT_FIRSTNAME	First name
PERSPLANT_BUNKNO	Bunker
PERSPLANT_RESOURCEID	Resource
PERSPLANT_POSITION	Position
PERSPLANT_DISPORT	Disembark port
PERSPLANT_EMBPORT	Embark port
PERSPLANT_DISEMBARK	Disembark date
PERSPLANT_EMBARK	Embark date

The related person is found by joining with the table ST_OBJECT on

ST_OBJECT.OBJECTID = ST_PERSONPLANTHIST.PERS_OBJECT_ID.

ST_PERSONS table

This table holds fields related to persons:

PERS_LIFEBOAT	Lifeboat
PERS_BUNKNO	Bunker
PERS_DISPORT	Disembark port
PERS_EMBPORT	Embark port
PERS_DISEMBARK	Disembark date
PERS_EMBARK	Embark date
PERS_EMAIL	Email
PERS_HOMEFAX	Fax
PERS_HANDPHONE	Phone
PERS_PHONEEXT	Phone

PERS_HOMEPHONE	Phone
PERS_AIRPORT	Airport
PERS_ZIP	Zip
PERS_STATE	State
PERS_CITY	City
PERS_STREET	Street

The related person is found by joining with the table ST_OBJECT on

ST_OBJECT.OBJECTID = ST_PERSONS.PERS_OBJECT_ID.

ST_PERSPERSONAL table

This table holds fields related to persons:

PERS_NOKEMAIL	Email
PERS_NOKFAX	Fax
PERS_NOKPHONE	Phone
PERS_NOKZIP	Zip
PERS_NOKSTATE	State
PERS_NOKCITY	City
PERS_NOKSTREET	Street
PERS_NEXTOFKIN	Next to kin
PERS_LANGUAGES	Languages
PERS_PASSPORTNO	Passport number
PERS_SOCIALSECNO	Social security number
PERS_BIRTHPLACE	Birth place
PERS_BIRTHDATE	Birth date

The related person is found by joining with the table ST_OBJECT on

ST_OBJECT.OBJECTID = ST_PERSPERSONAL.PERS_OBJECT_ID.

Various tables with single free text fields

This table lists tables with a single free text fields normally used to identify personal data:

Table	**Field**	**Comment**
ST_POAHEAD_STATUS	PO_STATUS_PERS_NAME	Person name
ST_POAITEM_PROCESS	POAITEM_STATUS_PERS_NAME	Person name
ST_POAITEM_RECEIPT_IPS	POITEM_RECEIPT_PERS_NAME	Person name
ST_POAITEM_RECEIPT_WH	POITEM_RECEIPT_PERS_NAME	Person name
ST_TRANSPORTATION_TRACE	PERS_NAME	Person name
ST_TRHEAD	TR_ATTENTION_PERS	Person name
ST_TRHEAD_STATUS	TRSTATUS_PERS_NAME	Person name
ST_TRITEM_STATUS	TRISTATUS_PERS_NAME	Person name
ST_CURRENTUSER	PERS_NAME	Person name
ST_APPUPDATEHOST	UPD_HOSTNAME	Host system Name
ST_APPUPDATEHOST_LOG	UPD_HOSTNAME	Host system Name
ST_AUDIT	AUDIT_AUDITORNAME	Person name
ST_CLAIM3PARTY	CLAIM3PARTY_NAME	Person/Party Name
ST_COINSURANCE	COINSUR_NAME	Person name

ST_COUNTRY	COUNTRY_NAME	Person name
ST_PKGITEMREC_LOG	RCPT_WHO_USER_NAME	Person/User name
ST_POACCEPT	POACC_NAME	Person name
ST_PROJECTQUOTE	PROJECTQUOTE_STATUS_ACC_NAME	Person name
ST_PROJECTTEAMMEMBER	TEAMMEMBER_NAME	Person name
ST_SITEADMINHOST	SADMHOST_HOSTNAME	Host machine name
ST_USER	USER_NAME	Person name
VI_PRAPP_ADDRESSES	VENDORNAME	Vendor name
ST_CURRENTUSER	FQ_USER_NAME	User name
VI_PRAPP_PRQUOTES	VENDORNAME	Vendor name
VI_PRAPP_ADDRESSES	VENDORCOUNTRYNAME	Vendor country
ST_PACKAGE_TRACE	PERS_NAME	Person name
ST_FLASHALERTLOG	FAL_PERS_NAME	Person name
ST_DOCUMENT_CACTION	CORRACTION_RESPONSIBLEPERSON	Person name

ST_CUSTOMS_INV table

This table holds fields related to persons:

CSTMINV_NTFYNAME	Person name
CSTMINV_CSNEENAME	Person name

These fields are free text.

ST_MATTRANS table

This table holds fields related to persons:

MATTR_EMPL_LASTNAME	Last name
MATTR_EMPL_FIRSTNAME	First name
MATTR_DEPART_NAME	Department name

These fields are free text.

ST_MATTRANS2 table

This table holds fields related to persons:

MATTR_PERS_LASTNAME	Last name
MATTR_PERS_FIRSTNAME	First name
MATTR_DEPART_NAME	Department name

These fields are free text.

VI_MATTRANS table

This table holds fields related to persons:

MATTR_EMPL_FIRSTNAME	Person name
MATTR_EMPL_LASTNAME	Last name

These fields are free text.

Star FSM

Fsm_Object table

This table holds user and contact names. Filter on Object_Type_ID by using the code for users 10100 or Contact 10110. OBJECT_DESCRIPTION holds user name or Contact Name.

Fsm_Person table

This table holds data fields for user and contacts, and is linked to Fsm_Object table with the field PERSON_OBJECT_ID. Relevant fields are

- PERSON_TITLE
- PERSON_JOB_PHONE
- PERSON_HOME_PHONE
- PERSON_HAND_PHONE
- PERSON_EMAIL

Fsm_User table

This table has domain name for users, and is linked to Fsm_Object table with the field USER_OBJECT_ID. Domain name is found in the field USER_DOMAIN_ID.