Policy 9.3 Right to Copy or Access Information; Right to Be Forgotten

Candidates, Credential Holders (Certificants), and Learners of The Board of Certification for Emergency Nursing (BCEN®) have the consumer Right to Be Forgotten and to request and receive a hard copy of their information that is held by BCEN. The Right to Be Forgotten came to the forefront with the European General Data Protection Regulation (GDPR), and there are similar requirements and laws in other countries, such as the US states of California and Canada, to name a few. These laws can change and will be monitored by BCEN.

BCEN respects these rights and will comply with the more stringent law, which is at this time GDPR. Requests for Copy or Access of Information or Right to Be Forgotten shall be submitted to BCEN in writing, either by email or sent via USPS.

BCEN currently holds information about Candidates, Learners, and Certificants in the following applications:
- Credential Management Software - ACGI database (Association Anywhere)
- E-communication package – Informz (Higher Logic)
- Learning Management System - Docebo
- Badging System - Credly
- Game software – The Game Academy
- CRM - Zoho
- Fulfillment - MJR
- In focus – Not applicable

PROCEDURE
- Notify the BCEN Director of Operations and/or Operations Manager of the request.
- Determine the personal identifiable information (PII) for following for the person making the request (Requestor).
  - Does Requestor have an ACGI account

- Does Requestor have or was ever issued a digital badge
- Is Request, or was Requestor ever, a BCEN volunteer or board member
- Has Requestor purchased and/or been enrolled in a BCEN Learn course or third-party game, or registered for a BCEN Learn LIVE event
- Is Requestor's email address listed in Informz
- Follow the steps appropriate to the type of request.

Right for Copy or Access of Information (RFCI)

A document is created with all available Requestor information from the following areas. The completed document is stored in the Requestor's account in ACGI and sent to the Requestor via USPS.

1. ACGI database
    a. BCEN is the controller, and ACGI is the processor
    b. Bring up the Requestor's Master record
    c. Click on "Customer Data & Export" on the left-hand side under switch view an
    d. Save the report on the shared drive
2. Informz
    a. email summary will be in the Requestor's ACGI account
    b. each email can be printed from the summary list
3. BCEN Learn - Docebo
    a. Contact the LMS administrator to run and print a Personal Summary Report
4. Credly Badging System
    a. Go to Credly>administrator>Badges>earners.
    b. Search for the requester's name
    c. Print screen and save
5. Game Software – The Game Academy
    a. Contact the LMS manager or an administrator
    b. BCEN is the data owner (controller)
    c. Administrator runs the Requestor's report from the Game section
6. CRM - Zoho
    a. Contact the Employer Relationships Manager, who will reach out to Zoho to get instructions to run the necessary report
    b. The agreement is with Zoho (processor) and BCEN (controller)
7. MJR
    a. Not applicable

Right to Be Forgotten (RTBF)

An RTBF request is a request to have BCEN delete personal data pertaining to the Requestor. Once the appropriate steps are complete, the Requestor will be notified via email or a letter sent via USPS.

1. Contact the Director of Operations or Operations Manager to determine who will collect the information
2. ACGI database
   a. BCEN is the controller, and ACGI is the processor
   b. Review the Requestor's Candidate Master record
      i   Purchases and Submittals
         (1) If Requestor has never purchased anything from us nor opened a submittal, the record can be deleted
         (2) If Requestor has purchased something from us, BCEN has a responsibility to maintain financial and other records etc.
            (a) Delete Requestors' email address and phone number (use the delete box)
            (b) Change the username and password
            (c) Mark the account as DO NOT CALL
               (i) Customer Attributes>Update>click Do Not Call box
            (d) Block any application submission, recert apps, or ability to link to an organization
               (i) Customer Attribute> Update, click the above three boxes
            (e) Enter an alert note – the Requestor has asked to be forgotten and put on the do-not-call list.
3. Informz
   a. Inform a member of the marketing team to mark the Requestor's email address as unsubscribed.
      i   There is no DELETE option in Informz.
4. BCEN Learn - Docebo
   a. Notify an LMS administrator to delete the Requestor's account and ID.
      i   Even though SSO is employed, Learn maintains a copy of the ID
5. Credly Badging System
   a. If the Requestor has accepted a badge, contact Credly
      (1) Credly is the data owner because the user has accepted the Credly online agreement and can delete it on their end
   b. If the Requestor has not accepted a badge but has a Credly account, BCEN is the data owner
      i   Search for the Requestor's name in Credly's system and delete the record
6. Game Software - The Game Academy (TGA)
   a. BCEN is the owner (controller) of the data

    b. Notify the LMS director, manager, or administrator to contact TGA with specific instructions to delete the data from the Requestor's record and the high score list
        i   Request will be sent to the TGA dev team which will anonymize the data. Note: BCEN will lose visibility to that individual player performance

7. CRM-Zoho
    a. Zoho is the processor, and BCEN is the controller
    b. Notify the Employer Relationships Manager to delete the Requestor's record

8. MJR
    a. Notify the Business Operations Manager to review active fulfillment lists to verify Requestor is not on any of them

9. Intelemark
    a. Notify the Business Operations Manager to review active fulfillment lists to verify Requestor is not on any of them
    b. Notify Intelemark to delete any stored information on Requestor.