A simple(ish) guide to GDPR for MultiMe and WikiMe software users

GDPR is...

"The mutually agreed **General Data Protection Regulation** (**GDPR**) came into force on May 25, **2018**, and was designed to modernise **laws** that protect the personal information of individuals. It also boosts the rights of individuals and gives them more control over their information."

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It is no surprise that the new GDPR regulations have caused some headache and confusion that often requires us to clarify our position regarding data protection and GDPR. However, in-line with our mission to empower people through social media, MultiMe welcomes the new regulations and the transparency and control it brings to data subjects in Europe. Unlike other social networks, we are not in the business of selling your data to marketing agencies or other third parties for profit, our sole interest is in creating a useful platform and toolkit that people can directly benefit from though organising and sharing their own data. However, in order for us to provide the functionality you require from our software, we do need to collect and store your valuable, sensitive and often private data and the GDPR regulations have helped us to do this by following the best possible practice.

GDPR enforces controls between the **Data Controllers** who use and share your data, the **Data Processors** who gather and store your data and you the **Data Subject.** Please read on to see how this applies to the use of the MultiMe and WikiMe software platforms...

So Who's Who?

Data Subject

The Person
This is any registered users (such as account holders) or un-registered users (such as people browsing our marketing site) on the MultiMe or WikiMe platform. It is the person with the disabilities own account, as well as ANY other users, for example Support Workers, Teachers or family members.

The Data Subject is any user inputting data to the system, to their own account or to any other User's account, for example a Teacher uploading a picture to a Supported User's Diary about their learning activity.

The person may decide how they share or use their data themselves. For example, a person with a disability creating pages in their Wiki and sharing it with their friends. The person may have family and friends that share on behalf of the person in their best interest.

GDPR only applies to organisations that process and collect data from Data Subjects, it does not apply to activity solely between individuals.
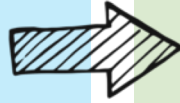
Data Controller

Service Providers
The person may require professional support to help them share or use their data. Those who work for organisations supporting the person will also need to be GDPR compliant as Data Controllers. They may make the decision to share information about that individual if seen in the person's best interest. For example, a Key Worker sharing information with a new Support Worker.
The service provider may also use the data to reflect on service user and general service performance and to report to regulators etc..
Like any other software, or data gathering activity, the use of our software by a service provider and their staff should be included in their own data protection procedures and GDPR compliance. For more information about making your organization compliant please visit the ICO website

Multi-Me Ltd.
As the software provider we have access to our user's data and have ultimate control over how it is used, therefore we are Data Controllers as well as the Data Processor and must be GDPR compliant as both. We describe how we meet this compliance in our Privacy Policy and Terms and Conditions.

Data Processor

Multi-Me Ltd.
As the company that hosts the MultiMe and WikiMe software products and processes the data, we must be GDPR compliant and are responsible for:
- Keeping up to date records of data processing activities
- Maintaining appropriate data security for our products
- Collecting data fairly and with transparency as shown in our Privacy Policy and Cookie Policy
- Getting consent from our Users for any data processing
- Getting consent from guardians of children under 16
- Appointing a data protection officer (DPO) and providing sufficient staff training
- Carrying out risk assessments on any new data processing activities
- Implementing data protection by design (default settings)
- Taking responsibility of the security and GDPR compliance of third party services that we use
- Notifying data protection agencies and effected individuals on any data breach

1. Jill owns a MultiMe account

Data Subject	Data Controller	Data Processor
Jill	MultiMe	MultiMe

2. Jill decides to share a page in her Diary with her school Teacher Mrs.Bloggs

Data Subject	Data Controller	Data Processor
Jill	MultiMe	MultiMe
	Mrs. Bloggs	

3. Mrs.Bloggs uses the picture to create a report or plan

Data Subject	Data Controller	Data Processor
Jill	MultiMe	MultiMe
Mrs. Bloggs	Mrs. Bloggs	Mrs. Bloggs

Hmmm...so lets look at some scenarios...

If you have any questions about GDPR or data protection and our software, please email them to us at:
privacy@multime.com