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The **General Data Protection Regulation** (GDPR) is applicable as a law in all EU member states and begins to apply from May 25th, 2018. This document describes the measures that is taken to include functionality in the tracing software Facad to support our customers to follow GDPR.

Since Facad is storing data in **readable text files** (XML format) in an organised folder structure including **file- and folder names that contains patient ID's and names**, Facad will change its storage structure to disable reading of personal data for unauthorised persons.

1.   Reduce the effect from data breach

The most important task for Facad regarding GDPR is to disable reading and interpretation of personal data in the event of a data breach.
Solution:

a) In Facad, version 3.10 (planned release; March-April 2018), the opportunity to automatically name files and folders when new patients are created **without the use of patient ID's and names** is introduced.

b) In Facad, version 3.11 (planned release; May-June 2018), the opportunity to **encrypt Facad data** when new patients are created is introduced.
This solution will require an extended user license for the Facad software that is not included in existing support agreements.

Ilexis AB also offers the opportunity to encrypt data and rename all files and folders in existing Facad data structure following the same principle.

1.1.   The patient list in Facad

In the event of a data breach it might be possible for unauthorised persons to see personal data in the patient list in Facad. This can be prevented by turning off the patient list completely, giving access to the patients in Facad only by linking from patient management systems. This function is already available in current version 3.9.

2.   Data cannot be saved forever

It is the responsibility of the dental clinics, based on the medical benefit, to assess how long data shall be stored. It is already possible to clean/archive patients from the data area for Facad, using manual file copying and removal.
Future improvements: Introduce a tool that helps the dental clinics to

a) delete patients from Facad's data area

b) archive patients from Facad's data area

Time plan: Introduction during the time period 2018-2019.

3.   Portability of data

Patients have the right to have access to their own data in a machine-readable format, if they want to get a second opinion from another clinic. In Facad, version 3.11, the opportunity to export **encrypted Facad data** which will be readable in other Facad installations (version 3.11 and later) is introduced. The image file formats supported by Facad already today is public enough to be deemed approved as portable formats.