

H+H Software GmbH

NetMan



Data Protection
Administration

Version 5.7

H+H Software GmbH
Maschmuehlenweg 8-10
37073 Goettingen
Phone: +49 (0)551 52208-0
Fax: +49 (0)551 52208-25
E-mail: hh@hh-software.com
Internet: www.hh-software.com

H+H vCard:



Contents

Introduction	4
Initial Startup	4
Password Protection of the Database	4
Failover by Replication	6
Protect Anonymous Logging	7
Rectification, Restriction of Processing, Erasure	9
Data Locations	9
Restrict Personal Data from Processing	11
Erasure Periods/Erasing Data	12
Create Information about Processed Data	13
Export Personal Data/Contact Data	14
Statistics: Create a View, Print	16
Appendix	21
Information about Processed Data to Data Subjects	21
Instructions: Information about Processed Data	22
Request for Information about Processed Data	23
Index	25

Introduction

This manual explains the data protection features of the software NetMan. It will help you to comply with your legal obligations regarding data protection.

Initial Startup

After installing NetMan it is important to protect your system and especially your data from unauthorized access.

- **NetMan Database:** The database is the heart of your NetMan Installation. All data are stored in the database. After installation, the database is protected by a default password. For details on how to set the password for the database, refer to the chapter "[Password Protection of the Database](#)⁴". The NetMan replication mechanism protects your system from failure. For the basics on the function of the replication mechanism, refer to the chapter "[Failover by Replication](#)⁶".
- **Anonymous logging:** NetMan anonymizes the data of users and computers in the call log by default. This simplifies your data processing to the extent that you can evaluate anonymized log data statistically without having to worry about the personal reference. The settings of the anonymization function are protected by password protection according to the two-man rule. This means that you assign two passwords to two employees and the setting can only be changed if both employees enter their passwords. For details on configuring this password protection, see "[Protect Anonymous Logging](#)⁷".

Data protection practices

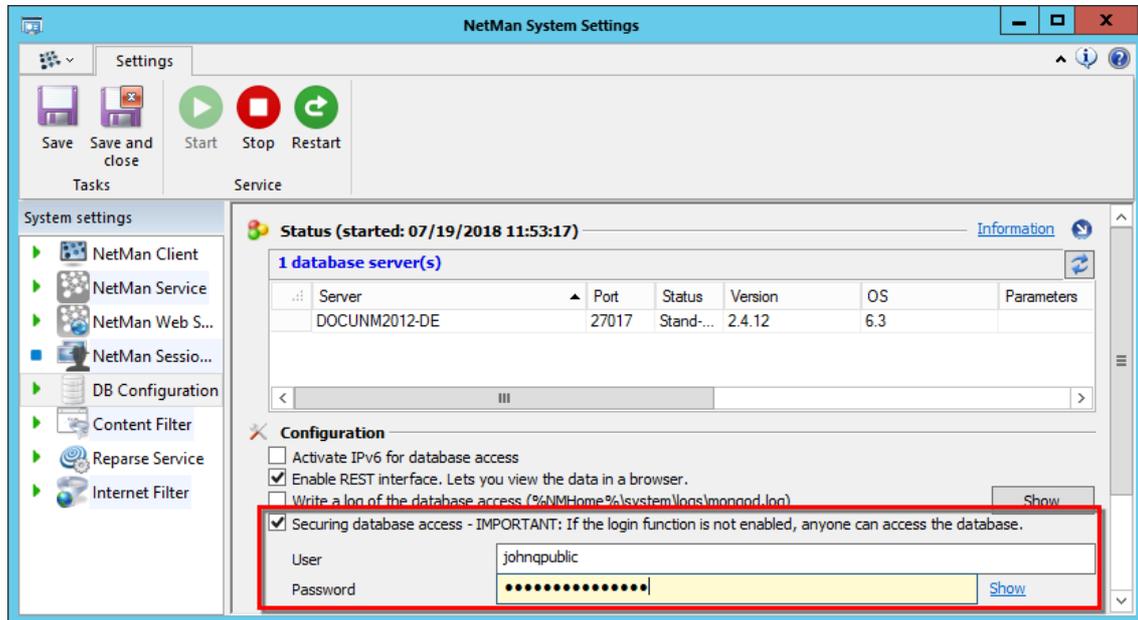
- **Rectification, Restriction of Processing, Erasure:** When processing personal data, you are obliged to keep the data up to date. This results in the obligation to correct outdated or incorrect data immediately. In addition, you are obliged to immediately erase data of persons who are no longer involved in the procedure NetMan. In the event of disputes or pending legal proceedings, it may be necessary to restrict the data from processing. How to correct, restrict or erase personal data is explained in the chapter entitled "[Rectification, Restriction of Processing, Erasure](#)⁹".
- **Create information about processed data:** According to the Data Protection Act, you are obliged to provide information on data upon request if a person affected by data processing by your institution so requests. The NetMan data processing documentation supports you by providing appropriate templates. How to create information about processed data in the software is explained in the chapter entitled "[Create Information about Processed Data](#)¹³".

Password Protection of the Database

The central database of NetMan contains all data used by NetMan. It is therefore important to protect access to the database with a strong password. After installation, the database is password-secured, but only with a default password. Therefore, you should change the password after installation. You change the database password in the NetMan System Settings program:

1. Open the Windows Control Panel.
2. In the Control Panel, select **System and Security/H+H NetMan**.

3. In the NetMan System Settings, open the DB Configuration page.
4. On the **DB configuration** page the option **Secure the database access** must be enabled:

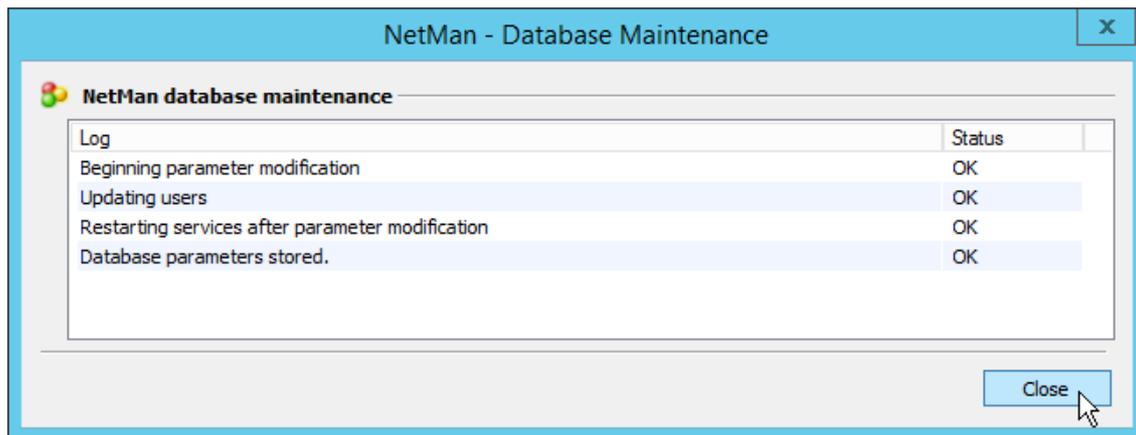


5. Next to **User** enter the user name of the authorized user and next to **Password** enter the password that secures database access.



A strong password is a password where the effort to crack it exceeds the real benefit. The BSI (Federal Office for Information Security in Germany) provides the following tips for creating strong passwords: at least eight characters long, upper and lower case letters, special characters and digits, no names of family members, pets or birthdays of these, no words from dictionaries, no number or digit sequences (123, abc), no keyboard patterns (qwerty), no simple appending of digits or special characters to words (love1). Avoid umlauts as they are not easy to enter using foreign keyboard layouts.

6. In the ribbon, click on the Save button. The changes are written to the database and the database service is automatically restarted:



7. Click on Close to close the maintenance dialog. The credentials have been changed.

Failover by Replication

This chapter explains how the NetMan replication mechanism works.



The NetMan replication mechanism provides failover for your NetMan system. The failover mechanism finally enables the availability and integrity of your data.



If you are interested in using replication in your NetMan system, the system is set up accordingly by the H + H installers. You do not need to worry about the installation. For details on installation and replication settings, see the NetMan manual ("*Security Functions/Replication*").

Basics

The replication mechanism is based on the NetMan database that supports asynchronous replication of data between database servers. Only one database server writes data, the primary database server. All database servers are combined into a replication set. A replication set consists of at least three servers: one primary and two secondary database servers. Additional secondary database servers can be added, but the total number of database servers (primary plus secondary database servers) must always be odd (i.e. 3, 5, 7, etc.). In a system with three servers, a total of one server can fail, in a system with five servers two, and so on. On the primary database server NetMan is completely installed as primary installation. On the two secondary database servers a secondary NetMan installation is performed.

Functionality

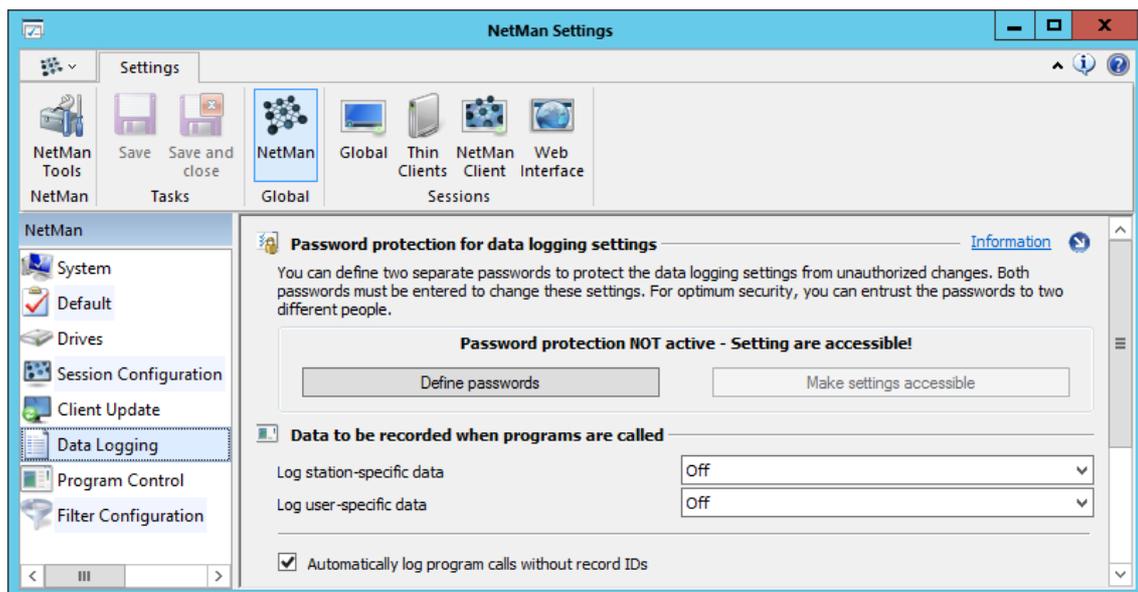
The NetMan database is used to provide the failover mechanism. The decisive factor in determining availability is the NetMan Service. If the NetMan Service on the primary database server cannot be accessed, then the database cannot be accessed either. The server is considered to be failed and the failover mechanisms take effect. The secondary servers elect a new primary database server to take over the tasks of the failed server.



Caution: The replication of NetMan data applies only to the content of the NetMan database! To implement failover as required, you must ensure that a new primary NetMan server also has access to all resources available to the failed server. The NetMan replication includes only the NetMan system components, no third-party applications. In order to implement a replication, ideally systematically separate your NetMan server and your remote desktop session hosts. A failure of the applications provided through your session hosts is not considered by the NetMan replication mechanism. You should store data required for proper functioning of NetMan scripts in the database.

Protect Anonymous Logging

The logging of program calls and related data is a core function of NetMan. Knowing who has worked with an application for how long and when and whether they had to wait for the application to start (queue) provides important information, e.g. about the utilization of your product licenses. However, logging personal data for statistical purposes is not without risk. If a data subject subsequently objects the use of his or her personal data, you would theoretically have to delete your entire statistical database, as specific data records can no longer be separated from the rest of the data afterwards. Therefore NetMan logs usage data without logging the user or computer identifier. This anonymization mechanism is configured in the NetMan settings, in the **NetMan** section, on the **Data Logging** page:



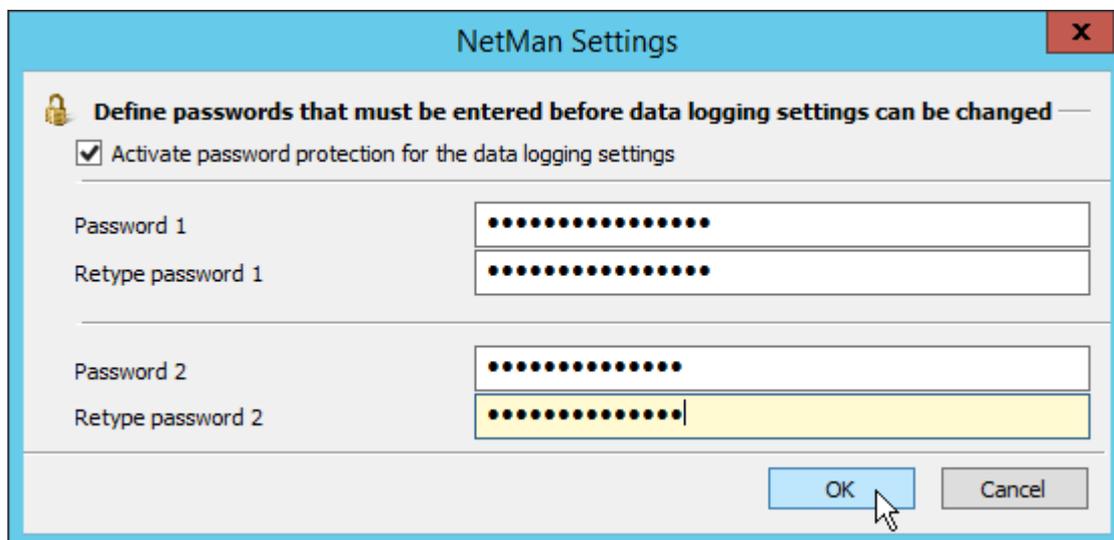
The screenshot above shows the state after installation: The logging of station and user names (**Log station-specific data** and **Log user-specific data**) is disabled. You have to protect this setting from unauthorized changes by restricting access. NetMan offers password protection according to the two-man rule. You define two passwords and assign them to two different people. This increases security enormously, because it is no longer enough to acquire one of the passwords.



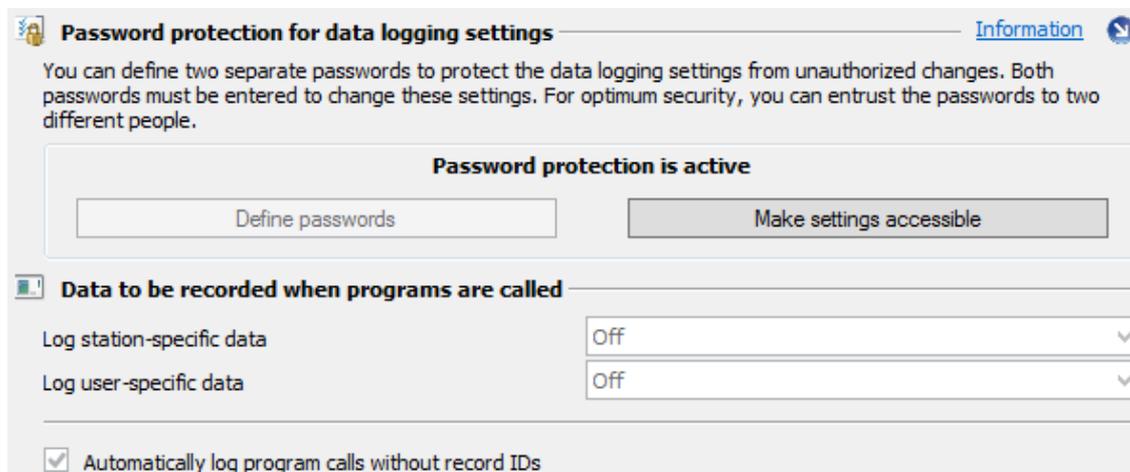
Before acceptance of the installation, the H+H installation team will address data protection measures and configure the settings according to your requirements.

Set passwords

1. Click on the Define passwords button.
2. In the **Define passwords that must be entered before data logging settings can be changed** dialog enter two passwords and confirm with OK:



3. In the ribbon click on Save. The logging settings are now locked:



To unlock and change logging settings, you must enter both passwords.

Rectification, Restriction of Processing, Erasure

This chapter describes how to rectify, restrict and erase personal data in NetMan.

Rectifying data

If you learn of an error in personal data, you are obliged to correct (rectify) this error immediately. This is best done using the NetMan programs. You need either access rights yourself or the assistance of an administrator.

For more information, see the following chapters:

- „[Data Locations](#)^[9]“ describes where in NetMan personal data may be stored.
- How to restrict personal data from processing is explained in the chapter entitled „[Restricting Personal Data from Processing](#)^[11]“.
- How to erase personal data, or when personal data in NetMan are erased automatically, is explained in the chapter entitled "[Erasure Periods/Erasing Data](#)^[12]“.

Data Locations

To rectify, restrict or erase personal data in NetMan you need to know first where to find which personal data in the software:



All data are stored in the central NetMan database. The database is password protected. Instead of direct access to the database, however, we recommend you use the NetMan programs, because they show the data in the appropriate context.

Data locations in NetMan

System:

- User files – User files are located in the user directory on the NetMan server.
- Windows user group - The Windows user group is a property of the AD user object on the domain controller.
- Windows Active Directory organizational unit (AD-OU) - The AD-OU is a property of the AD user object on the domain controller.
- Windows user profile - The Windows user profile stores all the data of the user's working environment. User profiles are created for each user on the NetMan server.
- Windows logon script - NetMan supports the use of Windows logon scripts, but does not use them on its own. A logon script is a property of the AD user object on the domain controller.

NetMan Center:

- NetMan user group
- NetMan user profile
- Time of last logon
- NetMan user settings; therein:
 - NetMan start setting
 - Language

- Startup script
- Shutdown script
- Windows Start menu
- Windows desktop
- Web Interface
- Maximum parallel sessions allowed
- Contact data; therein:
 - User name
 - Address
 - Department
 - E-mail addresses (2)
 - Phone numbers (2)
 - NetMan autostart script
 - Fully qualified domain name
 - User SID
 - Description
- Object properties (for details see section "[Special case: Object properties](#)"¹⁰¹.)

These data are defined directly in the NetMan Center and are entered by NetMan administrators. They have full access to the data. Not all these data must be set.

NetMan Log Viewer:

- Call log: Script calls with record ID, timestamp (start and stop), user, computer, record attributes
- Internet filter log: Protocol, timestamp, user, computer, application, URL, Internet filter status, content filter status
- Internet filter error log: Timestamp, User, Computer, Application
- Program Control: Program, timestamp, path, user, computer

All logs are shown in the NetMan Log Viewer. It is available through the NetMan Report Center, to which NetMan administrators have access.

Special case: Object properties

You can assign object properties to each object in NetMan . Object properties consist of an property identifier and a value. They can be edited using the **Read object properties** and **Set object properties** actions. They are freely defined, therefore personal data can theoretically also be defined here for user objects. Check your NetMan configuration concept to determine whether you use object properties to store personal information. Object properties can be found in the Properties list on the **Properties** page. Double-click on the user object to open the Properties page.

Restrict Personal Data from Processing

If there are uncertainties regarding data processing, errors have been discovered or objections have been raised, it may be necessary to restrict a user's data in order to prevent further processing. In advance: Not all of a user's data within the NetMan system can be restricted from processing. It is not possible to restrict log data from processing if they were created in the past. This would skew the statistical evaluation of the usage data in such a way that a meaningful evaluation of the use of NetMan would no longer be possible. Therefore, the restriction of a user's data in this context only has the consequence that no further protocol data on this user are collected. However, most log data, with the exception of pure usage data, are erased/overwritten in a certain time interval or can be erased manually. For details on erasing a user's log data, see "[Erasure Periods/Erasing Data](#)".

To restrict user data from processing, they are "frozen" at the latest state and the user is then removed from the NetMan system.



At least User Account Management has a deactivation function that allows you to disable users in your lists without removing them from their context. This function can be used to restrict user data from processing in User Account Management, too. A deactivated user can no longer log on to NetMan. However, we recommend that you use the export function to completely remove the data from the system.

To restrict data from processing, first the user data are exported, then the user is deleted. For details on exporting user data, see "[Exporting user data](#)". For details on deleting users, see "[Deleting users](#)". All user data are stored on an external storage medium, e.g. an USB stick, and can thus be transferred back into the system as required.

Exporting user data

You export user data from from NetMan Center.

NetMan Center

In the NetMan Center you export user objects. Click on the **NetMan Tools** shortcut to open the NetMan Center:

1. In the NetMan Center, click on the selection button **Users**.
2. In the selection sidebar, click on **Users**.
3. Select the appropriate user object.
4. In the ribbon, click on the **Export** button. The user object is exported as a CAB file. The file is stored in the `\HH\NM5\Bin\System\archiv` folder. Then delete the original user object to restrict it from further data processing in NetMan.



You must also restrict the user in your ADS to prevent the user from logging on to the system again. Any further login would create a new user object in NetMan and would generate new data.



To re-import a user object, copy the object to the `\HHH\NM5\Bin\System\library` folder. In the NetMan Center, open the program menu and select next to **Utilities** the **Script Import** entry. In the Script Import program, select the user object and click on OK to import the object.

Deleting users

In the NetMan Center, delete users by selecting the corresponding user object and clicking the button Delete.



The user object can only be deleted in NetMan Center if it is no longer referenced by other objects, e.g. groups. Before deleting, you must dissolve all references. You display the references by selecting the user object and, in the ribbon, clicking on Used by.

Erasure Periods/Erasing Data

In NetMan the data of the call log, which is indispensable for the statistical evaluation of the use of the system, are collected anonymously in order to enable a later statistical evaluation. However, the event and error logs also collect and store station and user information. Without this data, no analysis would be possible in the event of an error. User Account Management stores various data on administrative operations.

Either an automatic erasure mechanism or a manual erasure function has been implemented for this data. Please read below in which logs personal data are collected and stored and how they are erased:

NetMan Web Service: The NetMan web service has an access and an error log. It is possible that the log shows data that contain personal reference.

You can erase the log manually in the NetMan System Settings on the **NetMan Web Service** page.

Event Log: You can view the event log in the NetMan Log Viewer. In the event of an error, events related to users or stations are logged in plain text.

Event log data is automatically deleted after 70 days.

Internet filter log: You can view the Internet filter log in the NetMan Log Viewer. It shows all accesses via the Internet filter. This information is safety-relevant and therefore includes information on stations and users.

Internet filter log data is automatically deleted after 42 days.

Internet filter error log: You can view the Internet filter error log in the NetMan Log Viewer. It shows all errors of the Internet filter. This information is safety-relevant and for fault analysis, the user name and station ID must be identifiable.

Internet filter error log data is automatically deleted after 42 days.

Performance Log: You can view the performance log in the NetMan Log Viewer. The performance log analyzes performance and utilization of all stations in your network. To do this, the station ID must be logged.

Performance log data is automatically deleted after 70 days.

Program Control: You can view the program control log in the NetMan Log Viewer. Program control prevents programs from being launched bypassing NetMan. The program control log lists all cases in which the program control was triggered. The user name and station are logged. This information is safety-relevant.

Program control log data is automatically deleted after 42 days.

Create Information about Processed Data

Data subjects have a right to information on processed data: which of their personal data are collected, stored and processed in specialized procession activities. You determine internally in your institution which person(s) are authorized to create the information about processed data. To collect all data, the assistance of other employees with administrative rights is required. In the "*Instructions: Information about Processed Data*" document, contained in the data protection package, all employees involved are informed about the need for a procession data information and the procedure for creating such information. It is therefore essential that you pass on the instructions to all employees involved.

A procession data information not automatically lists all data that is stored and processed for a specific person. In the request for information about processed data, the data subject must specify the data he wishes to inspect. The form "*Request for Information about Processed Data*" therefore offers options for selecting which data is requested. No information need be provided on personal data used for data backup or data protection control. This includes system logs that ensure the correct operation of the NetMan processing activity and thus serve the integrity of collected data, for example. Basically, for NetMan, information about the following two data types is provided:

- **Personal data/contact data:** You can find this type of data in the NetMan Center, assigned to the corresponding user object.
- **Log data/usage data from NetMan:** You can access this data via the NetMan Statistics by creating a corresponding view. This type of log data is not used for the security of the system, but only for usage statistics and is therefore subject to data procession requests. An exception is when the usage data is collected anonymously using the NetMan anonymization function. In this case there is no personal reference in these data and you do not have to include them in a procession data information.



Read about the storage locations of all personal data in the chapter "[Data Locations](#)⁹".

A written request from the data subject is a prerequisite for the provision of a procession data information. The request specifies the type of data on which information is requested.

To provide the information on processed data use the form "Information about Processed Data to Data Subjects", which you find in the appendix.

The following chapters explain the procedure of creating a procession data information:

"[Export Personal Data/Contact Data](#)¹⁴" describes how you export personal data and contact details from from NetMan Center..

"[Statistics: Create a View, Print](#)¹⁶" shows how to create and print a user-specific data view if you log usage data in plain text.

Export Personal Data/Contact Data

This chapter explains how you obtain personal data and contact data from from NetMan Center.

NetMan Center

1. To open the NetMan Center, click on the NetMan Tools shortcut:



You need administrative rights to open the NetMan Center and view user objects. Have an administrator assist you.

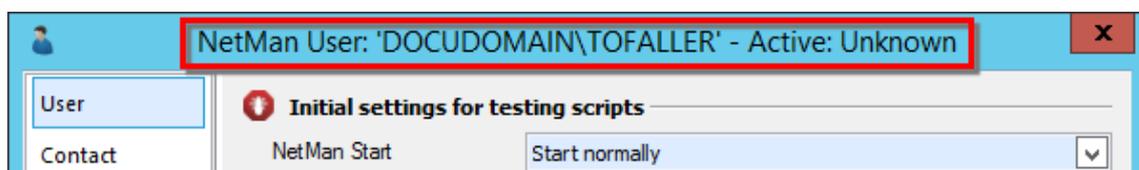


2. In the NetMan Center you open the properties of the corresponding user object: Click on the User selection button:



3. Double-click the corresponding user object.

4. In the **Properties** dialog the NetMan user name and the time of the last login are shown in the header line:



If next to **Active** only **Unknown** is shown, the user has never logged on to NetMan.

5. Switch to the **Contact** page. There you can see all contact data entered for the user:



All values on this page must be added manually. These values are entered optionally and in accordance with your NetMan concept. It is therefore quite possible that no data is entered here for any user.

The screenshot shows a dialog box titled "NetMan User: 'DOCUDOMAIN\TOFALLER' - Active: Unknown - Changed". On the left is a sidebar with tabs: "User", "Contact" (selected), "Member of", "Autostart", "Properties", and "Description". The main area contains the following fields:

- User name:** Name: Tobias Faller
- User address:** Address: ACME Av. 101, ACMEtown
- Department:** Department: Development
- E-mail addresses:** E-mail 1: tfaller@acme.com; E-mail 2: <Enter an e-mail address>
- Phone numbers:** Phone 1: <Enter a phone number>; Phone 2: <Enter a phone number>

At the bottom right are "OK" and "Cancel" buttons.

6. Switch to the **Properties** page. Check whether object properties are entered here and whether they contain personal data. Add personal data to the information about processed data.

7. Switch to the **Description** page. If a description is entered here, transfer it to the information about processed data.

Statistics: Create a View, Print

If you do not anonymously log NetMan usage data, you have to inform about the usage data of the data subject. To export only the data of the specific data subject, create a calculation for this specific user using NetMan Statistics and print it using the Statistics print function. The printout is added to the information about processed data as appendix.



You check the anonymization setting in the NetMan Settings program, in the NetMan section, on the **Data Logging** page: How to anonymously log data is explained in the chapter entitled „[Protect Anonymous Logging](#)“⁷⁴ and in the NetMan documentation.

This chapter describes how to create a user-specific calculation and print this calculation.

Creating user-specific calculations

You create a user-specific calculation with NetMan Statistics:



To work with NetMan Statistics, you need appropriate access to the program. If you lack access privileges, have an administrator assist you.

1. You start the NetMan Statistics program via the NetMan Report Center. To open the Report Center, double-click the desktop shortcut **NetMan Tools** and select **NetMan Report Center**:



2. Log on to the Report Center:

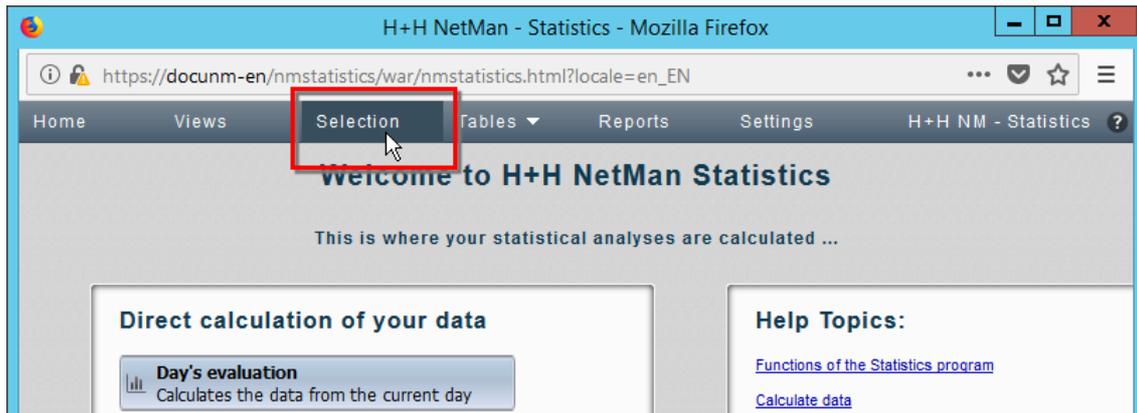
Login

User name

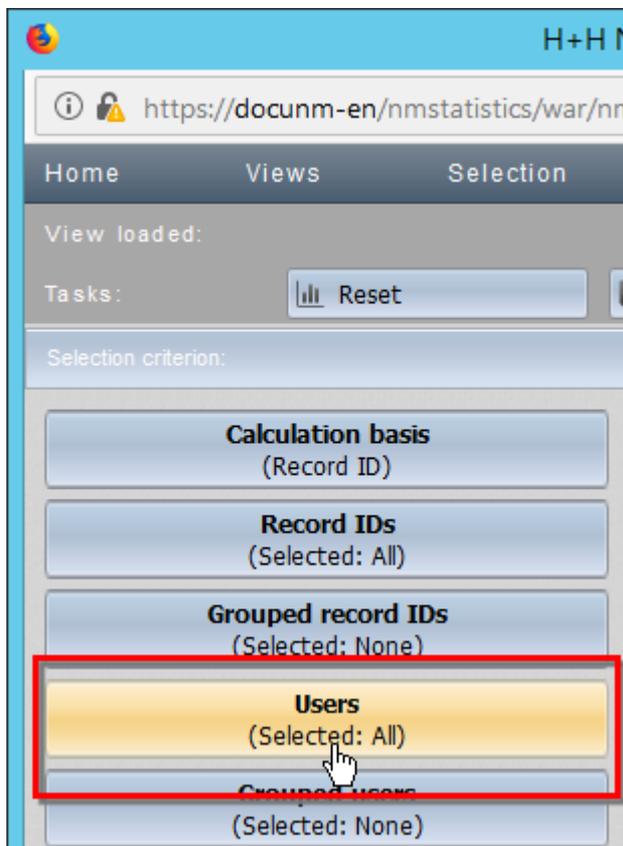
Password

Login to:

3. In the Report Center, open the Statistics by clicking the **Statistics** link.
4. In the main window of the Statistics program, in the menu bar, click on Selection:



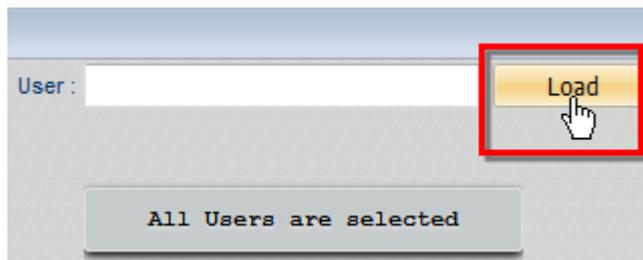
5. To calculate the data for a specific user, click on the selection button User:



6. All users are currently loaded in the calculation. To view the users, click the Load button:



If you have a large number of users, you can use the input field above the list to filter the list. For example, enter `MyDomain\B*` to display all users in the "MyDomain" domain that begin with the letter "B".

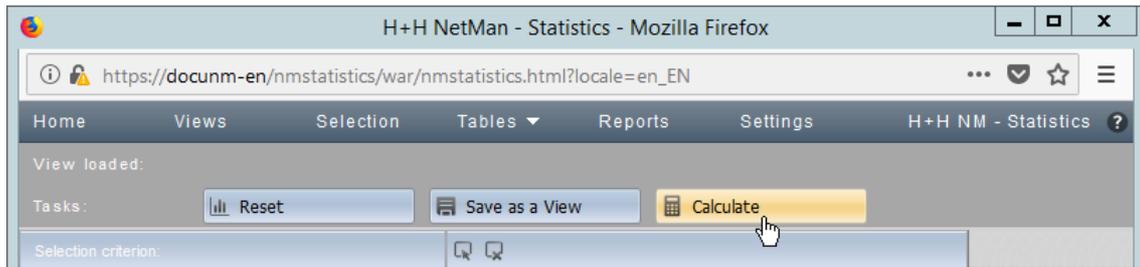


7. Select the appropriate user from the list.

8. In the selection sidebar, click the Period button and select the period for which data is requested:

Selection criterion:	
Calculation basis (Record ID)	Period
Record IDs (Selected: All)	March 2018
Grouped record IDs (Selected: None)	April 2018
Users (Selected: All)	May 2018
Grouped users (Selected: None)	June 2018
Stations (Selected: All)	July 2018
Grouped stations (Selected: None)	August 2018
Attributes (Selected: All)	
Periodicity (Months)	
Period (March 2018 - August 2018)	

9. In the task bar, click on the Calculate button.

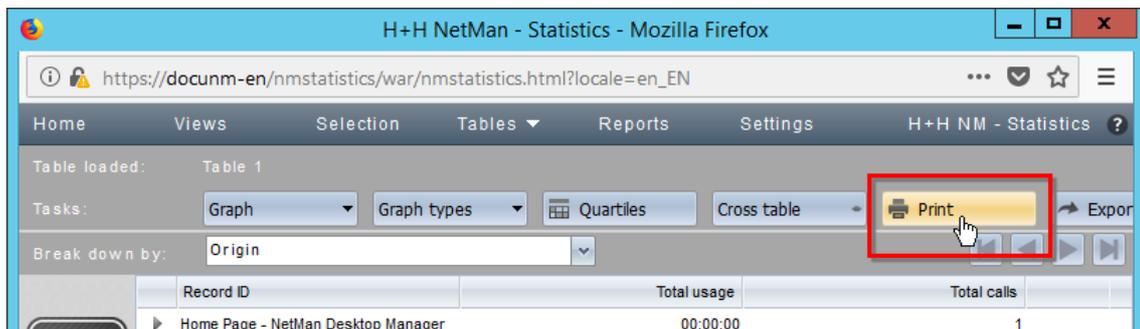


10. As table format, select Main table. The table is calculated and displayed.

Print calculation

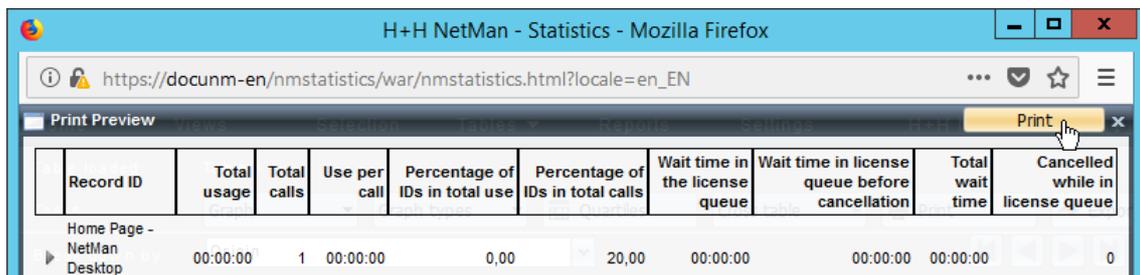
To append the calculated data to the information about processed data, print it using NetMan Statistics:

1. In the task bar, click on Print.



This opens the print preview.

2. In the print preview, click on the Print button.



3. In the print dialog select an available printer and print the document.

4. Add the printout as Appendix 1 to the information about processed data.

Appendix

The appendix contains various examples of documents for your data protection documentation:

- Information about Processed Data to Data Subjects
- Instructions: Information about Processed Data
- Request for Information about Processed Data

Information about Processed Data to Data Subjects

First name: [First name]

Surname: [Surname]

Legal basis of data processing

According to Regulation (EU) 2016/679 of the European Parliament and of the Council, Art. 6, for the procession activity NetMan written declarations of consent of the persons affected by the data processing are obtained and documented.

Data processing is permitted, as the data subject has given his written consent.

Consent was given on: [Date]

Purpose of data collection and processing

Personal data and contact data are stored in NetMan in order to provide the users with personal access to the software and a personalized working environment. Contact data such as address and e-mail address are used to contact the data subjects.

Log data are used to log the use of NetMan as well as logon and system processes.

Information about personal, in the processing activity NetMan collected, stored and processed data

Personal data/contact data:

Category	Data	Origin of data
Name		User Account Management
First name		User Account Management
Date of birth		User Account Management
Class		User Account Management
Windows display name		User Account Management
Windows user name		User Account Management
User image		Classroom Control Center
Time of last logon		NetMan Center (management program)
NetMan user name		NetMan Center (management program)
Address		NetMan Center (management program)

E-mail addresses		NetMan Center (management program)
Phone numbers		NetMan Center (management program)
Description		NetMan Center (management program)

Log data:

The log data requiring information provision include the usage data of NetMan for Schools or the applications provided via NetMan for Schools.

The usage data are collected anonymously:

- Yes, no personal data are collected and processed. There is no obligation to provide information.
- No, personal data are collected and processed. The usage data of the current logging period (1000 entries) can be found in appendix 1.

City, Date

[Signature]

Instructions: Information about Processed Data

This service instruction provides binding information on the organizational process flow creating information about processed data for data subjects from the NetMan data procession activity.

Legal basis

According to Regulation (EU) 2016/679 of the European Parliament and of the Council, Art. 15, data subjects have the right to access the personal data stored about them in a data report.

The data processor is obliged to provide information on the data.

Scope of application

This instruction applies to all employees who are directly or indirectly working on the data protection of the processing activity NetMan. This concerns the data protection officer, system and NetMan administrators and administrative staff.

Procedure

Information about processed data must be requested and provided in writing. In order to request information about processed data, the data subject completes the form 'Request for Information about Processed Data,' which is available at the Secretariat. After submitting the form, the information about processed data is generated, sealed in an envelope and can be collected by the data subject or sent by post.

Competences

The data protection officer is responsible for providing information about processed data to data subjects:

Data protection officer: [Surname],[First Name],[Contact]

To obtain the data required for the information about processed data, the data protection officer requires the cooperation of the following persons:

System administrator: [Surname],[First Name],[Contact]

NetMan administrator: [Surname],[First Name],[Contact]

The Secretariat's administrative staff will provide and receive the form 'Information about Processed Data.'

Date, [School management/procession controller]

Request for Information about Processed Data

First name of the applicant:

Surname of the applicant:

Information about personal, in the processing activity NetMan collected, stored and processed data.

I hereby request information about my personal data that have been collected, stored and processed with the processing activity NetMan. I request information about the following data:

Personal data/contact details

Usage data for NetMan (if not collected anonymously)

City, Date

Signature

Index

A

anonymization 7
anonymize logging 7
Appendix 21
availability 6

D

data 9
data information 22
data locations 9
data protection manual 4
data rectification, restriction of processing, erasure 9
delete logs 12

E

Erase data 12
erasing 9
erasing data 11
erasure periods 12
export contact data 14
export personal data 14

F

failover 6

I

information about processed data 21, 23
 contact data 14
 create 13
 personal data 14
initial startup 4
instructions 22
integrity 6

P

password protection 7
password protection of the database 4
personal data 9
preface 4
Protect database 4

R

- rectifying* 9
- replication* 6
- request for information about processed data* 23
- restricting data from processing* 11
- restricting processing* 9

S

- Statistics* 16

T

- two-men rule* 7

V

- views*
 - create* 16
 - print* 16