
Welcoming the GDPR

Como has been busy preparing for the GDPR—new EU regulations designed to provide EU citizens with more control over their personal data. Some rules are new, while some are not (except that the GDPR puts extra emphasis on them). All rules will be enforced starting on May 25, 2018.

Right to Be Forgotten

Members should be able to easily request to have their personal data erased (which will also result in their removal from the loyalty programme). So what did we do?

- New app screen will be added to all apps—that allows members to easily submit this request
- Automatic email notification to the business of the request
- Ability to delete all personal data from the Como operational database with one click in the Hub
- Clear guidelines on what business should do with their benefits, and data stored outside Como

Right to Know Your Data & Data Portability

Members should be able to easily access and transfer their personal data. So what did we do?

- New app screen will be added to all apps—that allows members to easily request their data
- Automatic email to the member with reports on personal info, actions and purchase history

Member Consent

Members should be able to easily give (and withdraw) clear consent to process their personal data. So what did we do?

- For non-app registration, customer also automatically gets a link by SMS/email to give consent
- New members who didn't consent (within a grace period) cannot earn and use benefits
- Dedicated SMS reminder to encourage members to provide consent
- New app screen will be added to all apps so members can withdraw consent (personal info is deleted)

Privacy by Design

Como protects the privacy of members by guiding businesses as to which type of information is permissible to collect, and limiting the info shared with third parties. Enhancements were also made so businesses can prevent minors from registering (according to the legal minimum age per territory).

Data Security

Member data is stored on cloud services (such as Amazon and Google) and protected using the highest level of security measures. Data transferred to Amazon or Google's US servers is covered by Privacy Shield terms. Como also secures all the data that is shared with third parties, and controls access to data available from the Como Hub.

[Read more about our data collection practices](#)

Accepting the Programme Terms

As we prepare for the GDPR, we're ensuring compliance with the requirements related to member acceptance of programme terms. So we've created new processes to help businesses get the legally required consent from all their members—no matter how they register.

Who does this effect?

Members automatically accept terms and conditions when they register through the app registration form (even if it's presented in your website). The new processes apply to members that register in other ways (such as by quick registration at the EPOS) since they don't provide explicit consent.

What are the changes?

Registration

For non-app registration, members will automatically receive a link by SMS or email* that lets them quickly complete their registration through a website, or after downloading the app. This requires members not only to consent but to give you all the valuable member details you need to enrich your customer data and personalize your campaigns.

App Login

The app login flow was enhanced to support the new processes. Existing members can login more quickly using the new login screen. New members who didn't consent are directed to the update form when they login, and cannot access any members-only tiles until they consent to the terms.

Members Without Consent

New members have 24 hours to complete their registration, and will get to enjoy all their member benefits during this time. After 24 hours, any member that didn't consent won't be able to participate in the loyalty programme—including earning or using programme benefits. When they try to identify at the EPOS, the cashier will be displayed their consent status and we'll also remind them to consent to programme terms by SMS or email.

Marketing SMS or Email

Members who didn't consent to programme terms will not be able to receive marketing SMS or email. However, businesses can still choose whether or not to provide members with the option to explicitly allow SMS or email from the registration form.

What about existing members?

As for members that already registered in the past without providing explicit consent, this won't really affect them. However, you'll still be able to decide if you want to reach out to them using our automated SMS or email to encourage consent—such as when they identify at the EPOS.

**SMS and email are paid add-on services, which may have an additional cost*