

Guidance for Cloudpath Compliance With General Data Protection Regulation (GDPR)

Supporting Cloudpath 5.2

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Preface

Document Conventions

The following tables list the text and notice conventions that are used throughout this guide.

TABLE 1 Text conventions

Convention	Description	Example
monospace	Identifies command syntax examples.	<code>device(config)# interface ethernet 1/1/6</code>
bold	User interface (UI) components such as screen or page names, keyboard keys, software buttons, and field names	On the Start menu, click All Programs .
<i>italics</i>	Publication titles	Refer to the <i>Ruckus Small Cell Release Notes</i> for more information

Notes, Cautions, and Warnings

Notes, cautions, and warning statements may be used in this document. They are listed in the order of increasing severity of potential hazards.

NOTE

A NOTE provides a tip, guidance, or advice, emphasizes important information, or provides a reference to related information.



CAUTION

A CAUTION statement alerts you to situations that can be potentially hazardous to you or cause damage to hardware, firmware, software, or data.



DANGER

A DANGER statement indicates conditions or situations that can be potentially lethal or extremely hazardous to you. Safety labels are also attached directly to products to warn of these conditions or situations.

Command Syntax Conventions

Bold and italic text identify command syntax components. Delimiters and operators define groupings of parameters and their logical relationships.

Convention	Description
bold text	Identifies command names, keywords, and command options.
<i>italic text</i>	Identifies a variable.
[]	Syntax components displayed within square brackets are optional.
{ }	Default responses to system prompts are enclosed in square brackets.
{ x y z }	A choice of required parameters is enclosed in curly brackets separated by vertical bars. You must select one of the options.
x y	A vertical bar separates mutually exclusive elements.
< >	Nonprinting characters, for example, passwords, are enclosed in angle brackets.
...	Repeat the previous element, for example, <i>member[member...]</i> .

Convention	Description
\	Indicates a “soft” line break in command examples. If a backslash separates two lines of a command input, enter the entire command at the prompt without the backslash.

Document Feedback

Ruckus is interested in improving its documentation and welcomes your comments and suggestions.

You can email your comments to Ruckus at: docs@ruckuswireless.com

When contacting us, please include the following information:

- Document title and release number
- Document part number (on the cover page)
- Page number (if appropriate)
- For example:
 - Ruckus Small Cell Alarms Guide SC Release 1.3
 - Part number: 800-71306-001
 - Page 88

Ruckus Product Documentation Resources

Visit the Ruckus website to locate related documentation for your product and additional Ruckus resources.

Release Notes and other user documentation are available at <https://support.ruckuswireless.com/documents>. You can locate documentation by product or perform a text search. Access to Release Notes requires an active support contract and Ruckus Support Portal user account. Other technical documentation content is available without logging into the Ruckus Support Portal.

White papers, data sheets, and other product documentation are available at <https://www.ruckuswireless.com>.

Online Training Resources

To access a variety of online Ruckus training modules, including free introductory courses to wireless networking essentials, site surveys, and Ruckus products, visit the Ruckus Training Portal at <https://training.ruckuswireless.com>.

Contacting Ruckus Customer Services and Support

The Customer Services and Support (CSS) organization is available to provide assistance to customers with active warranties on their Ruckus Networks products, and customers and partners with active support contracts.

For product support information and details on contacting the Support Team, go directly to the Support Portal using <https://support.ruckuswireless.com>, or go to <https://www.ruckuswireless.com> and select **Support**.

What Support Do I Need?

Technical issues are usually described in terms of priority (or severity). To determine if you need to call and open a case or access the self-service resources use the following criteria:

- Priority 1 (P1)—Critical. Network or service is down and business is impacted. No known workaround. Go to the **Open a Case** section.

- Priority 2 (P2)—High. Network or service is impacted, but not down. Business impact may be high. Workaround may be available. Go to the **Open a Case** section.
- Priority 3 (P3)—Medium. Network or service is moderately impacted, but most business remains functional. Go to the **Self-Service Resources** section.
- Priority 4 (P4)—Low. Request for information, product documentation, or product enhancements. Go to the **Self-Service Resources** section.

Open a Case

When your entire network is down (P1), or severely impacted (P2), call the appropriate telephone number listed below to get help:

- Continental United States: 1-855-782-5871
- Canada: 1-855-782-5871
- Europe, Middle East, Africa, and Asia Pacific, toll-free numbers are available at <https://support.ruckuswireless.com/contact-us> and Live Chat is also available.

Self-Service Resources

The Support Portal at <https://support.ruckuswireless.com/contact-us> offers a number of tools to help you to research and resolve problems with your Ruckus products, including:

- [Technical Documentation](https://support.ruckuswireless.com/documents)—<https://support.ruckuswireless.com/documents>
- [Community Forums](https://forums.ruckuswireless.com/ruckuswireless/categories)—<https://forums.ruckuswireless.com/ruckuswireless/categories>
- [Knowledge Base Articles](https://support.ruckuswireless.com/answers)—<https://support.ruckuswireless.com/answers>
- [Software Downloads and Release Notes](https://support.ruckuswireless.com/software)—<https://support.ruckuswireless.com/software>
- [Security Bulletins](https://support.ruckuswireless.com/security)—<https://support.ruckuswireless.com/security>

Using these resources will help you to resolve some issues, and will provide TAC with additional data from your troubleshooting analysis if you still require assistance through a support case or RMA. If you still require help, open and manage your case at https://support.ruckuswireless.com/case_management

Overview of GDPR Compliance

The European Union (EU) General Data Protection Regulation (GDPR) requires companies to protect the privacy of their EU customers by keeping their personally identifiable information (PII) safe.

This document is intended for Cloudpath ES system administrators as a guideline for making your Cloudpath system compliant with GDPR.

The major elements of being GDPR compliant are:

- Informing end users of all the data that Cloudpath uses for authentication that could personally identify them. Examples of such data include:
 - Username
 - Email addresses
 - IP address
 - MAC address
 - Login IDs

- Informing end users of what is done with this data and with whom it is shared.
- Providing end users with a mechanism to request that their personal information be removed if they decide to opt out of using Cloudpath.

NOTE

For information about how where this type of information should be provided to end users during the Cloudpath enrollment process, refer to [Configuring Acceptance Use Policy](#) on page 7.

Configuring Acceptance Use Policy

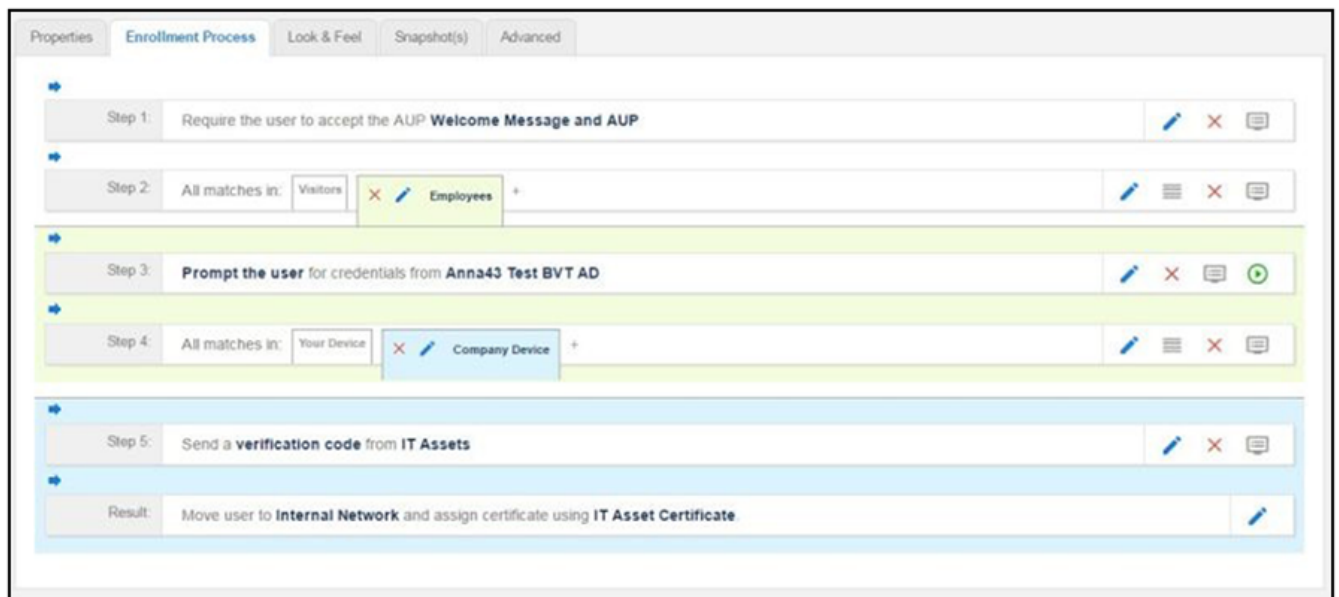
The Acceptance Use Policy page of any workflow configuration is where you should call out GDPR compliancy information for your end users.

The Acceptance Use Policy (AUP) page provides the terms and conditions for Cloudpath users when they go through the onboarding process.

Follow these steps to edit the AUP page to add the necessary GDPR-related information:

1. Follow the instructions in the *Cloudpath Deployment Guide* for either creating a workflow (navigate to **Configuration > Workflows** in Cloudpath) from a blank state or modifying an existing workflow for the purpose of editing the AUP page. The AUP page is typically the first step in a workflow, as shown in the completed example workflow below.

FIGURE 1 AUP Step in a Cloudpath Workflow



2. If you are creating a new workflow, you are prompted early in the enrollment step-selection process to create an AUP step. If you are editing an AUP step in an existing workflow, such as the example above, click the edit icon to open the AUP page. The screen below shows an AUP page before any configuration has been performed.

FIGURE 2 AUP Page Where You Customize the Message Box

Configuration > Workflows > Insert Step

Cancel Back Save

Create Acceptable Use Policy

Display Name: New Acceptable Use Policy

Description:

Webpage Display Information:

Page Source: Standard Template

Title: Welcome to the \${ACCOUNT_NAME} Network

Message: Access to the \${ACCOUNT_NAME} network is restricted to authorized users and requires acceptance of the Terms & Conditions below

Once authorized for access, your device will be configured with a unique certificate for network access

Bottom Label:

Checkbox Default State:

Acceptance Checkbox Label: I agree to the

Checkbox Highlight Color: FCFFB3 Reset Default

Continue Button Label: Start >

Policy File: Choose File No file chosen

3. Complete the information in this screen (see the figure below for an example), and be sure to edit the **Message** box to include the following information:
 - A list of all personally identifiable information (PII) data that the operator is collecting via Cloudpath and what it is being used for. Some examples of sections that you may want to include in the Message box could be titled as:
 - "Data Privacy Statement"
 - "What Information Do We Capture and for What Purposes?" (A portion of this section is shown in the example screen below).
 - "Use of Cookies"
 - A method for how the user can request that all personal data be purged if the user decides to stop using Cloudpath. The method of how this data can be purged is up to you as the Cloudpath system administrator to determine. For

example, it could be a link that the user needs to click to then send some type of identifier (such as a MAC address) so that you can locate the user on the Enrollments page in the Cloudpath system.

FIGURE 3 Example of GDPR-Compliant AUP Page

Configuration > Workflows > Insert Step Cancel Back Save

Create Acceptable Use Policy

Display Name: GDPR Use Policy

Description: This is the AUP used to be GDPR compliant.

Webpage Display Information:

Page Source: Standard Template

Title: Welcome to ABC Networks

Message:
 Access to the ABC Networks is restricted to authorized users and requires acceptance of the Terms & Conditions below. Once authorized for access, your device will be configured with a unique certificate for network access.
 What Information Do We Capture and For What Purposes?
 When you access a web page of ABC Networks, data are captured about this event, including IP address that your Internet Provider has assigned to you, websites from

Bottom Label:

Checkbox Default State:

Acceptance Checkbox Label: I agree to the `<a id='eulaFile' target='_cpn' href='${AUP_FILE}`

Checkbox Highlight Color: FCFFB3 [Reset](#) [Default](#)

Continue Button Label: Start >

Policy File: Choose File No file chosen

4. Perform the remaining steps for the workflow that are listed in the Deployment Guide, such as publishing and testing the Message box of the AUP step in the workflow.

Purging User Information

As part of GDPR compliance, you must purge data about a user who chooses to opt out of Cloudpath and requests that all personal information be removed.

As described in the [Configuring Acceptance Use Policy](#) on page 7 section, you need to include instructions to users who wish to have their personal information purged should they decide to stop being a Cloudpath user. One of the pieces of information they must provide is a way for you to locate their record in the **Dashboard > Enrollments** screen in Cloudpath. An example of this screen is shown below.

FIGURE 4 Completed Enrollments Screen

Assistance ID	Enrollment Status	Name	Timestamp	Selections	Operating System	MAC Address	Device Name	Location	Common Name	Expiration Date	Serial Number	Thumbprint	Last OSCP Date	Voucher List	Auth Type	
706C	Certificate Issued	bob	03/15/2016 17:00 MDT	Employees - Your Device	Windows 8	88:76:3F:11:48:4E	Hewlett-Packard HP Pavilion 15 Notebook PC		bob@anna43.company.com	03/15/2017	4884...F933	2790...4A80	03/15/2016 17:01 MDT		Active Directory	
4580	Completed		03/15/2016 15:55 MDT	B	Windows Phone 8		Microsoft Corporation Windows Phone 8									
878A	Completed		03/15/2016 15:20 MDT	B	Chrome OS		Google Inc. Chrome OS									
F76E	Completed		03/15/2016 15:19 MDT	B	Chrome OS		Google Inc. Chrome OS									
D607	Certificate Issued	bob	03/15/2016 14:43 MDT	Employees - Your Device	Windows 10	88:3F:5D:09:99:26	CHRS-WDR9-PC		bob@anna43.company.com	03/15/2017	4832...762A	0842...AD12	03/15/2016 14:45 MDT		Active Directory	
457E	Completed		03/15/2016 14:29 MDT	A	Ubuntu	00:22:FA:7D:EA:D8	Canonical Ltd. Ubuntu VMWare, Inc. VMware Virtual Platform									
1A7D	Completed		03/15/2016 14:27 MDT	A	Fedora											
B414	Completed		03/15/2016 14:25 MDT	B	Ubuntu	9C:D2:1E:A9:81:59	Hewlett-Packard HP 15 TouchSmart Notebook PC									
4A20	Completed	bob	03/15/2016 14:17 MDT	B	Android 4.1 Tablet	39:D6:C9:09:A3:8C	samsung SM-T210R									
4211	Completed	bob	03/15/2016 14:15 MDT	B	Android 4.2	A0:0B:8A:8B:95:21	samsung Galaxy Nexus									
F1EE	Completed	bob	03/15/2016 14:13 MDT	A	Android 6.0	02:00:00:00:00:00	LG E Nexus 5									
A759	Completed	bob	03/15/2016 14:11 MDT	A	Android 4.4	CC:3A:61:40:6E:52	samsung SCH-I545									
B44F	Completed	bob	03/15/2016 14:09 MDT	A	Android 6.0	02:00:00:00:00:00	Huawei Nexus 6P									
A648	Certificate Issued	bob	03/15/2016 11:51 MDT	Employees - Your Device	Windows 10	84:3A:4E:13:63:82	Microsoft Corporation Windows 10		bob@anna43.company.com	03/15/2017	3953...71C5	FFAE...E072	03/14/2016 06:51 MDT		Active Directory	
E844	Certificate Issued	bob	03/15/2016 11:25 MDT	Employees - Your Device	Windows 10	90:4C:E5:9D:BD:01	Hewlett-Packard HP Pavilion 14 Notebook PC		bob@anna43.company.com	03/15/2017	3F7A...E988	54FA...5CC3	03/15/2016 11:36 MDT		Active Directory	

Follow these steps to delete a record:

1. Locate the record to delete. You can use the search fields above the column you are using to locate the user information, such as the MAC address column.
2. Click the magnifying glass icon to the left of the desired record. This opens up the record in View mode.
3. Scroll to the bottom of the record, then click on **Cleanup**.
4. Click the box called **Delete Enrollment & Related Data**, then follow the popup instructions to complete the deletion process.

NOTE

If deletion is successful, you are returned to the list of records, and an "Enrollment destroyed" message appears at the top of the screen.

Additional Information

If a customer has requested that their information be purged, remember to not only remove it from Cloudpath, but be sure to also remove it from any other systems, such as external log servers, where it may have been propagated.



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