

NCR SILVER

Privacy

Implementation

Guide

NCR Silver
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Software Version

This Doc Type is compatible with NCR Silver.

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1 Disclaimer

THIS DOCUMENT IS DESIGNED TO HIGHLIGHT SOME OF THE PRIVACY, PRIVACY BY DESIGN, AND PRIVACY BY DEFAULT CONSIDERATIONS RELATING TO NCR Silver AND IS INTENDED ONLY AS AN INTRODUCTION TO PRIVACY AND THE PRODUCT.

THIS DOCUMENT SHOULD NOT BE CONSTRUED AS LEGAL ADVICE OR ANYTHING OTHER THAN A GENERAL INTRODUCTION. FOR IMPLEMENTATION SUPPORT FOR PRIVACY NEEDS SPECIFIC TO YOUR BUSINESS, PLEASE CONTACT NCR PROFESSIONAL SERVICES.

2 Background

2.1 Purpose

This document is designed to give the user a practical overview of how Privacy has been implemented in this product.

2.2 Overview

This document describes the configuration options that must be used to install NCR Silver to ensure privacy requirements are met.

This document also describes aspects of the product's function and operation to allow the customer to

- define their privacy statement
- understand the consents that are available
- access and honor end-user requests
- retain and erase data

2.3 Privacy and security

Privacy and security are both incorporated in the NCR software development lifecycles and methodologies, and can be seen as mutually supportive. Accordingly, to achieve full benefit of the privacy features of NCR Silver, it must be installed in a secure environment.

2.4 Definitions

Name	Meaning	Responsibilities
Consumer	See Data subject.	
Customer	An NCR customer.	
Data controller	The NCR customer who uses this product as part of their system. Extraordinarily, NCR may also be a controller (eg where NCR provides a service where the customer is the end user).	Owns the relationship with the data subject. Defines the privacy statement under which the data subject contracts to do business. Owns the relationship with the data processor.
Data processor	The NCR customer who runs this product as part of their system, OR NCR as host of the product on behalf of the NCR Customer.	Is responsible to the data controller for the implementation of privacy.
Data subject	The end user of the product.	Uses the product directly or indirectly. Has recourse to data privacy rights. "the man on the street"
Software provider	NCR Software Engineering.	Provides the product to the Data Processor to meet the defined privacy requirements.

2.5 Contacts

Provide a list of contact points for Privacy :

- Customer support: customercare@ncrsilver.com
- NCR Privacy team: CTOData.PrivacyGuild@ncr.com
- NCR Legal: Office.Privacy@ncr.com

3 Product function

3.1 Core functionality

NCR Silver is a comprehensive platform for small businesses in retail and hospitality sectors. NCR Silver consists of the following elements: Essentials POS, Pro Restaurant POS app, web-based Back Office, Console, and eCommerce solution.

The following functions of NCR Silver use personal data:

- Tickets – consumers' emails or phone numbers can be used to deliver digital receipts. If a consumer is assigned to a ticket, their personal information will be stored with it
- Users – personal data is used to identify employees and determine their level of access
- Customers – consumers' personal information can be stored in the Silver Back Office and captured through the POS system

3.2 Optional functionality

NCR Silver provides a number of optional functions that can be enabled or disabled by the customer. The list of such options includes:

- Promotions – if the customer has a loyalty program configured, consumers' personal information is required to identify a consumer and assign loyalty points and rewards to them
- Email marketing – NCR Silver gives the customers option to store information about their consumers to communicate welcome and promotional messages to the consumers through their emails
- Open loyalty – NCR Silver supports integrations with 3rd party loyalty providers which require consumers' personal data for identification purposes
- Online ordering – NCR Silver supports integrations with 3rd party online ordering providers that require consumers' personal information, such as their name and address, in order to complete the delivery

For more information about which Personal data may be specifically stored and used please see sections 4 and 5 of this document.

3.3 Automated decisions

NCR Silver loyalty option automatically assigns rewards to consumers based on their

accumulated loyalty points and prompts the cashier to apply these rewards at the checkout. NCR Silver also automatically sends out Miss You and Welcome emails to consumers who chose to subscribe to email marketing. Welcome email is sent a consumer when they first sign up for email marketing, and the Miss You email is sent to consumers who have not made a purchase in the last 30-365 days (the time period and the email contents are determined by the customer).

3.4 Profiling

NCR Silver does not do any automatic profiling. However, it gives the user an option to create categories and attributes that they can assign to the consumers. It is up to the customer to decide how they would like to use these features, but they can be potentially used for profiling.

4 General Security

This section describes the general security for the application and/or refers to the product's security administration/installation guides and, where appropriate, the PA-DSS Implementation Guide or similar documents.

4.1 Authentication

NCR Silver connectivity is secured via TLS 1.2 or greater.

4.2 Services

It is recommended to not put any new apps onto the POS. This might cause performance degradation and security issues.

4.3 Wireless

NCR Silver POS component requires a wireless network to operate. It is a retailer's responsibility to configure wireless networks securely.

4.4 Software updates

Depending on the component, the updates are distributed in the following way:

- Silver Back Office – updates are handled by NCR Silver
- Android – updates are pushed directly into the app
- iOS – updates are pushed to the Apple App Store

4.5 User access

Component	Access Controls
POS	<ul style="list-style-type: none"> • The user is required to enter an account manager username/password in order to register the device and download configuration information • The user is required to enter a PIN code to gain access to the POS functionality that is tied to the user's role. • User role limits the actions the logged in user can do • Restrictions can be granted when a user of higher-level access enters their PIN code when prompted by the POS
Silver Back Office	<ul style="list-style-type: none"> • The user is required to enter username/password before

Component	Access Controls
	<p>being allowed access to the website</p> <ul style="list-style-type: none">• The user is tied to a user role that can further limit their access to certain parts of the website

5 Data elements

This chapter defines the data used in this product.

5.1 Personal data

Consumer

Data	Justification
Name	<ul style="list-style-type: none"> • Verification purposes and identification of the consumer • Printing on the consumer receipt (based on configuration) • Searching in the consumer list
Address	<ul style="list-style-type: none"> • Optional – customer can decide to not to use this data • Communicating with the consumers • Shipping the online orders
Phone Number	<ul style="list-style-type: none"> • Optional – customer can decide to not to use this data • Sending text receipts • Communicating with the consumers • Searching in the consumer list
Email	<ul style="list-style-type: none"> • Optional – customer can decide to not to use this data • Communicating with consumers • Sending digital receipts • Searching in the consumer list
Birth date / Anniversary date	<ul style="list-style-type: none"> • Optional – customer can decide to not to use this data • Identifying consumers for birthday/anniversary promotions

Online eCommerce Consumer

Data	Justification
Name	<ul style="list-style-type: none"> • Displaying on reports and receipts
Email	<ul style="list-style-type: none"> • Communicating with customers
Phone Number	<ul style="list-style-type: none"> • Communicating with customers
Address	<ul style="list-style-type: none"> • Shipping
Credit Card data, including: <ul style="list-style-type: none"> • Card Name • Card Type • Expiration date • Last 4 digits • Reference number (Payment processors Token) 	<ul style="list-style-type: none"> • Payment processing

Employee

Data	Justification
Full Name	<ul style="list-style-type: none"> • Verification
Short Name	<ul style="list-style-type: none"> • Verification • Displaying on reports and receipts
Email	<ul style="list-style-type: none"> • Required for employees who have access to Silver Back Office • Verification • Communicating with employees • Logging into Silver Back Office
Phone Number	<ul style="list-style-type: none"> • Optional – customer can decide to not to use this data • Communicating with employees

5.2 Sensitive data

NCR Silver does not use any sensitive data, such as:

- Social media profiles
- Religion
- Politics
- Health/sex issues
- Biometrics
- CVs and other personal statements

It is customer's responsibility to avoid including any of the listed above sensitive data in consumer profile notes, categories, or attributes.

5.3 Assertion of need

All data listed in section 5.1 is necessary for NCR Silver to perform the functions described in the "Justification" column (see above).

5.4 Configuration options

Customers can choose to enable or disable the following functions:

- Loyalty function: as described in section 5.1, if the loyalty is enabled, a consumer name is required in order to add them to the loyalty program. If the loyalty is disabled, customers can choose to not to add any consumer profiles in the consumer list and to not store any of their personal data.
- "Welcome" and "Miss You" emails: if these emails are configured, email addresses of consumers who signed up for marketing emails will be used to deliver "Welcome" and "Miss You" messages. If the customer chooses to not to configure these emails, consumer emails will not be used for marketing purposes.

6 Data handling

This section covers product inputs and outputs, effectively the handling of an individual's data.

6.1 In-flight

POS:

- Data being transferred between POS and API servers are encrypted via TLS 1.2 or greater

Silver Back Office:

- All external connections to the host load balancers are encrypted via TLS 1.2 or greater
- TLS is terminated on the Load balancer and re-established back to the web servers
- Internal traffic to the databases is currently not encrypted. There is an ongoing initiative to encrypt all internal traffic

6.2 At rest

POS:

- Sensitive data (such as POS login PIN and passwords) are hashed at rest in the local POS database
- iOS devices - it is recommended to secure the iOS device via the recommended method of adding a passcode. Otherwise, there is no app level encryption on data at rest
- Android device – currently, there is no general encryption for any data in the database (at rest), except for the sensitive data (stated above)

Silver Back Office:

- All data at rest in the back office is encrypted via GCP's default disk encryption (AES-256). Google manages the keys
- Personal data is encrypted at a disk level

6.3 Sources

6.3.1 Internal

Persona	Internal source of personal data
Consumers	Personal data can be entered manually either by the consumer themselves through

Persona	Internal source of personal data
	the consumer facing display or by the cashier from POS.
Online eCommerce Consumers	Personal data can be entered manually by the customer through web browser.
Employees	Personal data can be entered manually by the customer

6.3.2 External agents

Consumer list can be bulk-loaded into Silver Back Office using a generic customer import template that is not tied to any specific external system.

If a 3rd party loyalty solution is enabled, it provides consumer names when consumer look-up is performed from POS.

6.4 Destinations

6.4.1 Internal

Consumer

Screen/Report	Data
POS > Customer Lookup	The following information is used for consumer look up and identification: <ul style="list-style-type: none"> • Name • Mobile phone number • Email address
POS > Ticket > Customer Info	Based on configuration, the following data may be displayed in the consumer info section: <ul style="list-style-type: none"> • Name (required) • Mobile phone number • Email • Address • Birth date
POS > Ticket > Receipt	If a consumer wants to receive a digital receipt, the following data may be displayed based on configuration: <ul style="list-style-type: none"> • Name • Email address

Screen/Report	Data
Receipt	Based on configuration, the receipt may display the following data: <ul style="list-style-type: none"> • Name • Mobile phone number • Email address • Address
Back Office > My Store > Customer Dashboard	Consumer name is displayed
Silver Essentials Back Office > Results > Reports > Offline Credit	Cardholder name is displayed
Back Office > Results > Reports > Customer Notes	Based on configuration, the following data may be displayed: <ul style="list-style-type: none"> • Name • Mobile phone number • Email address
Back Office > Results > Reports > Customer Sales	Based on configuration, the following data may be displayed: <ul style="list-style-type: none"> • Name • Email address
Back Office > Results > Reports > Customer List	Based on configuration, the following data may be displayed: <ul style="list-style-type: none"> • Name • Address • Email address • Phone number • Birth date
Silver Pro Restaurant Back Office > Results > Reports > House Accounts	Based on configuration, the following data may be displayed: <ul style="list-style-type: none"> • Name • Address • Email address • Phone number
Back Office > Results > POS Transactions	Based on configuration, consumer name might be displayed
Back Office > Customers > Customers	Based on configuration, the following data may be displayed: <ul style="list-style-type: none"> • Name • Phone number • Email address

Screen/Report	Data
Silver Pro Restaurant Back Office > Customers > House Accounts	Based on configuration, the following data may be displayed: <ul style="list-style-type: none"> • Phone number • Email address
Back Office > Results > POS Transactions > Ticket Details > Preview Receipt	Based on eCommerce configuration, the receipt may display the following consumer data: <ul style="list-style-type: none"> • Name • Mobile phone number • Email address • Shipping Address
eCommerce Email Receipt	Based on eCommerce configuration, the receipt is emailed to the consumer that may display the following data: <ul style="list-style-type: none"> • Name • Mobile phone number • Email address • Shipping Address

Employee

Screen/Report	Data
POS > Menu > Log Out	Employee name is displayed to identify a user logged into the app
POS > Menu > Info > Sales Associate	The following information is displayed to identify an employee assigned to the ticket: <ul style="list-style-type: none"> • Full name Short name
Receipt	Employee's short name is displayed on the receipt to identify who conducted the sale
Back Office > Results > Reports > Employee Activity	Employee name is displayed
Silver Essentials Back Office > Results > Reports > Price Overrides	Employee name is displayed
Silver Essentials Back Office > Results > Reports > Time Clock	Employee name is displayed
Back Office > Results > Reports > Tips	Employee name is displayed
Silver Pro Restaurant Back Office > Results	Employee name is displayed

Screen/Report	Data
> Reports > Labor Shifts	
Silver Pro Restaurant Back Office > Results > Reports > Void Audit	Employee name is displayed
Back Office > Results > POS Transactions	Employee name is displayed
Back Office > Employees > Employees	Employee name is displayed Additional information may be displayed based on configuration: <ul style="list-style-type: none"> • Email address • Phone number
Back Office > Employees > Time Clock	Employee name is displayed
Silver Pro Restaurant Back Office > Results > Financial Shifts	Based on configuration, employee name might be displayed
Silver Pro Restaurant Back Office > Results > Labor Shifts	Employee name is displayed
Back Office > eCommerce > Site Contact	Based on eCommerce configuration, the customer may display the following employee data: <ul style="list-style-type: none"> • Address • Phone Number • Email Address

6.4.2 External

NCR Silver supports generic data export for consumer list and reports that is not tied to any specific external system.

6.5 Messaging

Digital receipt and email communication with consumers features are native to NCR Silver. While it is up to the user to decide what information to include in the bulk, "Welcome", or "Miss you" communication, it is strongly advised to avoid including personal and sensitive information in the emails.

If a consumer creates a "Customer Account" while using the eCommerce website, a Verification email will be sent out to confirm the consumer account details.

7 Data management

This section is to describe how data is managed in a generic way within the product.

7.1 Storage

Consumer data is stored in the Silver Back Office, as well as locally in the POS database.

7.2 Retention

Consumer data is stored for all active customers. Ticket data is stored indefinitely.

7.3 Purging

All data associated with a deactivated customer is purged after 90 days since deactivation.

Customer can delete consumer data using the "Remove Customer" option in the Customer List on Silver Back Office.

8 Data Subject Access Request

8.1 Responsibilities

The product provided by NCR has no mechanism to prove that the identity of the person making a data subject access request is, in reality, that person.

The responsibility for validating the requestor of a data subject request and matching it uniquely with an account or other consumer data held within the NCR product remains with the customer.

NCR recommends that the customer implements robust procedures to address this area and exercises due caution before carrying out any actions which may be irreversible.

8.2 Verifying identity

The following data is used to verify NCR Silver users:

Consumer – name, email, or phone number (or a combination of these)

Employee – name and email if provided

8.3 Localization of data

NCR Silver has 3 cloud hosting centers in the U.S., UK, and Australia. Customers' data is also stored on POS devices. The host database serves as the master database, so all data can be accessed centrally.

8.4 Request for information

Persona	Request for Information
Consumer	<p>Consumers have no direct interaction with the system. The request will come from the customer.</p> <p>The customer can look-up for the consumer information using Customers screen on POS or in Silver Back Office.</p>
Employee	<p>Users with Store Manager or Account Manager access can look-up for employee information using Employees screen in the Silver Back Office.</p>

8.5 Request for amendment

Persona	Request for Amendment
Consumer	<p>Consumers have no direct interaction with the system. The request will come from the customer.</p> <p>The customer can update the consumer information using Customers screen on POS or in the Silver Back Office.</p>
Employee	<p>Users with Store Manager or Account Manager access can update employee information using Employees screen in the Silver Back Office.</p>

8.6 Request for erasure/to be forgotten

Persona	Request for Erasure
Consumer	<p>The customer can delete consumer information upon consumer's request using Customers screen in Silver Back Office.</p> <p>Upon deletion in the Back Office, consumer's past information will be masked in the reports.</p>
Employee	<p>Users with Store Manager or Account Manager access can delete employee information using Employees screen in the Silver Back Office.</p> <p>Upon deletion in the Back Office, employee's personal information will be removed from the employees list and future reports, but it will not be masked in the past employee activity reports because this data is necessary for audit.</p>

9 Consent

9.1 Limitations

Most of NCR Silver native touch points are not consumer facing. The only NCR Silver native touch-point that is consumer facing is the consumer facing display that has the capability to capture consumers' email addresses for digital receipts and email marketing.

9.2 Options

Persona	Consent
Consumers	<p>Consumers have no direct interaction with NCR Silver App. On POS the interaction is via the cashier. The cashier will be instructed to tell the consumer the privacy statement and get consent.</p> <p>Consumers are requested for e-mail address when they want to get a digital receipt. When entering the email address, consumers have the option to subscribe to email marketing via the "Subscribe to Email Marketing" checkbox on the consumer facing display.</p>
Employees	<p>Employees have no direct interaction with NCR Silver when entering the details. The user entering the employee details (Store Manager or Account Manager back office access is required) will be instructed to tell them the privacy statement and get consent.</p>

9.3 Record keeping

N/A because the product doesn't show any privacy notice or consent.

9.4 Consent "exchange"

N/A because the product doesn't show any privacy notice or consent.

10 Privacy

10.1 Privacy notice

Persona	Consent
Consumers	<p>Consumers have no direct interaction with NCR Silver App. On POS the interaction is via the cashier. The cashier will be instructed to tell the consumer the privacy statement and get consent.</p> <p>Consumers are requested for e-mail address when they want to get a digital receipt. When entering the email address, consumers have the option to subscribe to email marketing via the “Subscribe to Email Marketing” checkbox on the consumer facing display.</p>
Employees	<p>Employees have no direct interaction with NCR Silver when entering the details. The user entering the employee details (Store Manager or Account Manager back office access is required) will be instructed to tell them the privacy statement and get consent.</p>

10.2 Configuration and change

N/A because the product doesn't show any privacy notice or consent.

10.2.1 Privacy notice content

It is the responsibility of the data controller to provide the privacy notice content as there may be many more systems and processes that lie in front of or behind an NCR product than just that sole NCR product.

10.3 Privacy “exchange”

N/A because the product doesn't show any privacy notice or consent.

10.4 Record keeping

N/A because the product doesn't show any privacy notice or consent.

11 Logging

NCR Silver does not support data access or modification logging at this moment.