Columbus DSGVO / GDPR

Specification

columbus

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Contents

1   Introduction

Protection of personal data (from 2018)

Summary

Regulation (EU) 2016/679 — protection of natural persons with regard to the processing of personal data and the free movement of such data

The aim of the regulation

It allows European Union (EU) citizens to better control their personal data. It also modernises and unifies rules allowing businesses to reduce red tape and to benefit from greater consumer trust.

The general data protection regulation (GDPR) is part of the EU data protection reform package, along with the data protection directive for police and criminal justice authorities.

Key points

Citizens' rights

The GDPR strengthens existing rights, provides for new rights and gives citizens more control over their personal data. These include:

* Easier access to their data — including providing more information on how that data is processed and ensuring that that information is available in a clear and understandable way
* A new right to data portability — making it easier to transmit personal data between service providers
* A clearer right to erasure ('right to be forgotten') — when an individual no longer wants their data processed and there is no legitimate reason to keep it, the data will be deleted
* Right to know when their personal data has been hacked — companies and organisations will have to inform individuals promptly of serious data breaches. They will also have to notify the relevant data protection supervisory authority.

Rules for businesses

The GDPR is designed to create business opportunities and stimulate innovation through a number of steps including:

* A single set of EU-wide rules — a single EU-wide law for data protection is estimated to make savings of €2.3 billion per year
* A data protection officer, responsible for data protection, will be designated by public authorities and by businesses which process data on a large scale
* One-stop-shop — businesses only have to deal with one single supervisory authority (in the EU country in which they are mainly based)
* EU rules for non-EU companies — companies based outside the EU must apply the same rules when offering services or goods, or monitoring behaviour of individuals within the EU
* Innovation-friendly rules — a guarantee that data protection safeguards are built into products and services from the earliest stage of development (data protection by design and by default)
* Privacy-friendly techniques such as pseudonymisation (when identifying fields within a data record are replaced by one or more artificial identifiers) and encryption (when data is coded in such a way that only authorised parties can read it)
* Removal of notifications — the new data protection rules will scrap most notification obligations and the costs associated with these. One of the aims of the data protection
* Regulation is to remove obstacles to free flow of personal data within the EU. This will make it easier for businesses to expand

- Impact assessments — businesses will have to carry out impact assessments when data processing may result in a high risk for the rights and freedoms of individuals
- Record-keeping — SMEs are not required to keep records of processing activities, unless the processing is regular or likely to result in a risk to the rights and freedoms of the person whose data is being processed.

Review

The European Commission must submit a report on the evaluation and review of the regulation by 25 May 2020.

From when does the regulation apply?

The GDPR will apply as of 25 May 2018.

More information

- Press release (European Commission):
  http://europa.eu/rapid/press-release_MEMO-15-6385_en.htm
- 2018 reform of EU data protection rules' (European Commission):
  https://ec.europa.eu/commission/priorities/justice-and-fundamental-rights/data-protection/2018-reform-eu-data-protection-rules_en

2 Manage Personal Data

2.1 Enable / Disable Personal Data

2.1.1 Auto-register device & user

Because for the changes for GDPR, the auto registration for objects (Device or User) is **blocked** by default. That concerns:

- New devices by PXE
- New devices by Management Client
- New users by Management Client
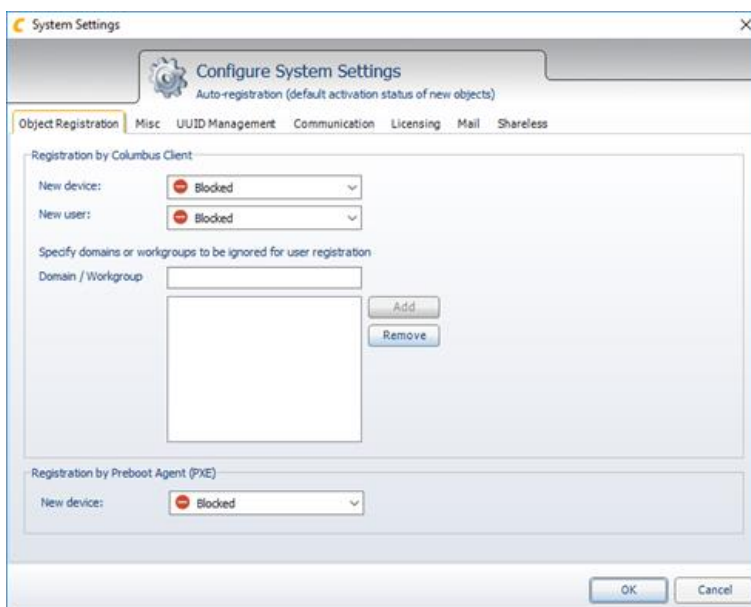
2.1.2   Base inventory

Because for the changes for GDPR, obtain for inventory data containing personal data is switched off by default. That concerns:

- Last Columbus User / Machine
- MAC Address
- TCP/IP address
- Windows registered owner
- Windows registered organization
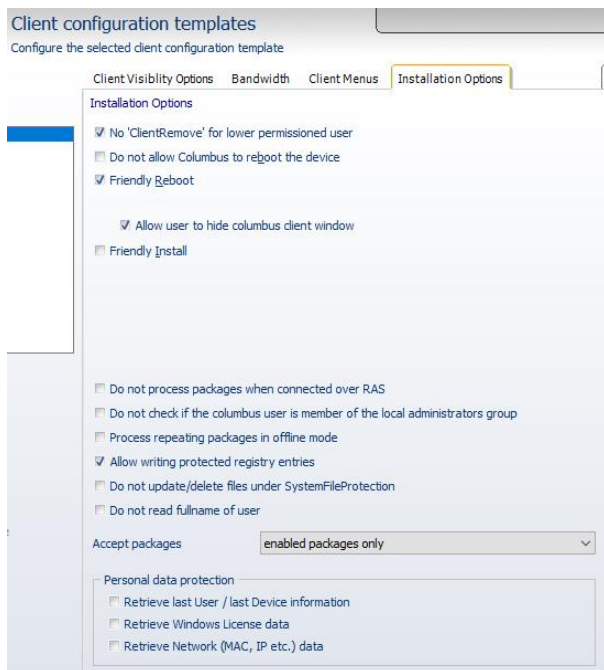
2.1.3   Corporate inventory

Because for the changes for GDPR, obtain for inventory data containing personal data is switched off by default. That concerns:

- Last Columbus User / Machine
- MAC Address
- TCP/IP address
- Windows registered owner
- Windows registered organization
- Windows product key

- **HardwareList.xml**
  - <OperatingSystem classname="TOperatingSystem">
  - <Summary>
  - <TCPIP classname="TTCPIP">

- **HardwareScan.csv**
  - LastLoggedOnUser
  - LastLoggedOnSAMUser
  - LastLoggedOnUserSID
  - MAC1, MAC2, MAC3, MAC4
  - IPAddressV4, IPAddressV6

- **InventoryItems.csv**
  - "OS.System.RegisteredUser"
  - "OS.System.Organization"
  - "OS.System.ProductKey"

3   Personal data in Columbus

In this chapter

3.1   Columbus Management Console

Collected data

Data field	Content	Default collected / Deactivatable
User Login	Login name to login to Management Console	**Yes / No (Process relevant)**

Location Registry

Not stored on registry

Location Database

Not stored on Database

Location file system (Client)

C:\ProgramFilesX86\Columbus\Console\cmc.ini

Location file system (Server)

Not stored on Server file system

Data Clean-up

Database cleaned up when machine or user deleted in product.

Registry cleaned up when remove Management Client from device.

File system (Inventory) cleaned up when transmit to server.

File system (Inventory) cleaned up when import to Database.

3.2 Columbus Management Client

3.2.1 Log entries

Collected data

Data field	Content	Default collected / Deactivatable
User Login	Login name from User sessions to identify User	**Yes / No**

Location Registry

```
Not stored on Client file system
```

Location Database

```
Not stored on Database
```

Location file system (Client)

```
C:\Windows\brainware_N.log
C:\Windows\Columbus Log Files
```

Location file system (Server)

```
Not stored on Server file system
```

Data Clean-up

Database cleaned up when machine or user deleted in product.

Registry cleaned up when remove Management Client from device.

File system (Client) cleaned up when transmit to server.

File system (Server) cleaned up when import to Database.

3.2.2 Identification

Collected data

Data field	Content	Default collected / Deactivatable
User Login	Login name from User sessions to identify User	**Yes / No (Process relevant)**
SID	Login Account SID	**Yes / No (Process relevant)**
MAC Address	MAC for all local network adapter to identify Device	**Yes / No (Process relevant)**

Location Registry

```
[HKEY_LOCAL_MACHINE\SOFTWARE\WOW6432Node\BrainWare\Columbus\7\Client\Config\Caching]
```

Location Database

```
[Columbus].[dbo].[COOBJECTS]
```

Location file system (Client)

```
C:\Windows\Cache\$colcache$
```

Location file system (Server)

```
Not stored on Server file system
```

Data Clean-up

Database cleaned up when machine or user deleted in product.

Registry cleaned up when remove Management Client from device.

File system (Client) cleaned up when transmit to server.

File system (Server) cleaned up when import to Database.

3.2.3   Scripting

Collected data

Data field	Content	Default collected / Deactivatable
_ApplicationData	Path to application folder contains login name	**Yes / No**
_Desktop	Path to desktop folder contains login name	**Yes / No**
_Favorites	Path to favorites folder contains login name	**Yes / No**
_NetHood	Path to nethood contains login name	**Yes / No**
_Personal	Path to personal folder contains login name	**Yes / No**
_PrintHood	Path to printhood contains login name	**Yes / No**
_Programs	Path to programs folder contains login name	**Yes / No**
_Recent	Path to recent folder contains login name	**Yes / No**
_SendTo	Path to sendTo folder contains login name	**Yes / No**
_StartMenu	Path to startmenu folder contains login name	**Yes / No**
_Startup	Path to startup folder contains login name	**Yes / No**
_User	Contains user login name	**Yes / No**
_Personal	Path to personal folder contains login name	**Yes / No**

Location Registry

```
[HKEY_LOCAL_MACHINE\SOFTWARE\WOW6432Node\BrainWare\Variables\Static]
[HKEY_CURRENT_USER\SOFTWARE\BrainWare\Variables\Static]
```

Location Database

```
Not stored on Database
```

Location file system (Client)

```
Not stored on Client file system
```

Location file system (Server)

```
Not stored on Server file system
```

Data Clean-up

Database cleaned up when machine or user deleted in product.

Registry cleaned up when remove Management Client from device.

File system (Client) cleaned up when transmit to server.

File system (Server) cleaned up when import to Database.

3.2.4 Inventory – Base Set

Collected data

Data field	Content	Default collected / Deactivatable
Last Columbus User	Login name from last Columbus user session	**No / Yes**
MAC Address	MAC-address from primary network adapter	**No / Yes**
TCP/IP address	IP-address from primary network adapter	**No / Yes**
Windows Registered User	Name of Windows licensee	**No / Yes**
Windows Registered Organization	Organization of Windows licensee	**No / Yes**
Last Machine	Hostname from last Columbus device session	**No / Yes**

Location Registry

```
[HKEY_LOCAL_MACHINE\SOFTWARE\WOW6432Node\BrainWare\Feedback]
[HKEY_CURRENT_USER\SOFTWARE\BrainWare\Feedback]
```

Location Database

```
[Columbus].[dbo].[COPROPDATA]
```

Location file system (Client)

```
Not stored on Client file system
```

Location file system (Server)

```
Not stored on Server file system
```

Data Clean-up

Database cleaned up when machine or user deleted in product.

Registry cleaned up when remove Management Client from device.

File system (Client) cleaned up when transmit to server.

File system (Server) cleaned up when import to Database.

3.2.5   Inventory – Hardware Scan

Collected data

Data field	Content	Default collected / Deactivatable
Last logged on User	Login name from last interactive user logon	**No / Yes**
Last logged on User SID	SID value from last interactive user logon	**No / Yes**
Last logged on SAM User	SAM name from last interactive user logon	**No / Yes**
MAC1..4	Adapter 1..4 MAC address	**No / Yes**
IPADDRESSV4	Adapter 1 IP address v4	**No / Yes**
IPADDRESSV6	Adapter 1 IP address v6	**No / Yes**

Location Registry

```
Not stored on Client registry
```

Location Database

```
[Columbus].[dbo].[COHARDWARE]
```

Location file system (Client)

```
%ALLUSERSPROFILE%\Columbus
```

Location file system (Server)

```
%ColumbusShare%\InvData
```

Data Clean-up

Database cleaned up when machine or user deleted in product.

Registry cleaned up when remove Management Client from device.

File system (Client) cleaned up when transmit to server.

File system (Server) cleaned up when import to Database.

3.2.6   Inventory – File Scan

Collected data

Data field	Content	Default collected / Deactivatable
UserName	Login name from files, stored in User profile	**No / No**

Location Registry

```
Not stored on Client registry
```

Location Database

```
Not stored on Database (Upload to Spider LCM)
```

Location file system (Client)

```
%ALLUSERSPROFILE%\Columbus
```

Location file system (Server)

```
%ColumbusShare%\InvData
```

Data Clean-up

Database cleaned up when machine or user deleted in product.

Registry cleaned up when remove Management Client from device.

File system (Client) cleaned up when transmit to server.

File system (Server) cleaned up when import to Database.

3.2.7 Inventory – Software Scan

Collected data

No personal data will collected.

Location Registry

```
Not stored on Client registry
```

Location Database

```
[Columbus].[dbo].[COSOFTWARE]
```

Location file system (Client)

```
%ALLUSERSPROFILE%\Columbus
```

Location file system (Server)

```
%ColumbusShare%\InvData
```

Data Clean-up

Database cleaned up when machine or user deleted in product.

Registry cleaned up when remove Management Client from device.

File system (Client) cleaned up when transmit to server.

File system (Server) cleaned up when import to Database.

3.2.8　　Inventory – File Meter

Collected data

Data field	Content	Default collected / Deactivatable
UserName	Login name from process starter	No / No
UserDomain	Domain name from process starter	No / No
FilePath	Could contain %UserName% when start process in User profile	No / No

Location Registry

```
Not stored on Client registry
```

Location Database

```
Not stored on Database (Upload to Spider LCM)
```

Location file system (Client)

```
C:\Windows\Temp\FileMeter_temporary.csv
%ALLUSERSPROFILE%\Columbus
```

Location file system (Server)

```
%ColumbusShare%\InvData
```

Data Clean-up

Database cleaned up when machine or user deleted in product.

Registry cleaned up when remove Management Client from device.

File system (Client) cleaned up when transmit to server.

File system (Server) cleaned up when import to Database.

3.2.9　　Inventory – Inventory Items

Collected data

Data field	Content	Default collected / Deactivatable
Windows Registered User	Name of Windows licensee	No / Yes
Windows Registered Organization	Organization of Windows licensee	No / Yes
Windows Product Key	Windows Product Key	No / Yes
Network.Adapter.x	IP and MAC for all local network adapter	No / Yes

Location Registry

```
Not stored on Client registry
```

Location Database

```
Not stored on Database (Upload to Spider LCM)
```

Location file system (Client)

```
%ALLUSERSPROFILE%\Columbus
```

Location file system (Server)

```
%ColumbusShare%\InvData
```

Data Clean-up

Database cleaned up when machine or user deleted in product.

Registry cleaned up when remove Management Client from device.

File system (Client) cleaned up when transmit to server.

File system (Server) cleaned up when import to Database.

3.2.10   Inventory – HardwareList

Collected data

Data field	Content	Default collected / Deactivatable
MAC1	MAC for primary local network adapter	**No / Yes**
IP	IP for primary local network adapter	**No / Yes**
NetworkAdapter_x	IP and MAC for all local network adapter	**No / Yes**
RegisteredUser	Name of Windows licensee	**No / Yes**
RegisteredOrganisation	Organization of Windows licensee	**No / Yes**
Windows Product Key	Windows Product Key	**No / Yes**

Location Registry

```
Not stored on Client registry
```

Location Database

```
[Columbus].[dbo].[COPROPDATA]
```

Location file system (Client)

```
%ALLUSERSPROFILE%\Columbus
```

Location file system (Server)

```
%ColumbusShare%\InvData
```

Data Clean-up

Database cleaned up when machine or user deleted in product.

Registry cleaned up when remove Management Client from device.

File system (Client) cleaned up when transmit to server.

File system (Server) cleaned up when import to Database.

3.2.11   Inventory – SWIDTag

Collected data

No personal data collected.

Location Registry

```
Not stored on Client registry
```

Location Database

```
Not stored on Database (Upload to Spider LCM)
```

Location file system (Client)

```
%ALLUSERSPROFILE%\Columbus
```

Location file system (Server)

```
%ColumbusShare%\InvData
```

Data Clean-up

Database cleaned up when machine or user deleted in product.

Registry cleaned up when remove Management Client from device.

File system (Client) cleaned up when transmit to server.

File system (Server) cleaned up when import to Database.

3.2.12   Inventory – Datacenter Inventory

3.2.13   Imaging

Collected data

Disk Image created for full disk content. All information during creation for image saved in image. Images stored on Columbus Server.

Location Registry

```
Not stored on Client registry
```

Location Database

```
Not stored on Database
```

Location file system (Client)

```
Not stored on Client file system
```

Location file system (Server)

```
%ColumbusShare%\ImgDepot
```

Data Clean-up

Manual clean-up need.

3.2.14   Databackup

Collected data

No default backup, only enabled by Customer.

Location Registry

```
Not stored on Client registry
```

Location Database

```
Not stored on Database
```

Location file system (Client)

```
Not stored on Client file system
```

Location file system (Server)

```
%ColumbusShare%\Blockstore
```

Data Clean-up

Manual clean-up need.

3.3   Columbus Inventory Scanner (Windows)

Same behaviour like chapters described for Columbus Management Client:

- Log entries
- Inventory – Hardware Scan
- Inventory – Software Scan
- Inventory – File Scan
- Inventory – Inventory Items
- Inventory – HardwareList
- Inventory – SWIDTag

3.4   Columbus Inventory Agent (Windows)

Same behaviour like chapters described for Columbus Management Client:

- Log entries
- Inventory – Hardware Scan
- Inventory – Software Scan
- Inventory – File Scan
- Inventory – File Meter
- Inventory – Inventory Items
- Inventory – HardwareList
- Inventory – SWIDTag

3.5   Columbus Inventory Scanner (non-Windows)

Same behaviour like chapters described for Columbus Management Client:

- Inventory - Datacenter Inventory

3.6   Columbus OSDeploy Service

Same behaviour like chapters described for Columbus Management Client:

- Log entries
- Identification
- Scripting

3.7   Columbus Infrastructure

Same behaviour like chapters described for Columbus Management Client:

- Log entries
- Identification

3.7.1   Columbus PXE Service

Same behaviour like chapters described for Columbus Management Client:

- Log entries
- Identification

3.7.2   Active Directory Importer

Same behaviour like chapters described for Columbus Management Client:

- Log entries
- Identification

Important	If deleted in Active Directory, the user or device object must also be deleted in Columbus too.

Collected data

Data field	Content	Default collected / Deactivatable
objectSID	SID for user AD-account	**No / No**
Fullname	Full name for user AD-account	**No / No**
userPrincipalName	Principal name for user AD-account	**No / No**
samAccountName	SAM for user AD-account	**No / No**
mail	Mail address for user AD-account	**No / No**
telephoneNumber	Phone number for user AD-account	**No / No**
distinguishedName	Distinguished name for user AD-account	**No / No**

Location Registry

```
Not stored on Client registry
```

Location Database

```
[Columbus].[dbo].[COOBJECTS]
```

Location file system (Client)

```
Not stored on Client file system
```

Location file system (Server)

```
Not stored on Server file system
```

Data Clean-up

Database cleaned up when machine or user deleted in product.

Registry cleaned up when remove Management Client from device.

File system (Client) cleaned up when transmit to server.

File system (Server) cleaned up when import to Database.

3.8   Columbus WinPE Application

Same behaviour like chapters described for Columbus Management Client:

- Identification

3.9   Columbus Audit Module

Collected data

No default collection, only when enabled by Customer.

Location Registry

```
Not stored on Client registry
```

Location Database

```
[Audit].[BWLOG]
```

Location file system (Client)

```
Not stored on Client file system
```

Location file system (Server)

```
%ColumbusShare%\Blockstore
```

Data Clean-up

Manual clean-up need.