

# GDPR at Eastman

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8.22.18

# Today's Agenda:

- Let's Play a Game!
- GDPR Overview
- What this Means for Consumers
- What this Means for Eastman
  - Methodology, Tactics, Benefits & Lessons
- What this Means for YOU

# Let's Play a Game!

On your cell phone, go to [kahoot.it](https://kahoot.it)

# What is GDPR?

- Applies to organizations that are established
  - In one or more Member State
  - Outside the EU if they
    - Process personal data of EU residents
    - Monitor behavior of EU residents
- Protects personal data of the natural person and the processing of that data
  - Employee, alumni, dependent, contractor, supplier, and customer personal data
  - Marketing, Procurement, Human Resources, and Sales
- Focuses on data subject rights
- Enforceable by May 25, 2018
- Fines up to \$20M Euro or 4% global turnover



# Requirements



**What this Means for Consumers**

# Eastman's Methodology

# Eastman's Methodology

- Identify Chief Privacy Officer and Develop Privacy Core Team
- Develop one single source of truth - the CAI
- Grow a cross-functional team with a PM to prep
- Create precedent on a case-by-case basis
- Put the customer first
- Prep for a deluge
- Segment by BU, not by EU
- Define Roles & Responsibilities
- Weekly Stand-Ups
- Plan the Work, Work the Plan (and commit to it)

# The Tactics

# Eastman's GDPR Cross- Functional Team



# Global Marcom GDPR Scope

## Inform, Provide Access

- **Revised Privacy Policy, cookie policy for first-time visitor**, or every time they clear their cache
- **Embed form to allow users to request to manage data** (edit, move, export, how we're using)
  - Reporting from CAI

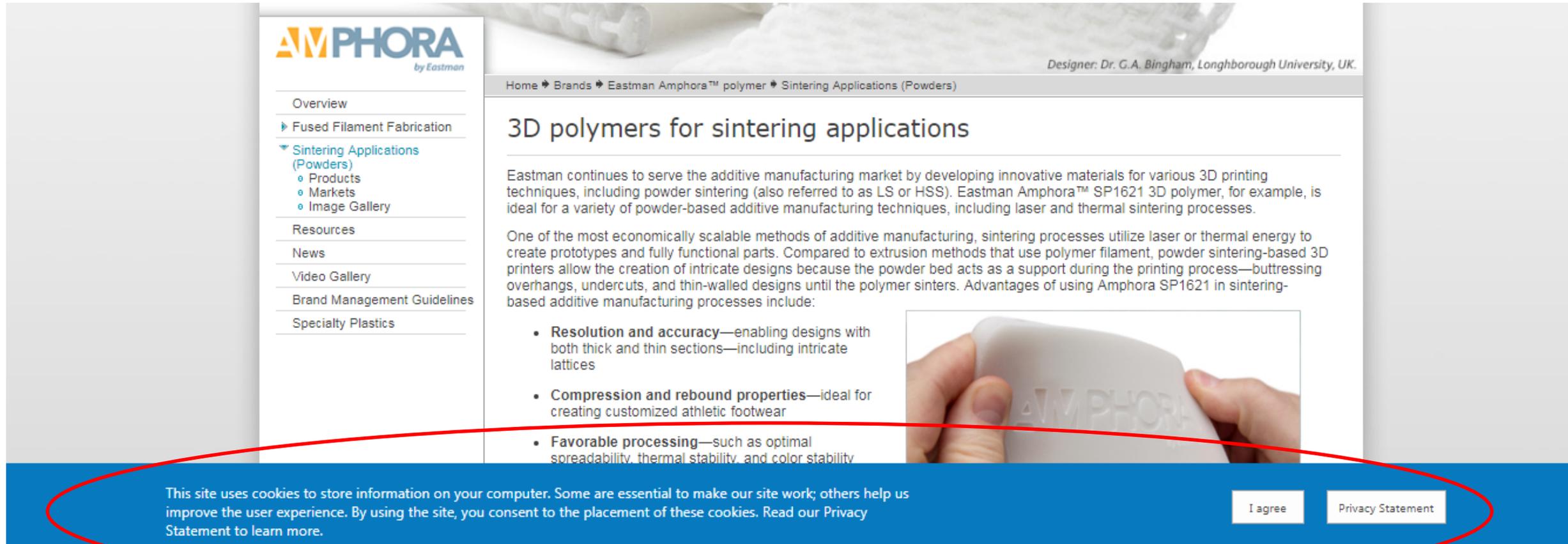
## Consolidate Systems

- **Consolidate** as many systems as possible (Mail Chimp, icontact Pro; more expected over time)
- **Migrate** all 12 BU Marketing forms to Marketo
- Implement tool for central storage for contacts to find, access and change data - **CAI**

## Data Compliance

- **Standardization** of all systems and websites, not just the EU
- Write **new SOP** for data maintenance moving forward – post go-live
- **Cleanse all email lists** “from this date forward” in March/April
- Write **new policy for subscriber lists, opt-ins and 3<sup>rd</sup> party affiliations**
  - Standardized Stand-by Statement for Employees; web support
- Work with Procurement to **identify and send addendums to 3<sup>rd</sup> party contracts**, as needed
- Standard **confirmation emails** to verify opt-ins for all lead acquisition sources

# Pop-Up Disclaimer on all sites



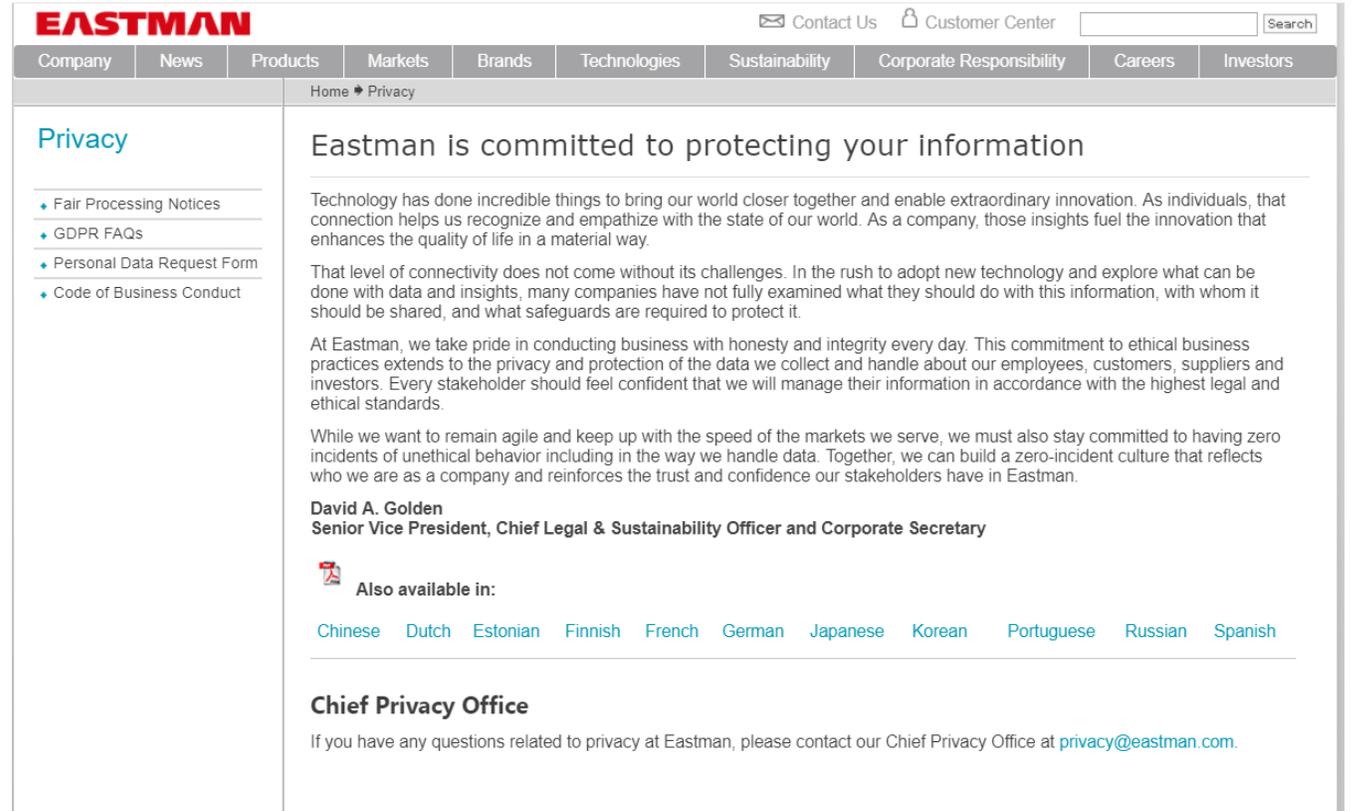
The screenshot displays the Eastman Amphora website. The top navigation bar includes the Amphora logo and a breadcrumb trail: Home > Brands > Eastman Amphora™ polymer > Sintering Applications (Powders). The main content area is titled "3D polymers for sintering applications" and contains introductory text and a list of benefits. A red oval highlights a blue pop-up disclaimer at the bottom of the page, which contains the following text and buttons:

This site uses cookies to store information on your computer. Some are essential to make our site work; others help us improve the user experience. By using the site, you consent to the placement of these cookies. Read our [Privacy Statement](#) to learn more.

# Updated Privacy Policy

## ■ *Must include:*

- How we collect & process data
- Data retention
- Security
- Right to obtain and correct data
- Cookies policy
- Contact (physical address and email of Privacy Officer)
- Links to other websites
- Behavioral targeting and re-targeting



The screenshot shows the Eastman website's Privacy Policy page. At the top, the Eastman logo is on the left, and navigation links for 'Contact Us' and 'Customer Center' are on the right. Below the logo is a horizontal menu with categories: Company, News, Products, Markets, Brands, Technologies, Sustainability, Corporate Responsibility, Careers, and Investors. The main content area is titled 'Privacy' and includes a sub-menu with links to 'Fair Processing Notices', 'GDPR FAQs', 'Personal Data Request Form', and 'Code of Business Conduct'. The main text states: 'Eastman is committed to protecting your information'. It discusses the benefits of technology, the challenges of data connectivity, and Eastman's commitment to ethical business practices. It also mentions the company's goal of zero incidents of unethical behavior. The page identifies David A. Golden as the Senior Vice President, Chief Legal & Sustainability Officer and Corporate Secretary. It provides a list of languages where the policy is available: Chinese, Dutch, Estonian, Finnish, French, German, Japanese, Korean, Portuguese, Russian, and Spanish. Finally, it identifies the Chief Privacy Office and provides the contact email: [privacy@eastman.com](mailto:privacy@eastman.com).

# Email/List Audit & Migration

iContact Pro



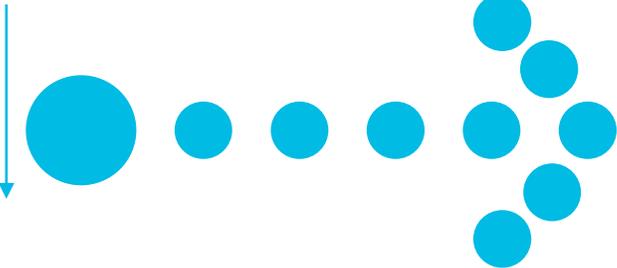
Excel/CSV Files



MailChimp



New Process Begins  
Immediately after the freeze  
ends for each business,  
respectively



# Email/List Audit & Migration

	March				April				May				
	5	12	19		3	10	17	24	1	8	15	22	29
<b>Agchem</b>													
List migration					█	█							
Confirmation email					█	█	█						
Freeze					█	█	█						
Contact us form migration								█	█	█			
<b>Animal nutrition</b>													
List migration					█	█							
Confirmation email					█	█	█						
Freeze					█	█	█						
<b>Care chemicals</b>													
List migration						█	█						
Confirmation email						█	█	█					
Freeze						█	█	█					
<b>Chemical intermediates</b>													
PVC Pre-show Email					█								
PVC Post-show Email							█						
ASC Pre-show Email (Deploy April 10)						█							
ASC Post-show Email								█					
List migration						█	█						
Confirmation email						█	█	█					
Freeze						█	█	█					
<b>Coatings and inks</b>													
ACS			█	█	█	█	█	█	█	█	█	█	█
List migration									█	█			
Confirmation email									█	█	█		
Freeze									█	█	█		
<b>Eastman Corporate</b>													
List migration									█	█			
Confirmation email									█	█	█		
UR form migration									█	█	█		
Freeze									█	█	█		
<b>Fibers</b>													
OTmore email					█								
List migration							█	█					
Confirmation email							█	█	█				
Vestera contact us form migration									█	█			
Freeze									█	█			
<b>Interlayers</b>													
S&E Pre-show email					█								
List migration							█	█					
Confirmation email							█	█					

# Internal Communications



Carpenter, Jessica B

● Akard, Travis; ○ Allen, Debbie; ○ Bailey, Jeffrey; ● Belote, Missy R; ● Cain, Rachel Horton; ○ Carpenter, Jessica B; ○ Carpenter, Stephen P; ○ Davis, Aimee L.; + 53 ▾

## Digital Marketing Announcement | GDPR Email and Form Migrations Begin Today

Retention Policy 2 Year Default Inbox Retention Policy (2 years)

Expires 4/2/2020

**i** You replied to this message on 4/4/2018 10:23 AM.

## GDPR Set to go Live May 25 | Email and Form Migrations Begin Today

### Email and Form Migration/Freeze

Heritage Eastman's email marketing systems, including MailChimp and iContact will be migrated to Marketo beginning today. The freeze on email sends and new form creation will be stair-stepped and dependent on the business's individual schedule for migration. The full timeline can be found [here](#). Most lead generation forms will be migrated to Marketo, except for Contact L which will be collapsed when we cutover to the new Content Management System in 2018/2019.

### What You Can Expect

Eastman's Digital Marketing account representatives will work with each group to ensure the accuracy and timeliness of emails moving forward. Because we're consolidating at least three systems during this migration, you can expect better turnaround times, higher click-through rates, and more engagement from users. Most importantly, Eastman will be GDPR ready, and positioned much better to cutover to a new Content Management System and Salesforce Dot Com.

### Eastman's Overarching GDPR Strategy

Eastman's GDPR Strategy is to capture all potential touchpoints or data points for any Personal Information in one single place, the Corporate Application Inventory (CAI). Eastman's Marketing Communications and Digital Marketing teams are adopting GDPR standards across digital marketing for heritage Eastman products. Similar laws are being considered for the United States and Mexico, and these early changes will prime us for future change and migrations to newer, more sophisticated technologies.

The CAI is being revamped because of this effort, and all team members in Marketing Communications and elsewhere are responsible for reporting any contact database and/or application w

# Confirmation Email

Hello,

We're cleaning up our email data and we need your help. We want to make sure that you receive communications from Eastman that are interesting and relevant to you. If you would still like to receive promotional updates on Eastman's innovative and technology-based solutions, please take a few seconds to update your email marketing preferences and contact information.

[UPDATE MY INFORMATION](#)

If you choose to remain on our mailing list, you may update your email preferences at any time. We value your privacy and a variety of security measures are in place to protect your information.

Sincerely,  
Eastman Privacy Team

**EASTMAN**

# Email Subscription Center

## Basic contact information

First name:  Last name:

Email:

What types of emails do you want to receive?

## Resources

Newsletters  Brochures  Product news and information

## Events

Tradeshows  Webinars  Conferences and roadshows

## Settings

Pause for 90 days:  Unsubscribe from ALL emails:

[Review our privacy policy.](#)

Submit

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**EASTMAN**

# Data Request Form

Home | Privacy | Personal Data Request Form

## Privacy

- Fair Processing Notices
- GDPR FAQs
- Personal Data Request Form
- Code of Business Conduct

### Personal Data Request Form

**Eastman respects your privacy**

At Eastman, we respect your privacy and are committed to the protection of your personal data. Please complete the form below if information on your personal data is requested. You will receive a confirmation via email that your request was received. Upon authentication of your identity, we will work to fulfill the request. This request will be completed within 30 days unless otherwise notified.

**First name:** \*

**Middle name:**

**Last name:** \*

**Email address:** \*

**Requester type:** \*

**User ID (if applicable):**

**Location:**

**Type of request:** \*

- Information
- Personal data
- Correct personal data
- Restrict personal data processing
- Delete personal data

**Comments:**

Form also available in:

- [Chinese](#)
- [Dutch](#)
- [Estonian](#)
- [French](#)
- [Chinese](#)
- [German](#)
- [Japanese](#)
- [Korean](#)
- [Portuguese](#)
- [Russian](#)
- [Spanish](#)

Legal | Privacy | SDS Finder | Supply Chain Responsibility | Site Index | Contact Us

# The Benefits

# The Benefits for Marcom/Advertising Pros

- Brand trust
- Data reliability
- One single source of truth
- Cleaner lists
- Integrated systems with APIs
- Quicker turnaround times
- Posture for the future
- Lower bounce rate
  - Better pricing on ad spend
- Higher engagement and click-through rates
  - Better keyword rankings

# The Lessons

# The Lessons Learned along the way...

- No one-size-fits-all solution
- Project management was key
- Power users and key players
- Don't get in the way of legitimate interest or business
- Review and Adjust
- Evaluate the true demand
- Resource appropriately
- Write clear definitions
- Manage expectations and R&R
- Don't stop!

# Managing Expectations Internally

- Scenarios and Who's on First (QRG)
- Working Smart with IT (Security Remediation and GDPR)
- Internal Emails
- Training Modules and Onboarding Support
- Standard Operating Procedures
- Cleaner, healthier lists
- Better engagement, more click throughs, more conversions
- Quicker ROI baseline
- Quicker Turnaround Times
- Better Quality Digital Communication
- Data integrity

# Marketing Privacy Responsibilities

- New Marketing contacts wanting to receive information:
  - First receipt of Eastman communication will provide information on how to manage preferences through the Subscription Center
  - Opt-out information will also be provided on every email communication

*Examples of collected contact information:*

- **Trade Shows**
  - Badge scan, etc. displays legitimate interest
  - Utilize distribution list sending communication with options to manage preferences through the Subscription Center
- **Business Cards**
  - Acceptance of the business card displays legitimate interest
  - Communication with options to manage preferences through the Subscription Center upon entry of information
- **3rd Party List Management**
  - 3rd Party must comply with global data privacy obligations to obtain consent to collect and share personal information
  - MarCom representative's responsibility to work with Procurement to add the Privacy Appendix and determine how the 3rd Party stores, handles, and receives consent

# Sales Privacy Responsibilities

- Support Chief Privacy Office
  - Provide regional assistance to compile personal information requested by the Area Privacy Coordinator when a data request is submitted through the Personal Data Request Form
- Customer and employee information in CRM is required for the purpose of legitimate interest to:
  - Streamline and automates business processes with cutting edge, logistical advantages
  - Synchronize across all channels enhancing sales forecasting
  - Align the business to drive sales and improve the customer and end user experience/efficiency
  - Drive a competitive environment among Eastman teams

**Thank you!**  
**Questions?**