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OPTASY

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GDPR Compliance in Drupal

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HELLO!

I am François Lemieux

Senior software developer.

Find me at:

https://www.drupal.org/u/classiccut

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*I am not a lawyer!

None of the information presented herein should be taken as legal advice

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1.

Presentation scope

FROM BROAD TO NARROW

- What is GDPR
- How does GDPR impact your Drupal site
- Available Drupal resources
- Consent Management & Cookies

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2.

What is GDPR

E.U. PRIVACY REGULATIONS

User rights

Definitions on what is “user data”, and the types of controls users can have on this data.

Consent

Users must know what data is being collected, and have control over the use of this data.

Obligations and penalties

Non-compliance comes with costs. Record keeping to demonstrate compliance.

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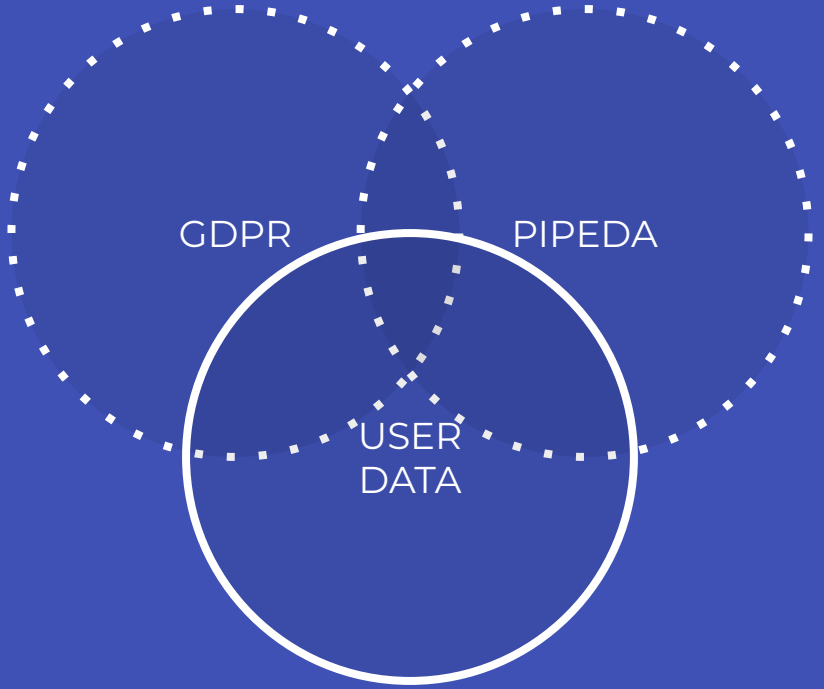
“

But… I’m in Canada! Why do I need to worry about E.U. regulations?

*see https://www.dataguidance.com/sites/default/files/gdpr_v_pipeda.pdf



THERE ARE SOME SIMILARITIES AND SOME DIFFERENCES

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3.

How does GDPR impact your Drupal site

HOW LARGE IS YOUR ORGANIZATION

More restrictions and obligations are placed on larger organizations (>250 employees), such as establishing a data protection officer role, and specifics related to large-scale user data processing.

UNDERSTANDING USER DATA

Accounts

User data stored for user accounts can impact GDPR compliance.

Analytics & social media

Are you tracking analytics? Is any user-centric data included? Any integration with social media platforms?

Consent

Do users of your site (logged-in or not!) know what data might be collected and how it's used?

Do they consent?

BUSINESS IMPACTS

Legal

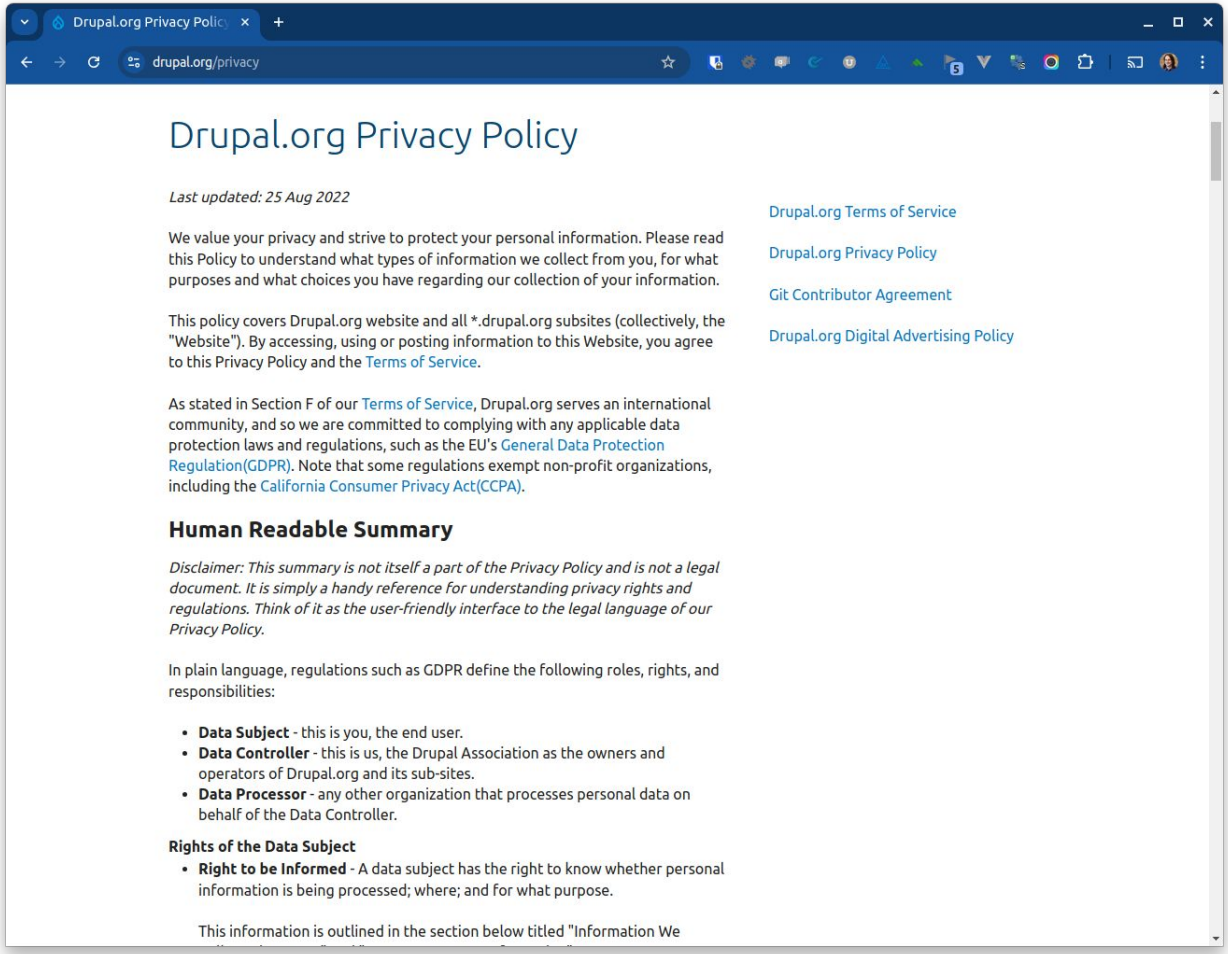
Privacy policy and disclaimers are required (including cookie policies).

Record keeping

Requirements vary based on the size of your organization.

Data security

Data breaches must be handled in specific ways.


Drupal.org Privacy Policy
drupal.org/privacy
Drupal.org Privacy Policy
Last updated: 25 Aug 2022
We value your privacy and strive to protect your personal information. Please read this Policy to understand what types of information we collect from you, for what purposes and what choices you have regarding our collection of your information.
This policy covers Drupal.org website and all *.drupal.org subsites (collectively, the "Website"). By accessing, using or posting information to this Website, you agree to this Privacy Policy and the Terms of Service.
As stated in Section F of our Terms of Service, Drupal.org serves an international community, and so we are committed to complying with any applicable data protection laws and regulations, such as the EU's General Data Protection Regulation(GDPR). Note that some regulations exempt non-profit organizations, including the California Consumer Privacy Act(CCPA).
Human Readable Summary
Disclaimer: This summary is not itself a part of the Privacy Policy and is not a legal document. It is simply a handy reference for understanding privacy rights and regulations. Think of it as the user-friendly interface to the legal language of our Privacy Policy.
In plain language, regulations such as GDPR define the following roles, rights, and responsibilities:
Data Subject - this is you, the end user.
Data Controller - this is us, the Drupal Association as the owners and operators of Drupal.org and its sub-sites.
Data Processor - any other organization that processes personal data on behalf of the Data Controller.
Rights of the Data Subject
Right to be Informed - A data subject has the right to know whether personal information is being processed; where; and for what purpose.
This information is outlined in the section below titled "Information We
Drupal.org Terms of Service
Drupal.org Privacy Policy
Git Contributor Agreement
Drupal.org Digital Advertising Policy

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4.

Available Resources

GDPR MODULE

- Contrib module/project
- Provides resources for compliance
- *Does not ensure compliance on its own!

Good starting point to understand and implement compliance, but not a complete solution

https://drupal.org/project/gdpr

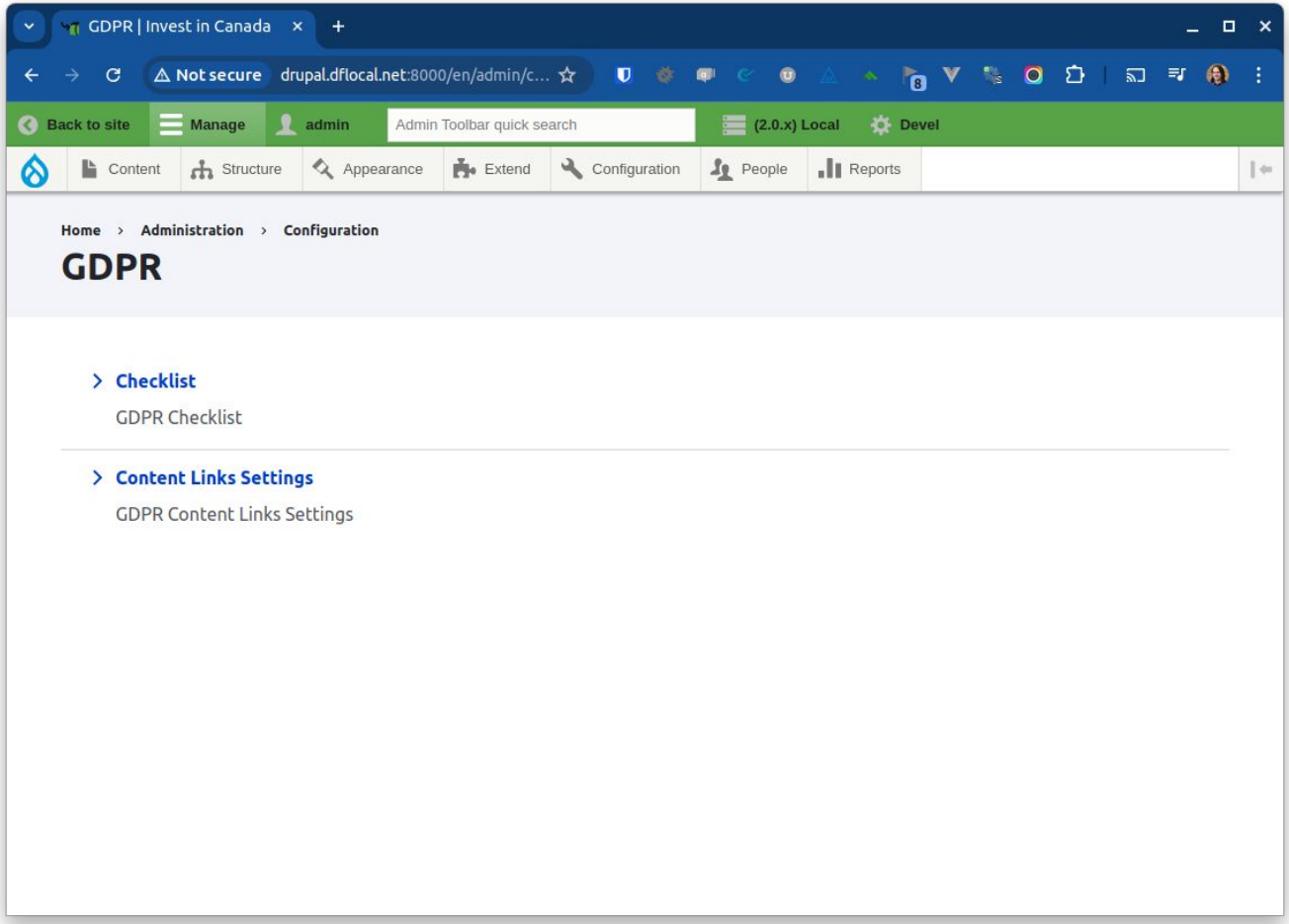
RESOURCES FOR GDPR READINESS

Checklist

Walkthrough of considerations, tasks (business and/or dev.), site features, and configuration.

Supporting modules

Provide specific resources for setting-up user agreements, tasks (data update/removal), data sanitization.



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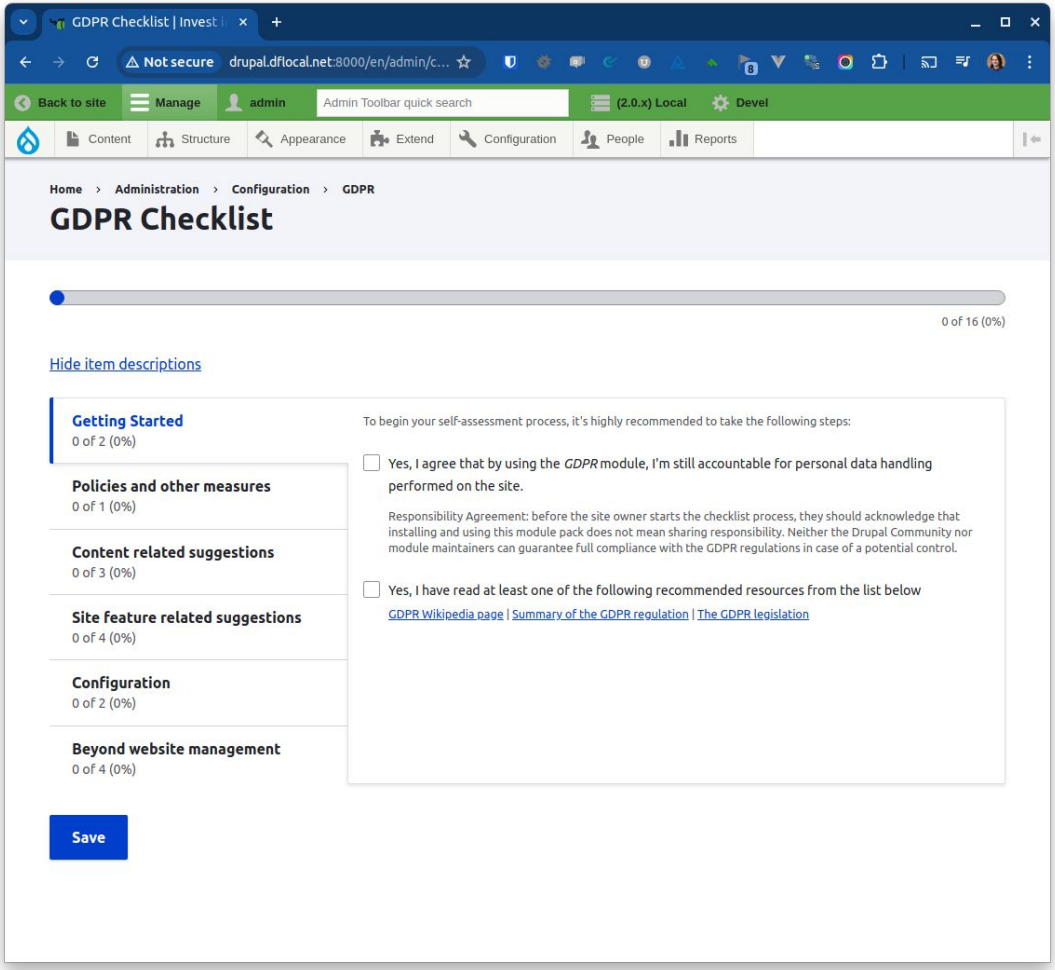

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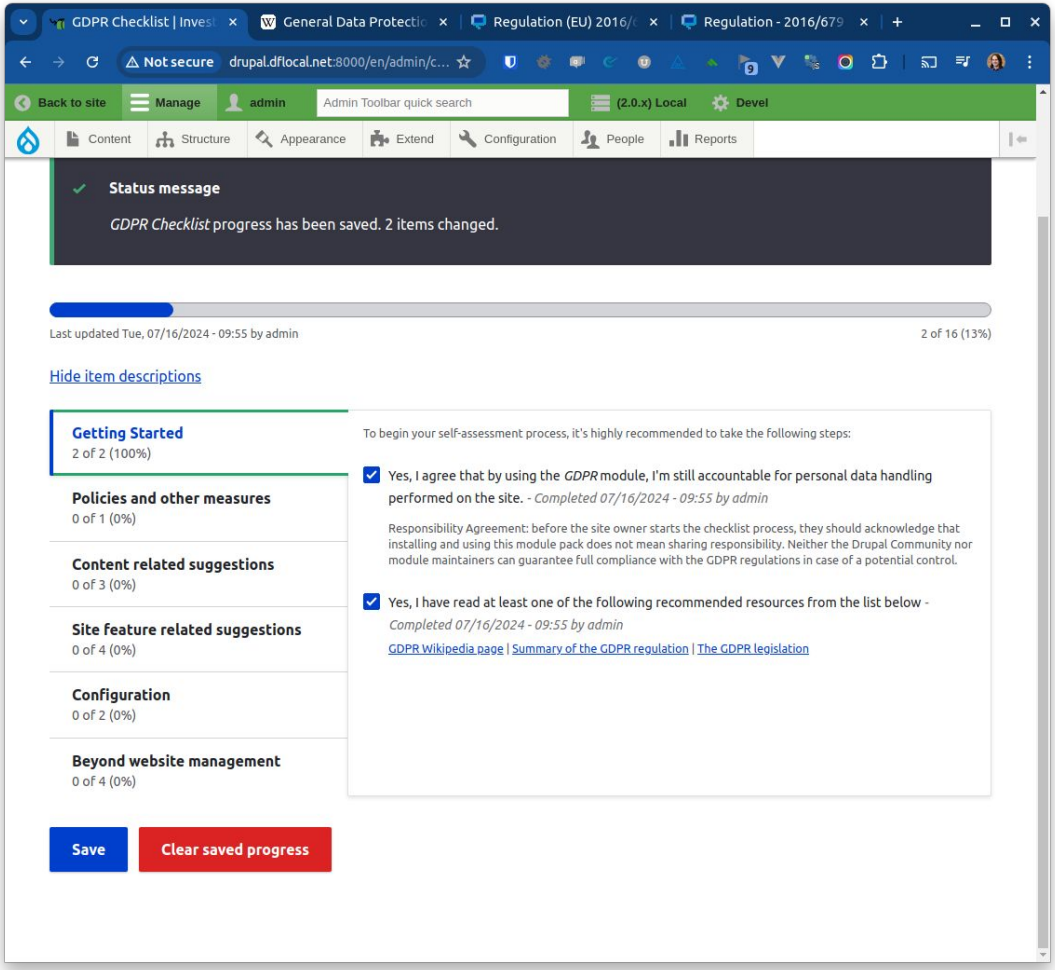
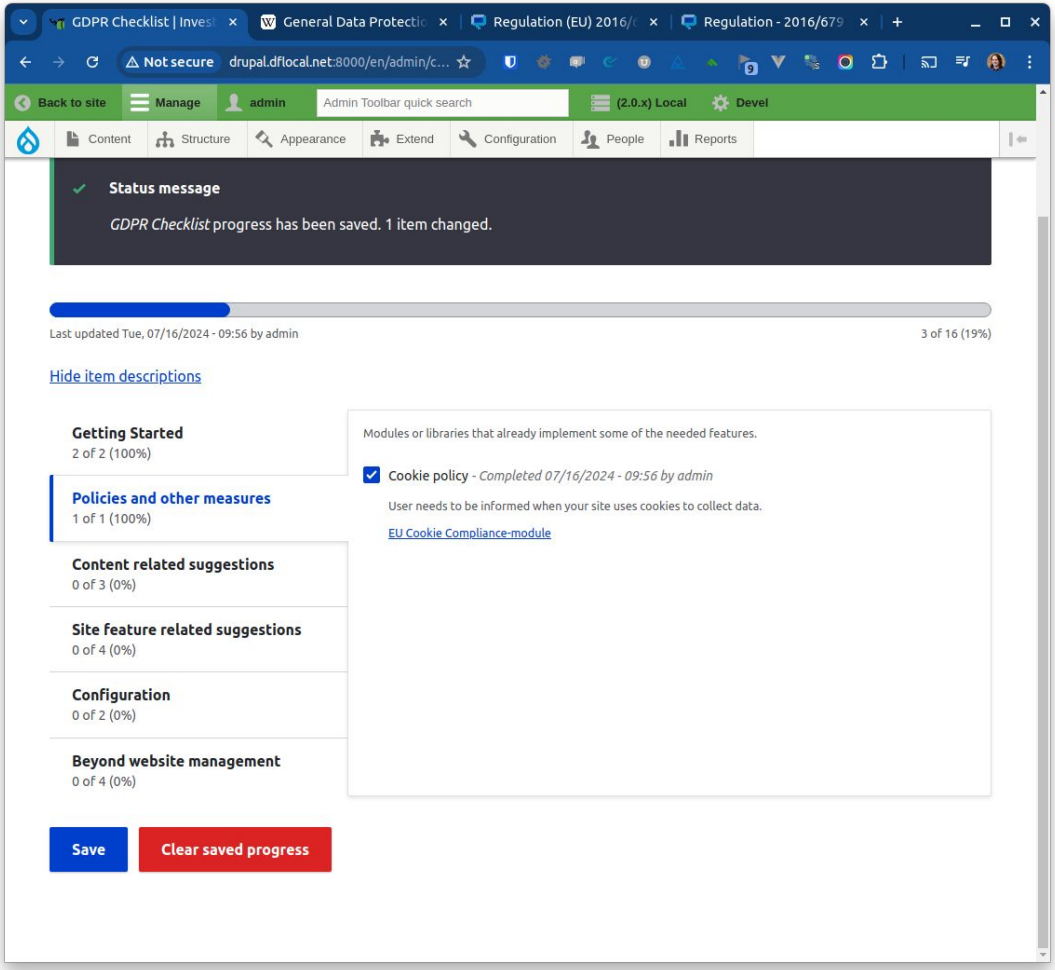


Coldfront Labs Inc.



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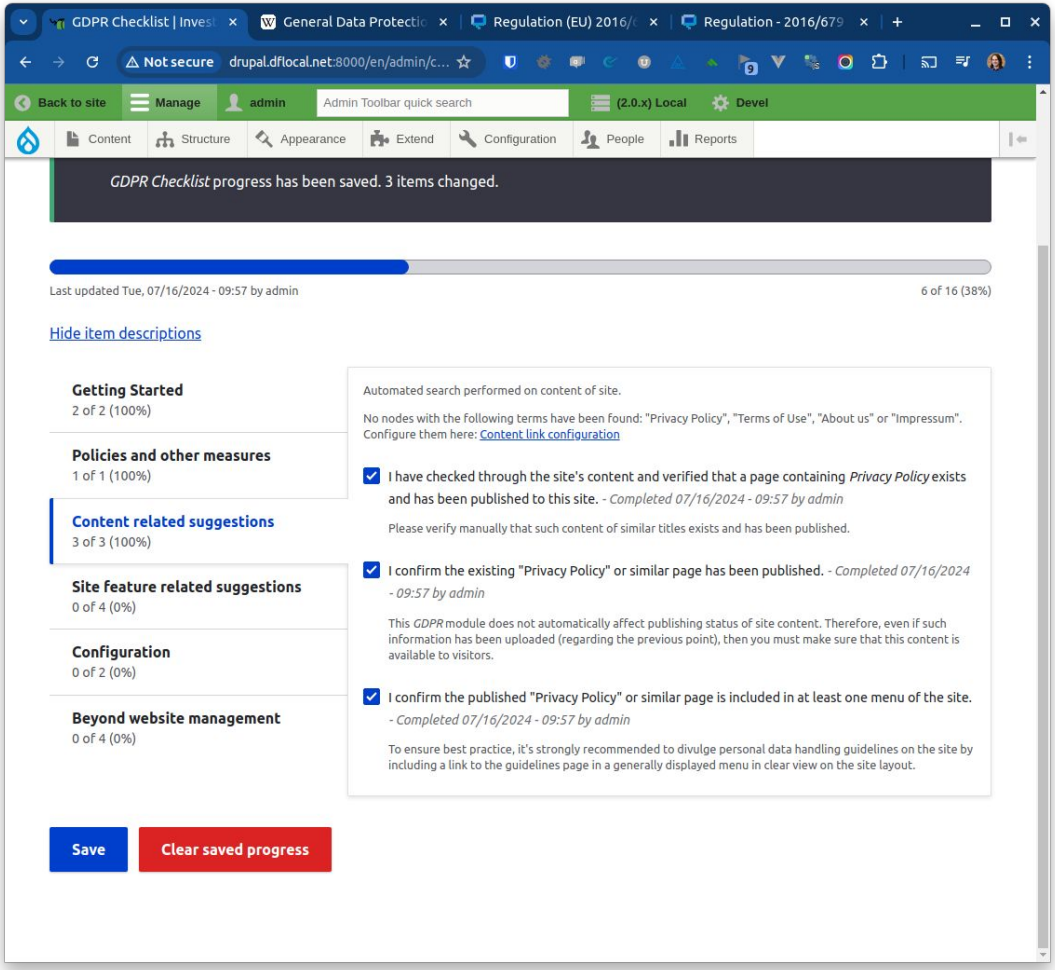

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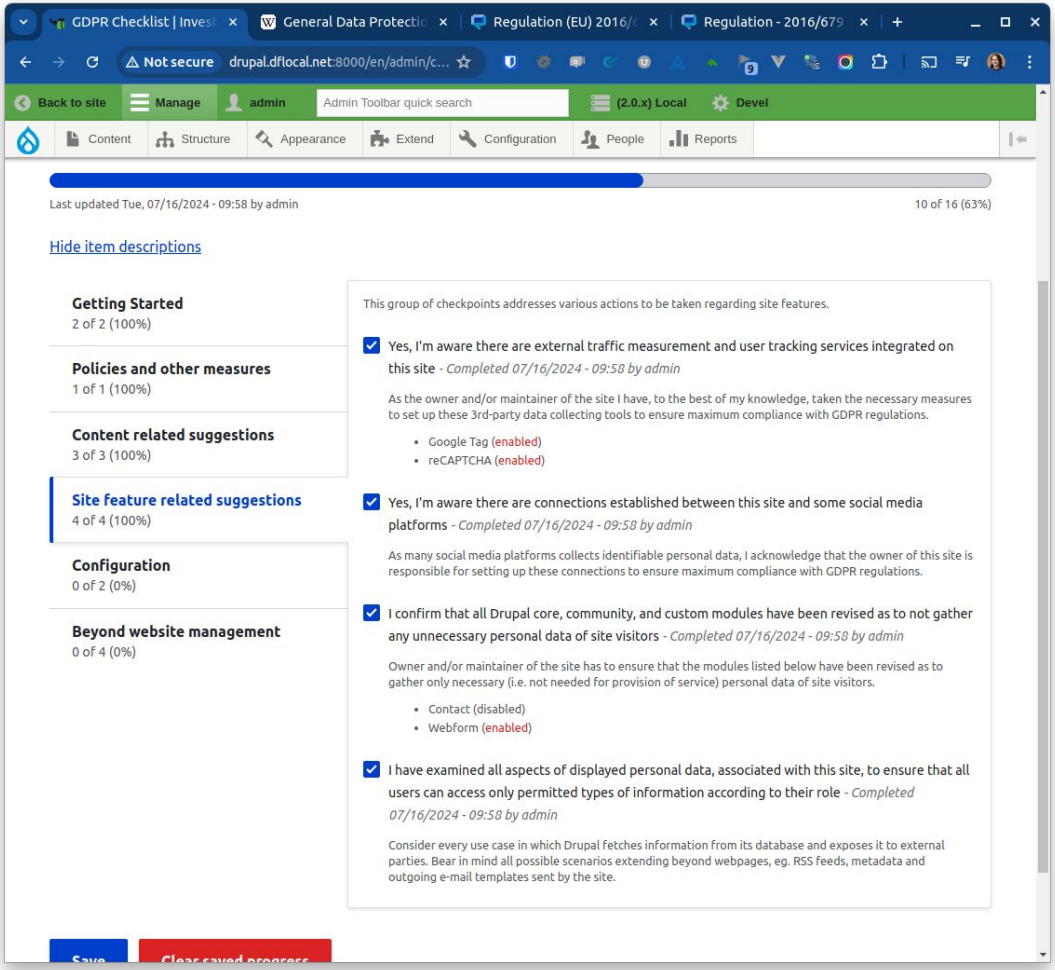
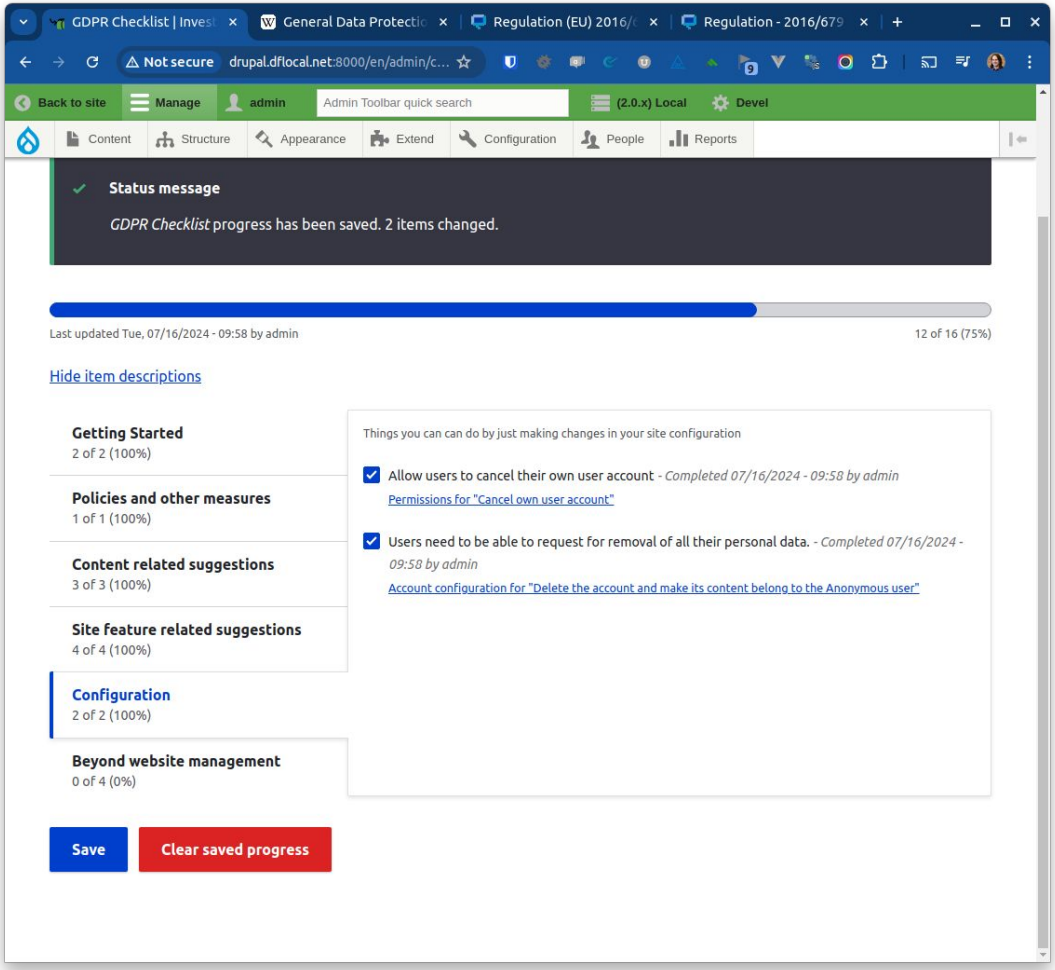


Coldfront Labs Inc.



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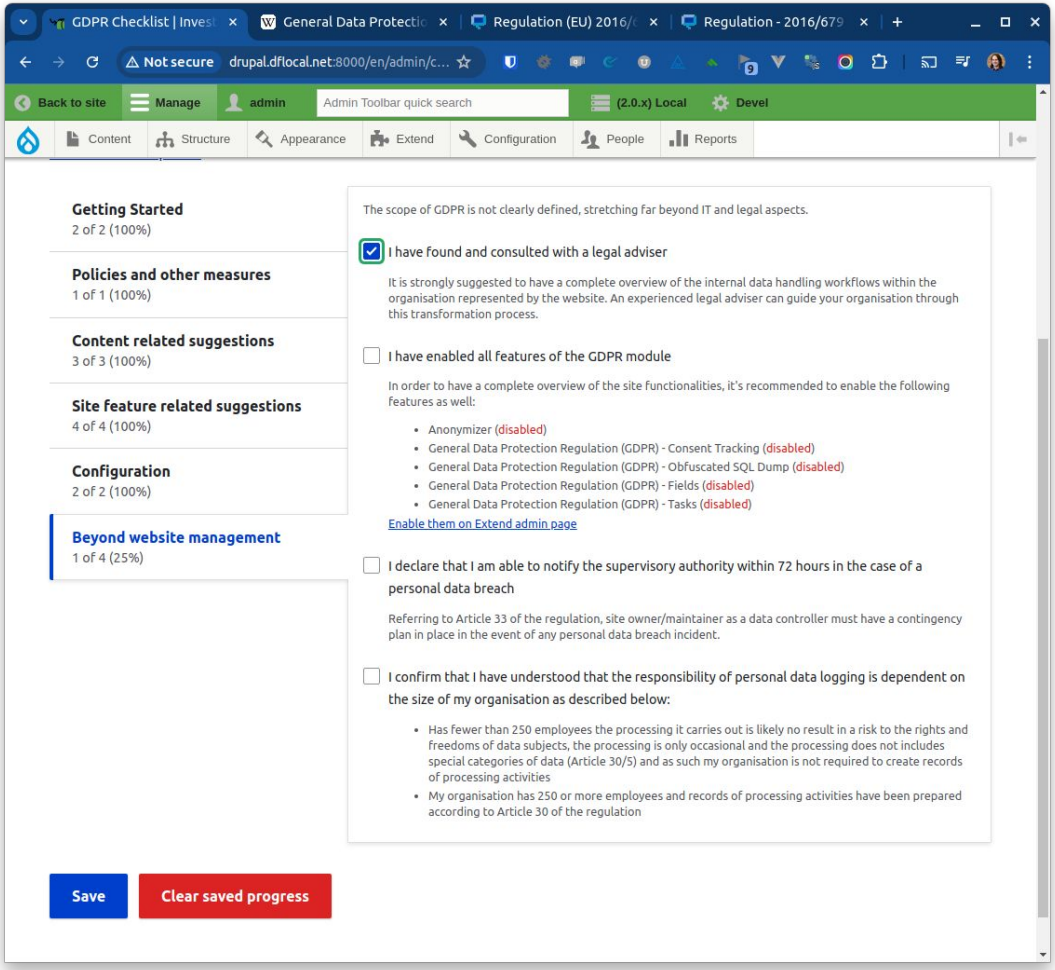

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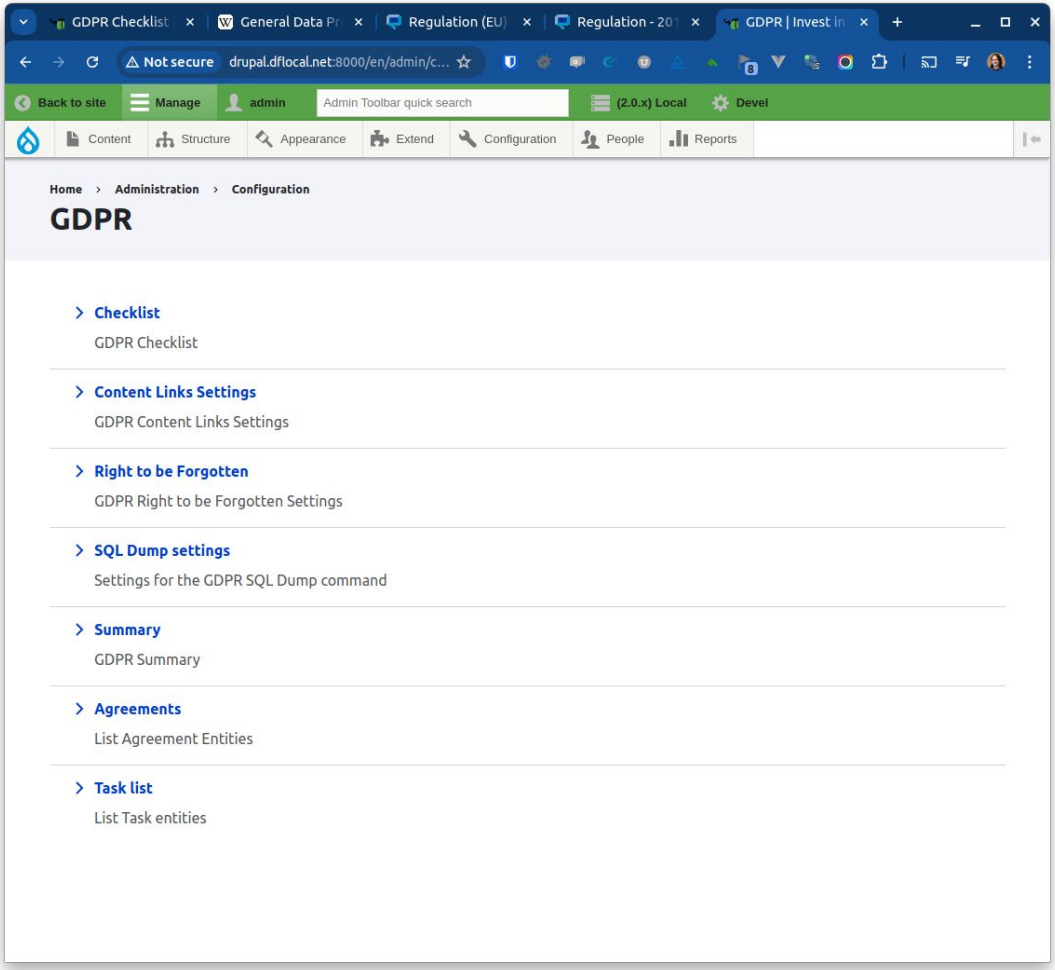

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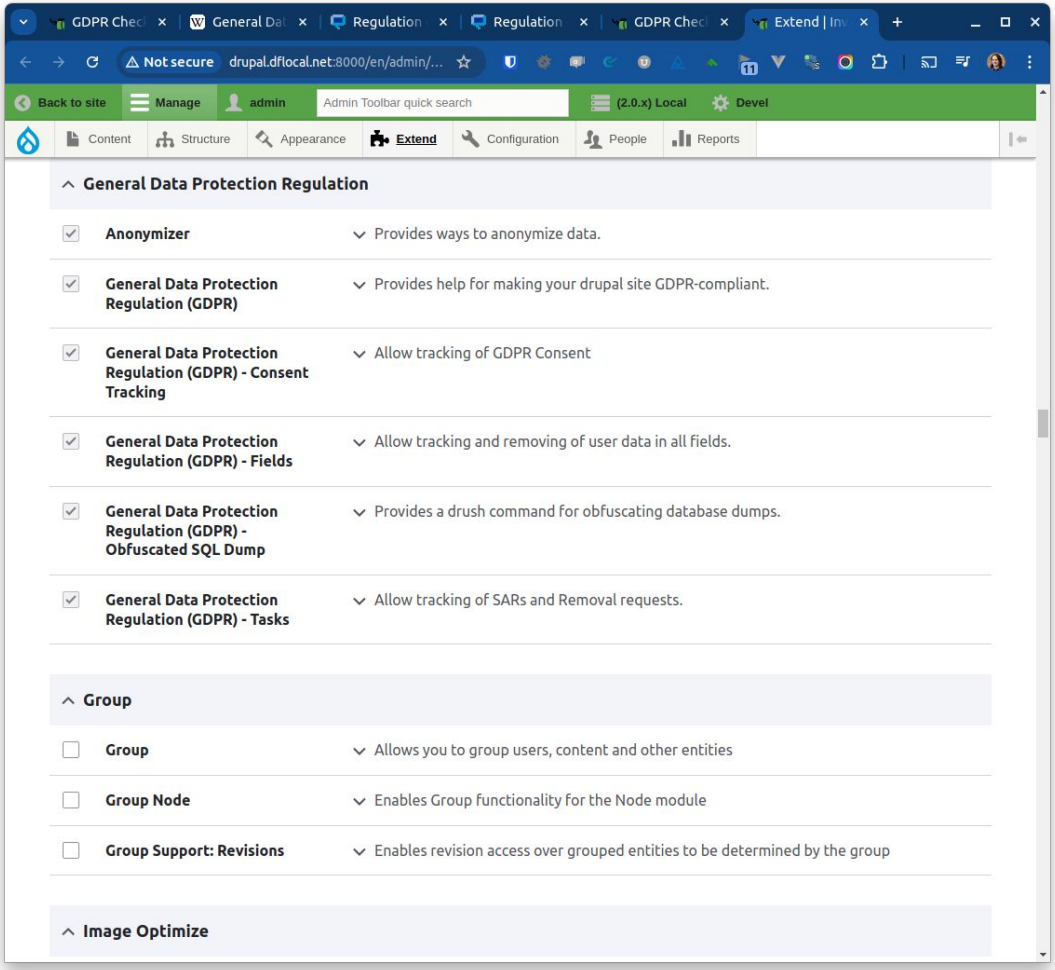
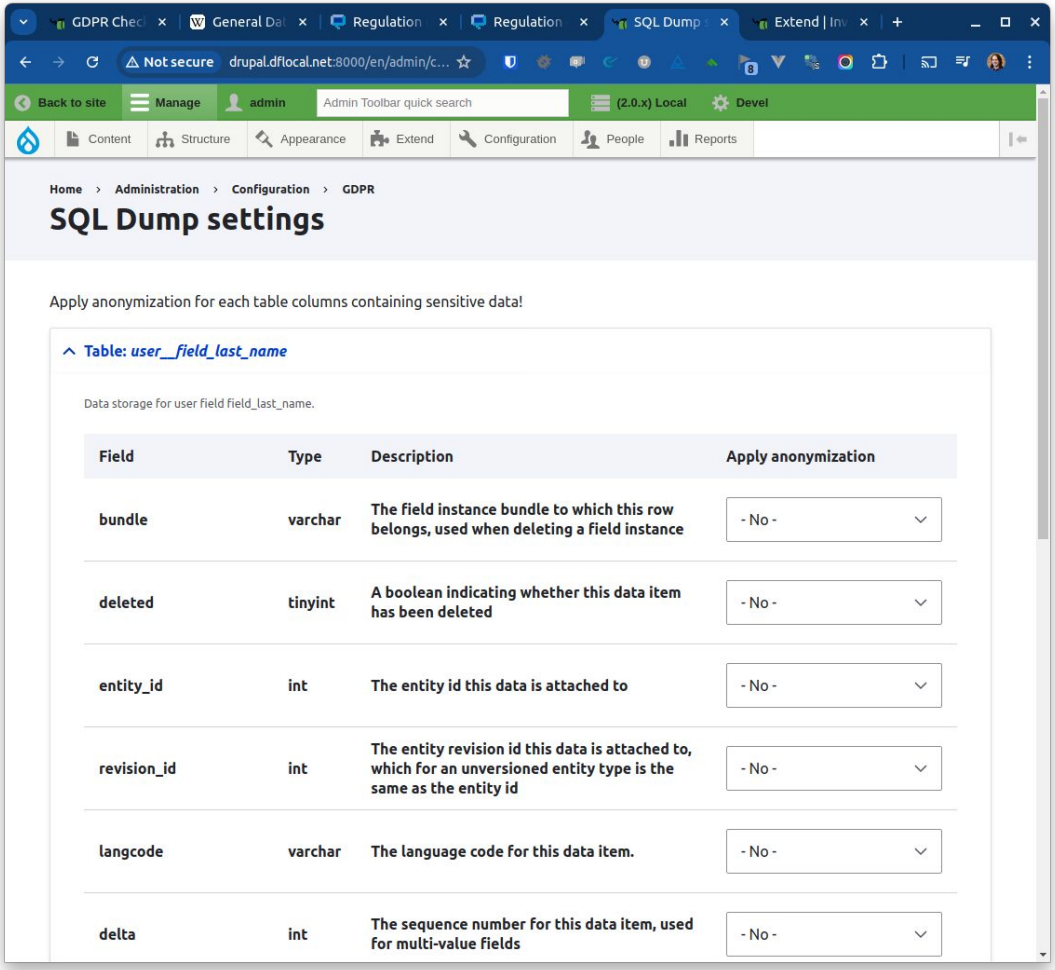
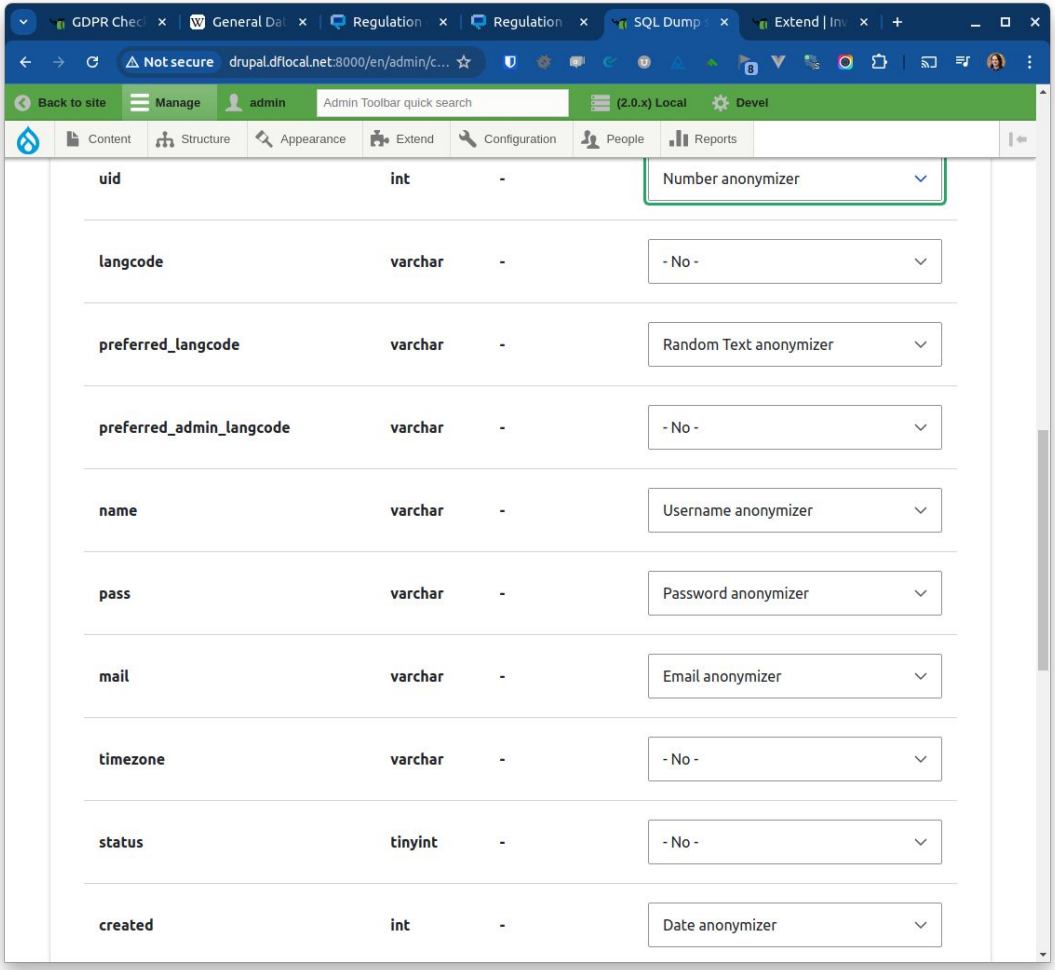


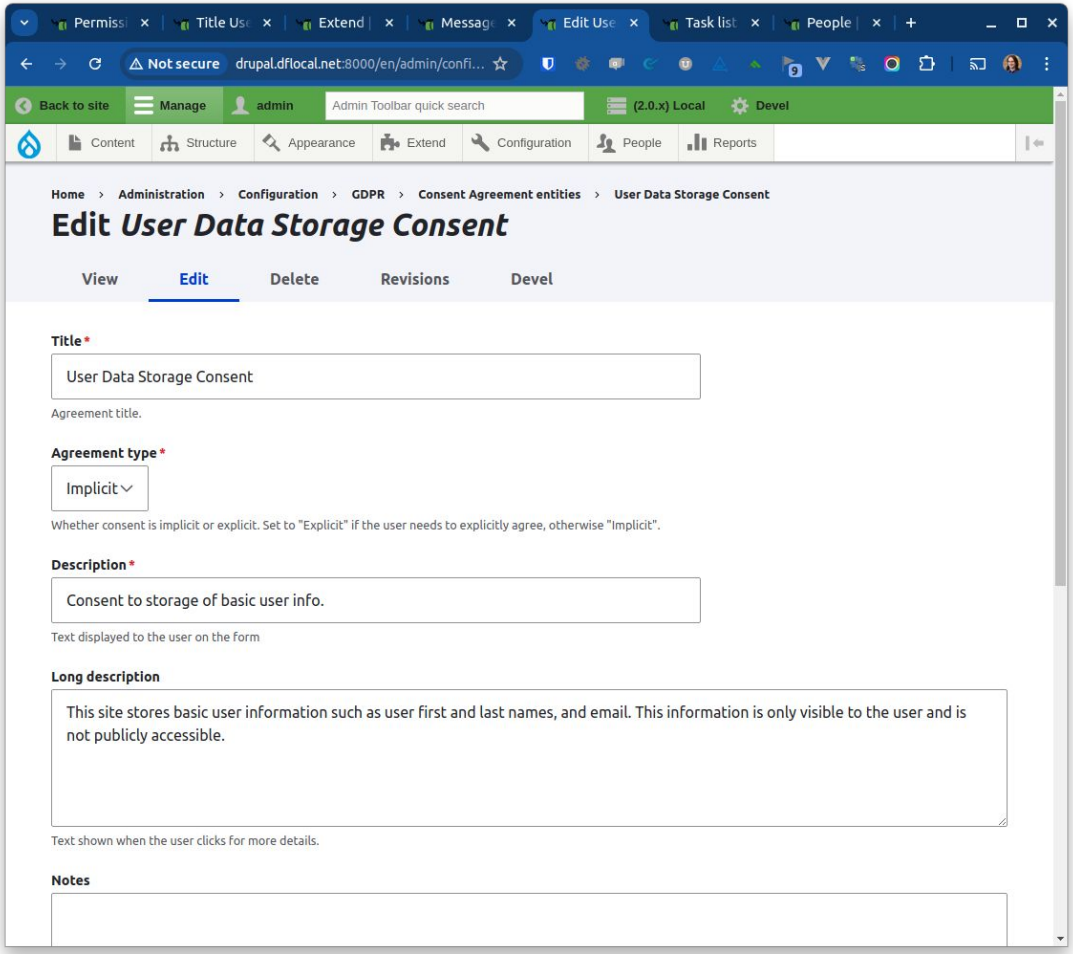
Coldfront Labs Inc.



Coldfront Labs Inc.



Coldfront Labs Inc.



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OTHER CONTRIB MODULES

- EU Cookie Compliance
  - https://www.drupal.org/project/eu_cookie_compliance
- Cookiebot
  - https://www.drupal.org/project/cookiebot
- General Data Protection Regulation Compliance
  - https://www.drupal.org/project/gdpr_compliance
- CookiePro (and CookiePro Plus)
  - https://www.drupal.org/project/cookiepro
  - https://www.drupal.org/project/cookiepro_plus

5.

Consent management & Cookies

CONSENT MANAGEMENT PLATFORMS

- Third-party organizations
- Provide cookie consent, management, banner, auto-blocking
- Paid & free solutions available

STEPS FOR INTEGRATING CONSENT MANAGEMENT

Scan

Categorize

Deploy

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Website Details

Completed

Publish | Publish Test | ...

Scan Results | Branding | Login Settings | Activity

Show 07/23/2024 01:56 PM

Scan Now | Export

Overview | Services | Cookies | Forms | Pages | Storage | Initiators

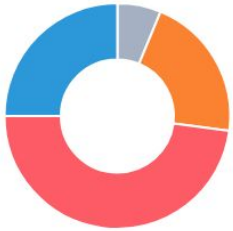
Vendor Services

What this means

Total	9
Targeting Cookies	3
Functional Cookies	4
Performance Cookies	2

New Cookies

What this means



Total	48
Unknown	3
Functional Cookies	10
Targeting Cookies	23
Performance Cookies	12

Forms

What this means

No Items to Display

Tags

What this means

Total	40
Fetch	2
Script	18
XHR	4
Image	8
Font	5
Stylesheet	3

COOKIE CATEGORIES

*see https://gdpr.eu/cookies/

Performance (Analytics)

Collect information about how users are interacting with the site. Usually aggregated/anonymized, used for evaluating site performance

Functional (Preference)

Not vital for a site to run, but are used to add additional functionality. Also used to track user site preference.

E.g. using user location to enhance certain parts of the site.

COOKIE CATEGORIES

*see https://gdpr.eu/cookies/

Marketing /advertising /targeting

Allow advertisers to track and model user data & behaviour for purposes of marketing and targeted advertising campaigns.

Strictly Necessary

Cookies that are necessary to provide the service, application, and other essential functionality of the site.

Categorizations

Cookies | Services | Tags | SDKs | Hosts | Categories

Language: English | Manage Languages | Add Cookie | Manage Not Found Cookies | ...

All Domains | Search...

Cookie Name	Source	Lifespan	Hostname	Default Category	Default Description	Domain
MUID	Scan	PERSISTENT	.bing.com	Targeting Cookies	This cookie is widely used my Microsoft as a ...	
MR	Scan	PERSISTENT	.c.bing.com	Targeting Cookies	This is a Microsoft MSN 1st party cookie whic...	
SRM_B	Scan	PERSISTENT	.c.bing.com	Targeting Cookies	This is a Microsoft MSN 1st party cookie that ...	
SM	Scan	PERSISTENT	.c.clarity.ms	Functional Cookies	This is a Microsoft MSN 1st party cookie whic...	
MR	Scan	PERSISTENT	.c.clarity.ms	Functional Cookies	This is a Microsoft MSN 1st party cookie whic...	
ANONCHK	Scan	PERSISTENT	.c.clarity.ms	Functional Cookies	This cookie carries out information about ho...	
MUID	Scan	PERSISTENT	.clarity.ms	Performance Cookies	This cookie is widely used my Microsoft as a ...	
NID	Scan	PERSISTENT	.google.com	Targeting Cookies	This domain is owned by Google Inc. Althoug...	
APISID	Scan	PERSISTENT	.google.com	Targeting Cookies	This DoubleClick cookie is generally set throu...	
HSID	Scan	PERSISTENT	.google.com	Targeting Cookies	This cookie is set by DoubleClick (which is ow...	
__Secure-1PAPISID	Scan	PERSISTENT	.google.com	Targeting Cookies		
__Secure-1PSID	Scan	PERSISTENT	.google.com	Targeting Cookies		

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FIRST-PARTY VS THIRD-PARTY COOKIES

First-party

Cookies that originate from the site itself. Only available for requests to the site domain.

Third-party

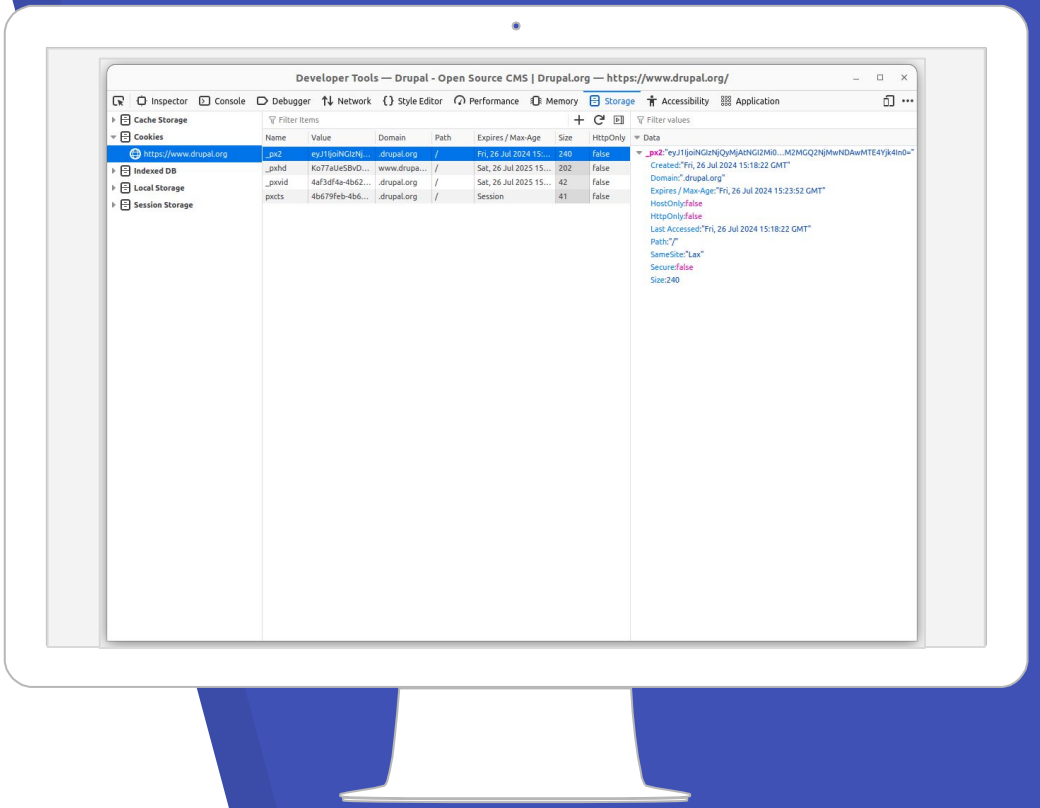
Originate from another (non-site) domain, available to any other site that includes cookies from that third-party domain.

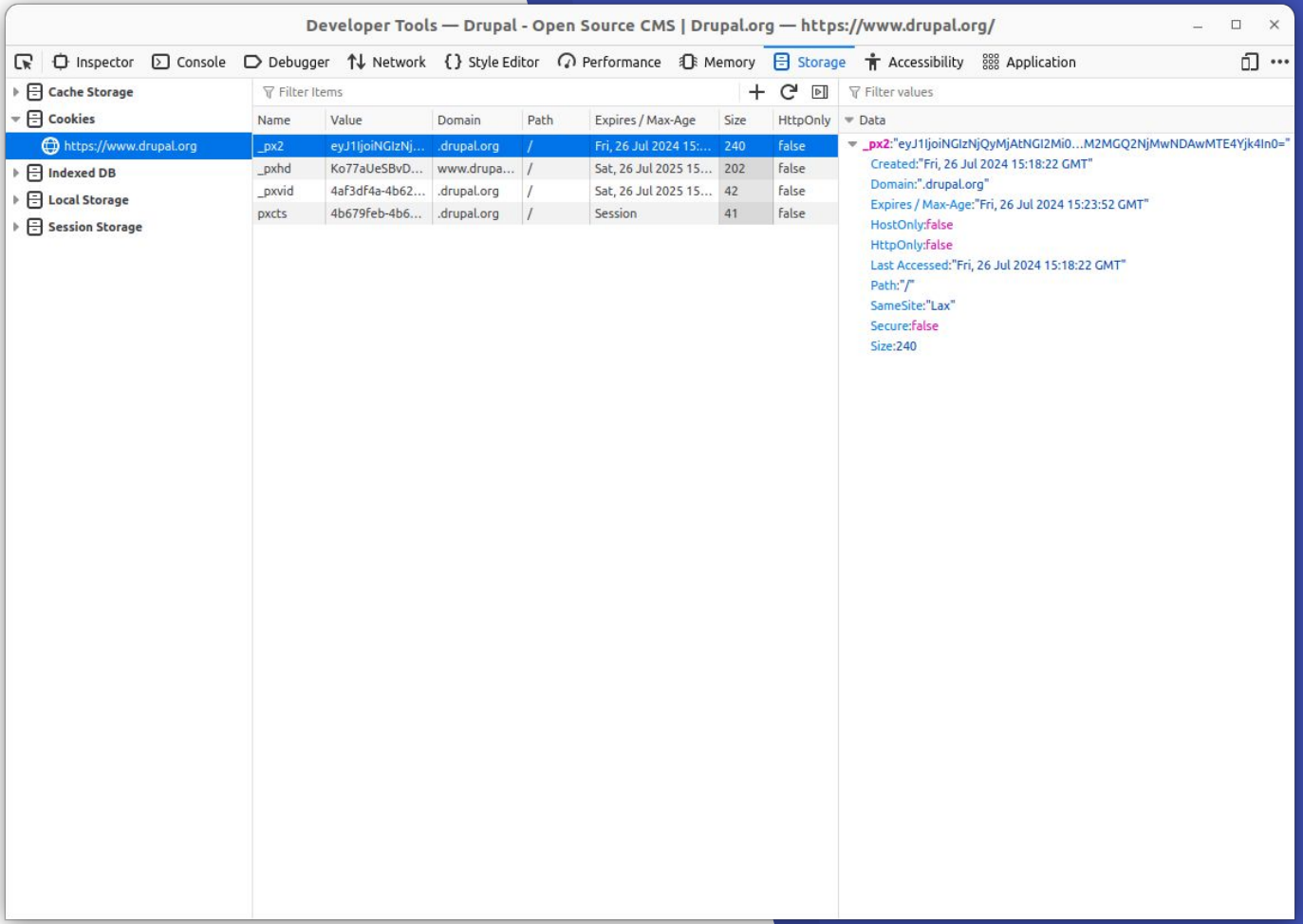
TIPS FOR DEVELOPERS

Bring the attention of your audience over a key concept using icons or illustrations

INSPECTING COOKIES

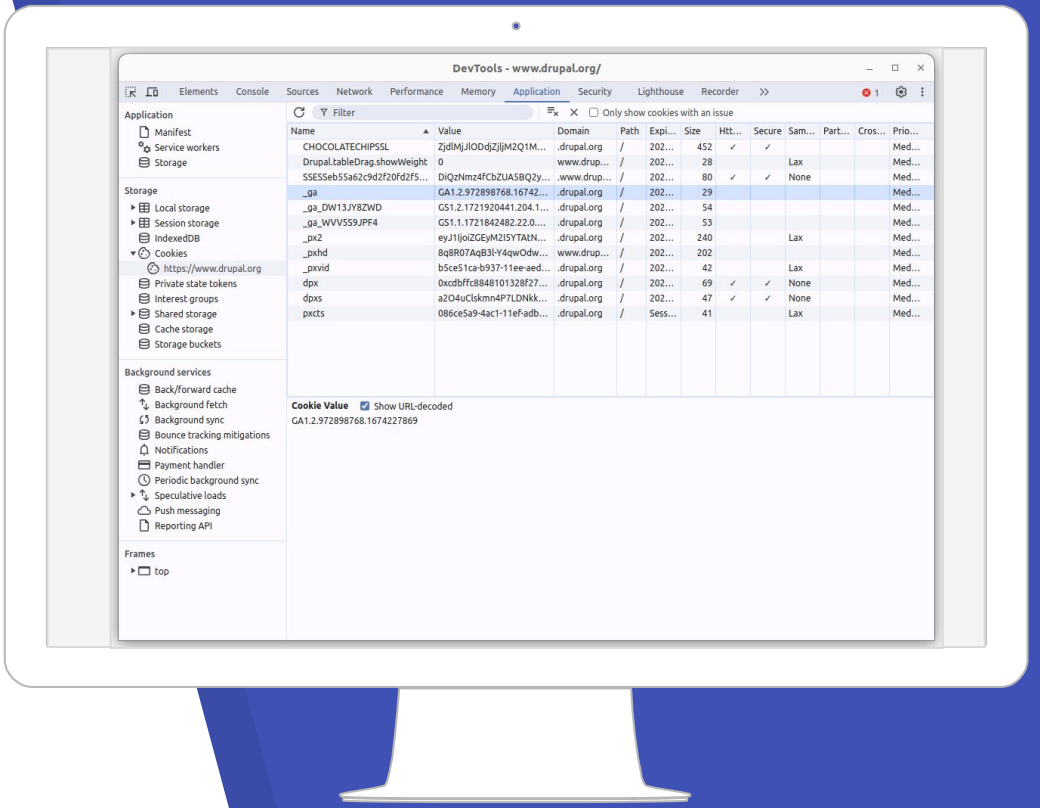
(Firefox) Developer tools allow you to inspect cookies.

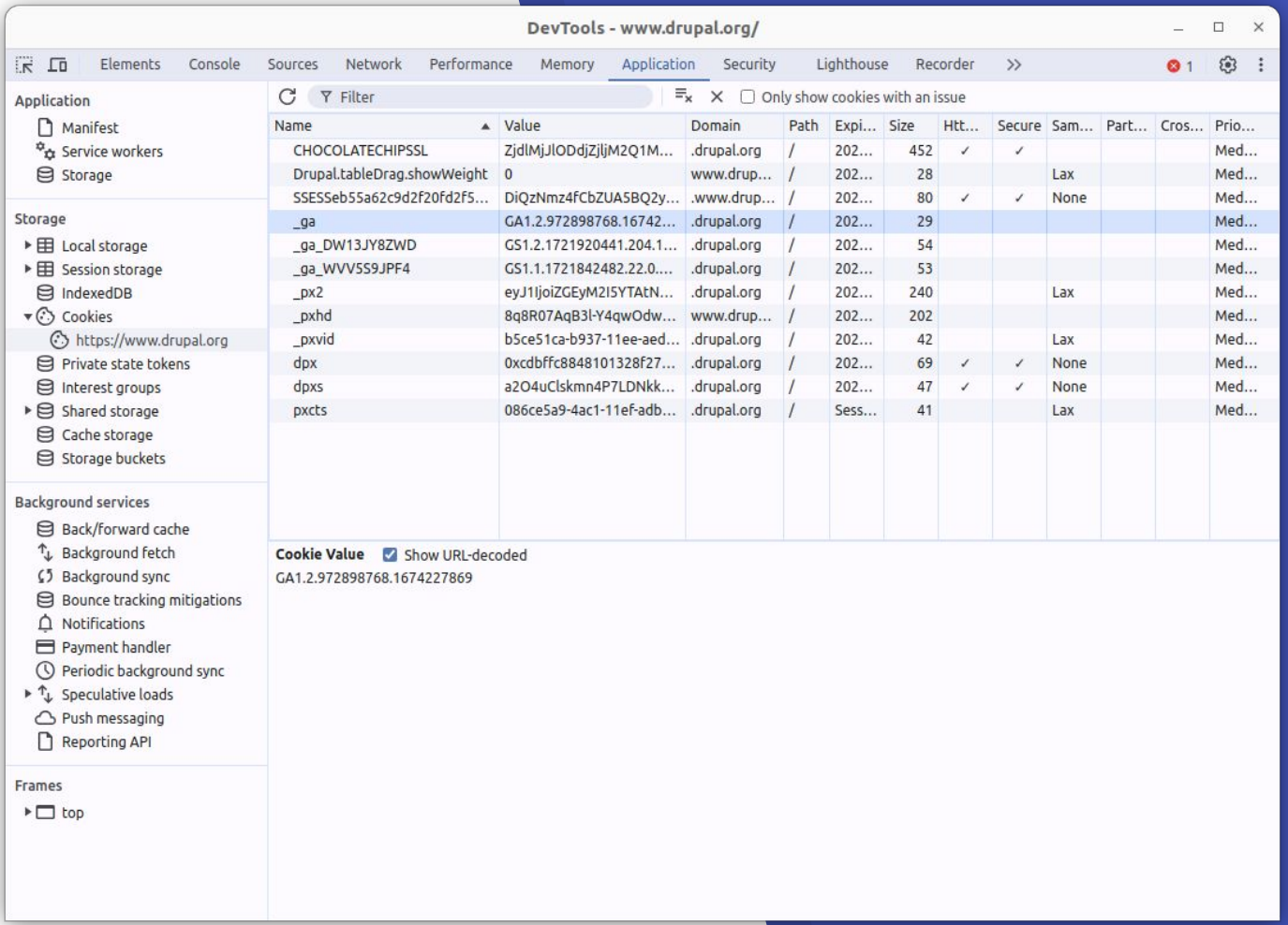



Developer Tools — Drupal - Open Source CMS | Drupal.org — https://www.drupal.org/
Inspector
Console
Debugger
Network
Style Editor
Performance
Memory
Storage
Accessibility
Application
Cache Storage
Cookies
https://www.drupal.org
Indexed DB
Local Storage
Session Storage
Filter Items
Name
Value
Domain
Path
Expires / Max-Age
Size
HttpOnly
_px2
eyJ1IjoiNGIzNj…
.drupal.org
/
Fri, 26 Jul 2024 15:…
240
false
_pxhd
Ko77aUeSBvD…
www.drupa…
/
Sat, 26 Jul 2025 15…
202
false
_pxvid
4af3df4a-4b62…
.drupal.org
/
Sat, 26 Jul 2025 15…
42
false
pxcts
4b679feb-4b6…
.drupal.org
/
Session
41
false
Filter values
Data
_px2:"eyJ1IjoiNGIzNjQyMjAtNGI2Mi0…M2MGQ2NjMwNDAwMTE4Yjk4In0="
Created:"Fri, 26 Jul 2024 15:18:22 GMT"
Domain:".drupal.org"
Expires / Max-Age:"Fri, 26 Jul 2024 15:23:52 GMT"
HostOnly:false
HttpOnly:false
Last Accessed:"Fri, 26 Jul 2024 15:18:22 GMT"
Path:"/"
SameSite:"Lax"
Secure:false
Size:240

INSPECTING COOKIES

(Chrome) Developer tools allow you to inspect cookies.




DevTools - www.drupal.org/
Elements
Console
Sources
Network
Performance
Memory
Application
Security
Lighthouse
Recorder
Application
Manifest
Service workers
Storage
Storage
Local storage
Session storage
IndexedDB
Cookies
https://www.drupal.org
Private state tokens
Interest groups
Shared storage
Cache storage
Storage buckets
Background services
Back/forward cache
Background fetch
Background sync
Bounce tracking mitigations
Notifications
Payment handler
Periodic background sync
Speculative loads
Push messaging
Reporting API
Frames
top
Filter
Only show cookies with an issue
Name
Value
Domain
Path
Expi...
Size
Htt...
Secure
Sam...
Part...
Cros...
Prio...
CHOCOLATECHIPSSL
ZjdlMjJlODdjZjljM2Q1M...
.drupal.org
/
202...
452
Med...
Drupal.tableDrag.showWeight
0
www.drup...
28
Lax
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GS1.1.1721842482.22.0....
53
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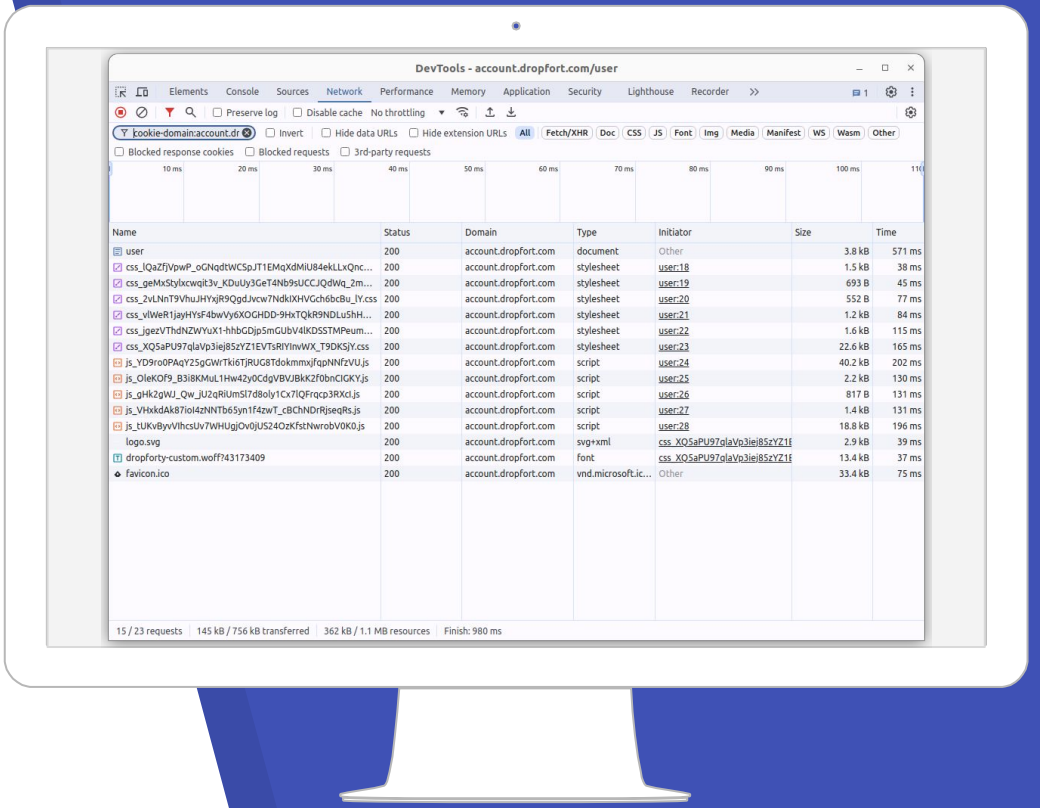
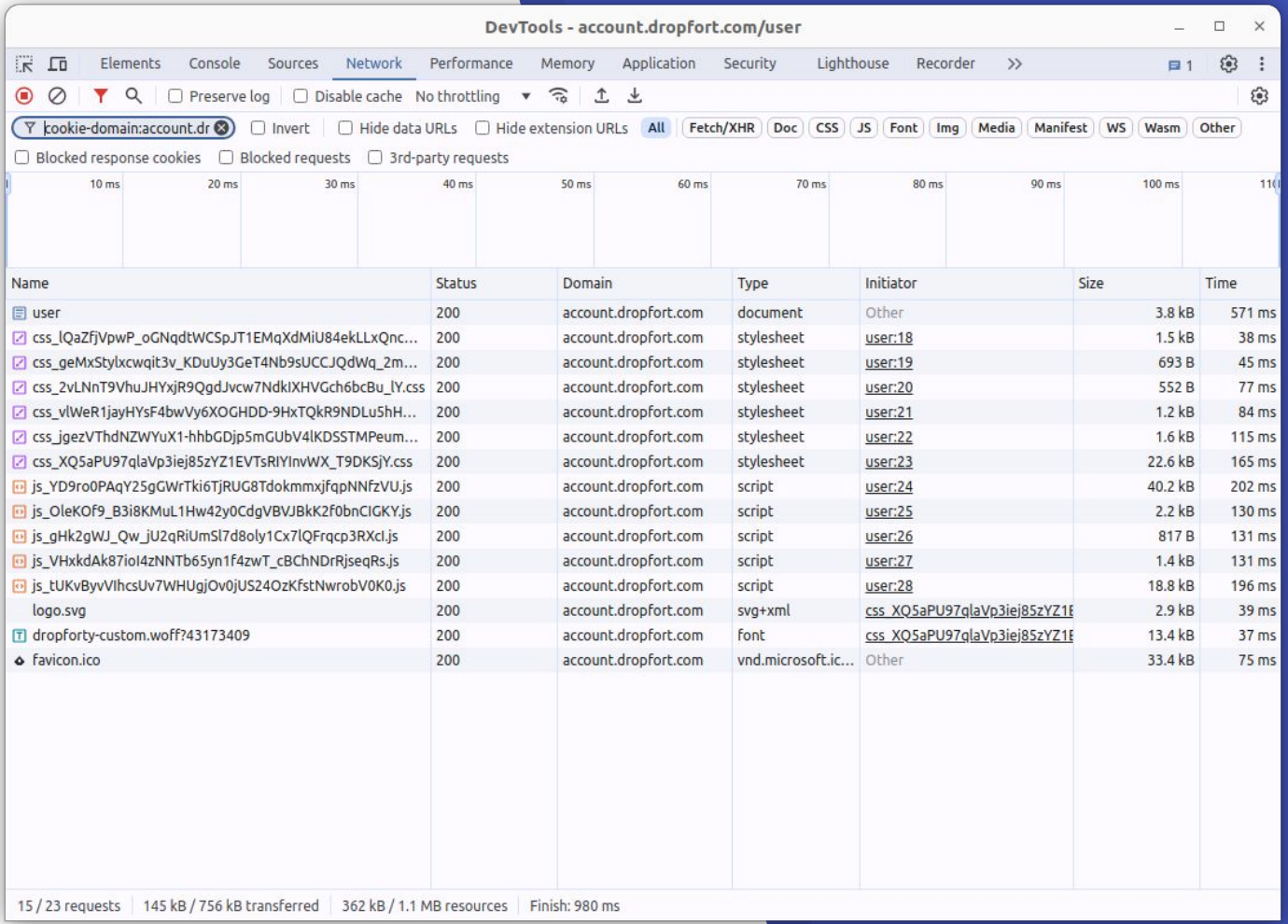
240
_pxhd
8q8R07AqB3l-Y4qwOdw...
www.drup...
202
_pxvid
b5ce51ca-b937-11ee-aed...
42
dpx
0xcdbffc8848101328f27...
69
None
dpxs
a2O4uClskmn4P7LDNkk...
47
pxcts
086ce5a9-4ac1-11ef-adb...
Sess...
Cookie Value
Show URL-decoded
GA1.2.972898768.1674227869

INSPECTING COOKIES (extra)

(Chrome) Select cookie, right-click -> Show Requests With This Cookie




DevTools - account.dropfort.com/user
Elements
Console
Sources
Network
Performance
Memory
Application
Security
Lighthouse
Recorder
Preserve log
Disable cache
No throttling
kookie-domain:account.dr
Invert
Hide data URLs
Hide extension URLs
All
Fetch/XHR
Doc
CSS
JS
Font
Img
Media
Manifest
WS
Wasm
Other
Blocked response cookies
Blocked requests
3rd-party requests
10 ms
20 ms
30 ms
40 ms
50 ms
60 ms
70 ms
80 ms
90 ms
100 ms
Name
Status
Domain
Type
Initiator
Size
Time
user 200 account.dropfort.com document Other 3.8 kB 571 ms
css_lQaZfjVpwP_oGNqdtWCSpJT1EMqXdMiU84ekLLxQnc... 200 account.dropfort.com stylesheet user:18 1.5 kB 38 ms
css_geMxStylxcwqit3v_KDuUy3GeT4Nb9sUCCJQdWq_2m... 200 account.dropfort.com stylesheet user:19 693 B 45 ms
css_2vLNnT9VhuJHYxjR9QgdJvcw7NdkIXHVGch6bcBu_lY.css 200 account.dropfort.com stylesheet user:20 552 B 77 ms
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css_jgezVThdNZWYuX1-hhbGDjp5mGUbV4lKDSSTMPeum... 200 account.dropfort.com stylesheet user:22 1.6 kB 115 ms
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js_tUKvByvVIhcsUv7WHUgjOv0jUS24OzKfstNwrobV0K0.js 200 account.dropfort.com script user:28 18.8 kB 196 ms
logo.svg 200 account.dropfort.com svg+xml css_XQ5aPU97qlaVp3iej85zYZ1E 2.9 kB 39 ms
dropforty-custom.woff?43173409 200 account.dropfort.com font css_XQ5aPU97qlaVp3iej85zYZ1E 13.4 kB 37 ms
favicon.ico 200 account.dropfort.com vnd.microsoft.ic... Other 33.4 kB 75 ms
15 / 23 requests
145 kB / 756 kB transferred
362 kB / 1.1 MB resources
Finish: 980 ms

THANKS!

Any questions?

You can find me at **drupal.org/u/classiccut** &
flemieux@coldfrontlabs.ca

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