GRANICUS

How to get your email subscription account ready for the GDPR.

Step-guide for getting the consent you may need from your subscribers.

Please be aware this document does not constitute legal advice.

It acts as a guideline for organisations using the GovDelivery Communications Cloud (by Granicus) who need to prepare their email subscription service for the General Data Protection Regulation (GDPR) that comes into effect on 25 May 2018.

You should consult your data protection officer for support or any clarification.

Please read through the whole
guide before you take any action.

A checklist you must complete first

Before you start planning your email campaigns to secure the GDPR-level consent you need from subscribers, you need to work through these considerations to make sure you know who you need to include in your GDPR "opt-in" email campaign.

1 **Talk to your data protection officer** about the GDPR, the new consent requirements, and how you've built your subscriber base so far. You must agree:
- Communications and initiatives which don't require explicit opt-in consent because they rely on another legal basis for processing email addresses
- Which communications require consent
- How consent is defined
- Which subscribers need to give new consent because proof of consent is currently missing / not obtained originally

2 **Decide which topics can be excluded** from your GDPR campaign. For example, some topics may be for internal communications only and serve to help staff do their jobs better.

3 **Decide if consent can be given at the account-level** or if certain topics or communication streams will need specific consent.

5 **Find out if your organisation has hard copies of proof of consent** for any uploaded subscribers. For example have you collected forms at events that prove subscribers consented to receive certain communications?

4 **Confirm with your data protection officer by when you want passive subscribers** (who do not respond to your opt-in campaign) to be removed from your account. Please note, Granicus' support team will need to do the final "clean-up" and delete any subscribers from your account for you. We will need 5-10 working days to complete this work (depending on demand) so please contact us in good time: help@granicus.com

You should only proceed with the following step-by-step guidance after reading it through in full, and after agreeing with your data protection officer that your organisation should undertake this work.

The following guidance applies to circumstances that are relying on "consent" as the lawful basis for collecting and processing personal data (including email address).

The recommendations in this guide apply to organisations who have decided that they need to secure new consent from some/all subscribers currently in their GovDelivery Communications Cloud account, in preparation for the GDPR.

What's in this guide?

1 SETTING GOALS AND OBJECTIVES

2 DEFINING THE TARGET AUDIENCE

3 DELIVERING THE RIGHT MESSAGING

4 TRACKING RESPONSES AND UPDATING THE TARGET AUDIENCE

5 THE FINAL CLEAN-UP OF YOUR ACCOUNT

6 WHAT YOU NEED TO DO BEFORE YOU START

PLEASE READ THIS GUIDE ALL THE WAY THROUGH BEFORE TAKING ANY ACTION DESCRIBED IN THIS SECTION

1

Setting goals and objectives

The purpose of a campaign in advance of the GDPR

Goal

Ensure your organisation's email communications service complies with the General Data Protection Regulation (GDPR) rules and guidelines.

Objectives

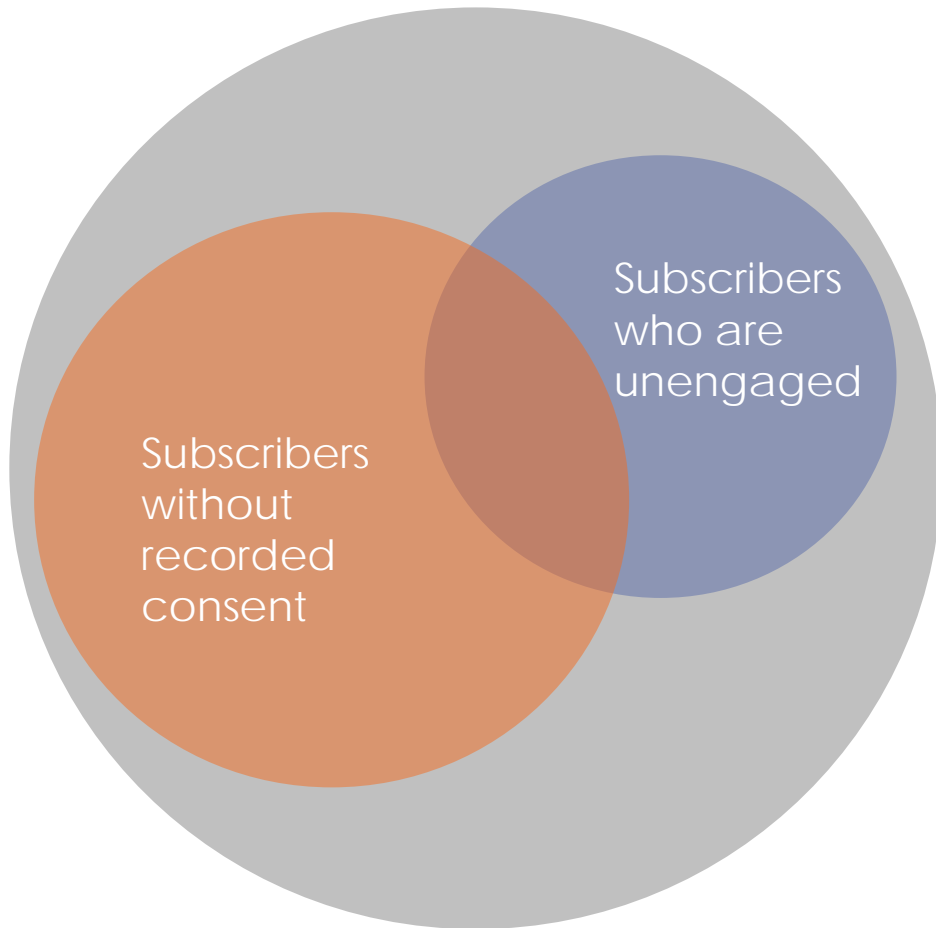|	
1	Identify subscribers who are un-engaged or who have not given explicit permission to receive emails from you where you're relying on "consent" as the legal basis for communicating.
2	Target identified subscribers with an opt-in campaign to obtain the necessary consent.
3	Remove subscribers who don't give consent to ensure all mailing lists are compliant with the GDPR by 25 May 2018.

2

Defining the target audience

The subscribers you need to target

Subscriber universe

Subscribers who are unengaged

Subscribers without recorded consent

✓ **Recorded consent is mandatory under GDPR.**
When you look at a subscriber record in the GovDelivery Communications Cloud, you'll see a timestamp and source information showing how and when each person subscribed – in most cases this is sufficient proof of their consent to receive your communications. For example, "Source = Direct" means they subscribed themselves online via your sign-up link. If you don't have proof of consent outside of the Communications Cloud (for example a paper form collected at an event) for uploaded subscribers (Source = Upload), you will need to ask these people for their consent.

✓ **GDPR dictates that you cannot hold on to data that you are not using.**
Unengaged subscribers will need to be re-engaged or removed by 25 May 2018. This cohort includes subscribers who are not subscribed to any topics, subscribers who have never opened or clicked in an email, and subscribers who have not engaged with an email in a while. Your organisation should decide on the length of inactivity that constitutes an unengaged subscriber. For info, some of our clients have deemed a subscriber unengaged after between 6 and 12 months of no activity.

Who will your audience be for this campaign?

We recommend you identify all subscribers that fall into these three categories and create one new "restricted" topic to house them all in. For simplicity, you should target them all at the same time with the same message asking for them to confirm they still want to receive updates from your organisation. Your call-to-action can then direct recipients to the subscription centre to edit their preferences (if they want to). Here's how to get started:

1
Zero-Topic

- **Definition**: Subscribers who are not subscribed to any topics.

- **Goal**: Send subscribers to email topic tree (subscription centre) to select and submit their preferences.

- **Recommended call-to-action**: *Yes, I want email updates >*

2
Uploads

- **Definition**: Uploaded subscribers with no recorded consent.

- **Goal**: Click to give consent.

- **Recommended call-to-action**: *Yes, I want email updates >*

3
Unengaged

- **Definition**: Subscribers with recorded consent who have not engaged (opened / clicked) in the last X* months or never engaged.

- **Goal**: Click to give consent.

- **Recommended call-to-action**: *Yes, I want email updates >*

* Your organisation should decide the period of inactivity that makes someone "unengaged". The GDPR doesn't state a specific timeframe.

How to identify the subscribers you need to target

How to identify **zero-topic** subscribers

You will need to export a list of all subscribers in your GovDelivery Communications Cloud account and sort the CSV file to pull a list of zero-topic subscribers. Here's how:

1 Log into your GovDelivery Communications Cloud account and click on "Subscribers" from the left-hand menu.

2 Click the "CSV (ALL)" button on the right (if you have more than 10k subscribers, you will receive an email with a download link within a few minutes).

3 Open the CSV and select everything in the worksheet (top left corner button)

4 Go to "Sort & Filter" on the top ribbon, then click "Custom Sort".

5 Sort by "Subscriptions" > "Values" > "Smallest to largest", then select "OK".

6 The records in your CSV file will now be arranged in order from "0" subscriptions and upwards. Delete all rows with one or more subscriptions (column B).

You will now be left with a list of all zero-topic subscribers. Save this CSV file (e.g. as "Zero Topic Subscribers Today's Date"); you will need to collate this list with your list of uploaded and unengaged subscribers in a moment.

How to identify **uploaded** subscribers

You will need to export a list of all subscribers in your GovDelivery Communications Cloud account and sort the CSV file to pull a list of uploaded subscribers. Here's how:

1 Log into your GovDelivery Communications Cloud account and click on "Subscribers" from the left-hand menu.

2 Click the "CSV (ALL)" button on the right (if you have more than 10k subscribers, you will receive an email with a download link within a few minutes).

3 Open the CSV and select all in the worksheet (top left corner)

4 Go to "Sort & Filter" on the top ribbon, then click "Custom Sort".

5 Sort by "Origin" > "Values" > "Z to A", then select "OK".

4 Your uploaded subscribers will appear at the top of the CSV. Remove all subscribers with an origin other than "Upload" (column C).

Please note you may also want to remove staff email addresses if they have been uploaded under another legal basis for communicating.

You will now be left with a list of all uploaded subscribers. Save this CSV file (e.g as "Uploaded Subscribers Today's Date"); you will need to collate this list with your list of zero-topic and unengaged subscribers in a moment.

How to identify **unengaged** subscribers

You will need to request a list of your unengaged subscribers via help@granicus.com

GDPR doesn't specify what timeframe of inactivity constitutes an "unengaged" subscriber. You will need to decide on your desired timeframe and criteria with your data protection officer, then let us know the data you'd like us to pull.

For info, some of our other clients have elected to include the following subscribers in their "unengaged" segment: **anyone who subscribed more than three months ago AND hasn't clicked in an email OR opened an email for more than six months.**

Next, consolidate the data from all three CSV files into one file so you have one list of:

Zero-topic subscribers
Uploaded subscribers
Unengaged subscribers

-        Put all the data into one worksheet.

-        Remove all columns except "email address".

Now you have your list of subscribers you need to seek consent from, create a new topic in your Communications Cloud account and upload your CSV file to the new topic's subscriber list.

- Name the topic "GDPR opt-in campaign" (or similar)

- Change the visibility to "Restricted"

Please click here for further guidance on uploading CSVs to your topic.
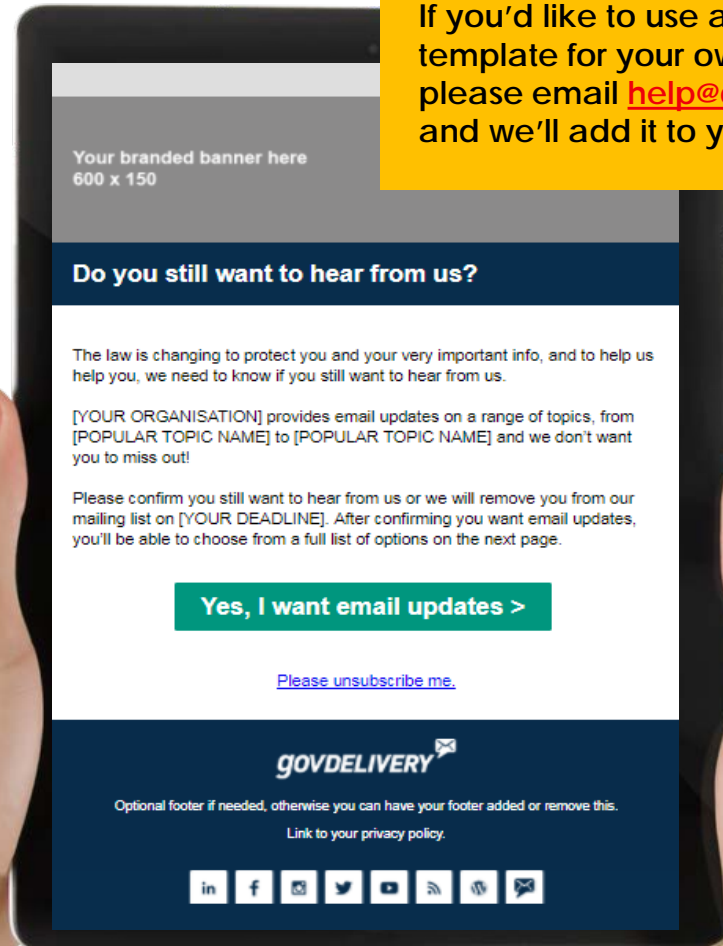
3

Delivering the right messaging

An approach to drive opt-in consent

If you'd like to use and adapt this template for your own emails, please email help@granicus.com and we'll add it to your account.
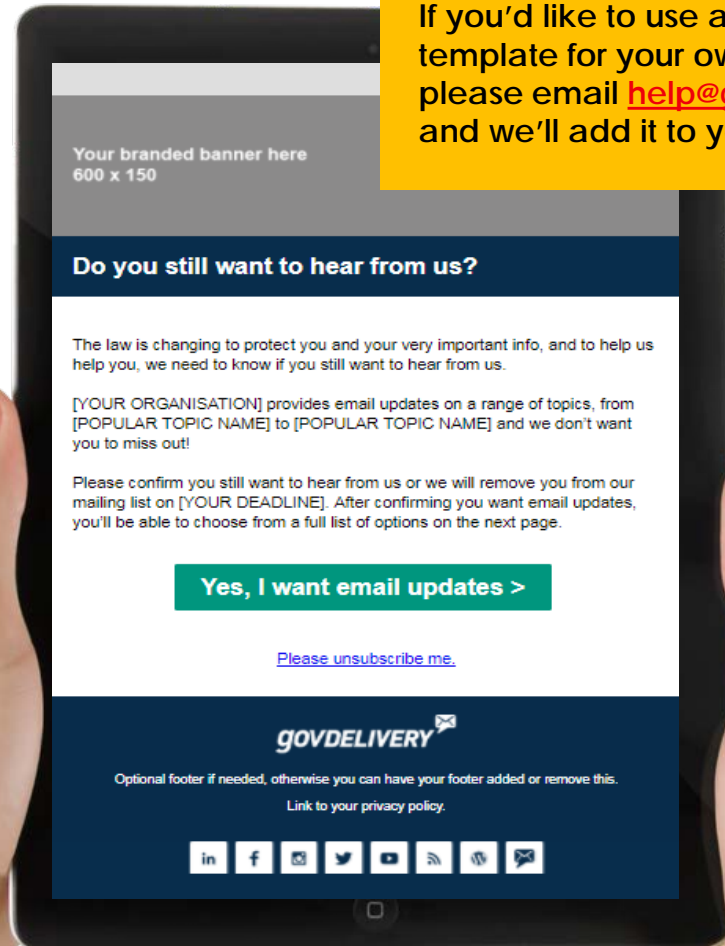
Your messaging should follow best practices for **an opt-in re-engagement campaign.**

- ✓ **Emphasise the value** of engaging with your communications. Spell out how the recipient will benefit from the information and opportunities on offer.

- ✓ **Keep it simple** to make it easy for recipients to understand what they need to do and take the action. Use a clean layout to draw attention to the call-to-action button.

- ✓ **Inspire a sense of urgency** to encourage action and fight procrastination.

- ✓ **Send multiple emails** to increase your chance of engaging users who have not yet responded due to cluttered inboxes or temporary apathy.

Your call-to-action button must express "Yes"

If you'd like to use and adapt this template for your own emails, please email help@granicus.com and we'll add it to your account.

Your branded banner here
600 x 150

Do you still want to hear from us?

The law is changing to protect you and your very important info, and to help us help you, we need to know if you still want to hear from us.

[YOUR ORGANISATION] provides email updates on a range of topics, from [POPULAR TOPIC NAME] to [POPULAR TOPIC NAME] and we don't want you to miss out!

Please confirm you still want to hear from us or we will remove you from our mailing list on [YOUR DEADLINE]. After confirming you want email updates, you'll be able to choose from a full list of options on the next page.

Yes, I want email updates >

Please unsubscribe me.

govDELIVERY

Optional footer if needed, otherwise you can have your footer added or remove this.

Link to your privacy policy.

> To avoid any ambiguity, your call-to-action button must indicate a subscriber's decision to stay on your mailing list.

The language you use must indicate a "yes" decision; so that a click on the button is affirmation that a subscriber still wants to hear from you.

Do not use "Choose preferences" or "Edit my updates" since these do not represent a decision to stay.

The approach we're recommending works on the basis that any subscriber clicking your call-to-action button, "Yes, I want email updates >", is giving their consent.

General messaging guidelines

Each recipient should receive a 3-5 message email series directing them to take the necessary action to opt in.

Messages should be spaced approximately 1 week apart to avoid overwhelming subscribers (move to a shorter cadence as 25 May draws closer).

A/B test your messages (try out different messaging, subject lines, pre-headers, imagery and calls-to-action to increase conversion rates).

Your email plan for seeking consent from subscribers in your new topic

Email	Audience	Content	Consent mechanism	Where should the call-to-action button go?
1	All subscribers you need to secure new consent from (in your new topic)	Emphasise the value of your communications	Click on a button to give consent*	Take people to their subscriber preferences
2	Subscribers in your topic who didn't click to give consent in email 1	Remind subscribers they must act to continue receiving valuable communications from your organisation	Click on a button to give consent*	As above
3	Subscribers in your topic who didn't click to give consent in email 1 or 2	Warn subscribers that this is their last chance and they must click to continue receiving your communications	Click on a button to give consent*	As above

* It's possible that some of the zero-topic subscribers you're targeting in your new list will click the call-to-action button but not actually select the updates they want to receive in the subscription centre. You could retarget them with a bespoke message asking them to update their preferences. If by 25 May 2018 they still aren't subscribed to anything, they'll show up in the final zero-topic subscriber report we'll run for you and we'll delete them with your permission.

Tips for your email content

Tip 1	Only include one call-to-action in each message and make sure you use a button that stands out. Use clear language such as: *"Yes, I still want to receive emails >"*, *"I want updates, show me the full list >"*, *"Yes, keep me subscribed >"*, *"I want [YOUR ORG] updates >"*.
Tip 2	Hyperlink your call-to-action button to subscribers' preferences so any zero-topic subscribers on your list will be able to view the full range of email options on offer and opt in to topics, as will other subscribers. Please see the next slide for how to do this.
Tip 3	Your subject line and pre-header text are likely to have the biggest influence on a recipient's decision to open your email. Make them clear, short and punchy and don't forget to A/B test!
Tip 4	You could create a sense of urgency by telling recipients they're going to be removed in X days (or on 25 May 2018). Frontload your pre-header text (visible in most inboxes underneath the subject line) with key deadlines to help increase opens.

Most important tip for your email

You must hyperlink your call-to-action button to the subscription centre:

Recipients who click will be able to view their preferences and full range of email options on offer. If you have the time and resources, you may want to consider sending people who click your button to a confirmation landing page instead, thanking them for their response. However, in the interests of time and the need to serve three audiences (zero-topic, uploaded and unengaged) with one message, we recommend keeping it simple and hyperlinking to the subscription centre. You have two options for the subscription centre:

1) Insert this macro text into the hyperlink field for your button (it will take people to their current subscriber preferences only, the full list on offer will be another click away): **[[SUBSCRIBER_PREFERENCES_URL]]**

2) Go to "Account Settings" > "Quick Subscribe" page (right hand side menu) > Click "Complete quick subscribe page" > Then copy and paste the URL into your call-to-action button hyperlink to take people to the full list of options available in the subscription centre.

You must remove any other link to the subscription centre from your email, including the footer. This will avoid any confusion when you analyse the Bulletin Links report (more on that in a moment). You will know for sure that any clicks on the link to the subscription centre will be as a result of subscribers clicking your call-to-action button: "Yes, I want emails >".

You must ensure your call-to-action button's hyperlink is the only instance of this link in your email.

A/B test to improve results

We recommend you A/B test email variables to determine what resonates best with your audience and drives the highest open and click rates. Here are some suggestions:

- **Subject line** – "We miss you" vs "[YOUR ORGANISATION] misses you"

- **Email send time** – Morning vs evening, weekday vs weekend

- **Deadline inclusion** – "Tell us what you want" vs "Tell us what you want by 25 May"

- **GDPR mention** – "We need your permission" vs "GDPR requires us to obtain your permission"

- **Call-to-action button** – "Keep sending me email updates" vs "Yes, I want your emails"

4

Tracking responses and updating the target audience

How to target the right people for "email 2" and beyond

For your second, third and any subsequent emails (asking subscribers to give consent), you will need to make sure you only email people who haven't given consent yet. To do this, you need to use the "Questions" feature in Communications Cloud to keep a record of subscribers who do click your call-to-action button - to give consent - in previous emails, and in which email. You'll then be able to filter them out of your next emails requesting consent.

The next slides will explain how to find out who clicked your call-to-action button in a previous email, "*Yes, I want email updates >*"; these are the people you will need to exclude from subsequent emails. You'll learn how to set up two (private) questions in your account for you to use to track when someone clicks to give consent:

- **Question 1 = "GDPR consent?"**
You'll learn how to add a "Yes" response against each subscriber in your topic list who clicks your call-to-action button, "*Yes, I want email updates >*", giving their consent.

- **Question 2 = "GDPR consent email send date"**
You'll learn how to add a response to this question to record the send date of the email in which someone clicked to give consent.

The goal is to be able to target only people who haven't yet given consent in your topic list. You'll do this by selecting to only send to subscribers who have given "No response" against the question, "GDPR consent?", meaning that they haven't clicked "*Yes, I want email updates >*" yet.

How to target the right people for "email 2" and beyond – setting up Questions

Setting up Question 1: "GDPR consent?", to record when a subscriber has clicked your call-to-action button to give consent:

1. In Communications Cloud, click "Questions" (left-hand menu)
2. Click "Create question" and name it: "GDPR consent?"
3. Apply these settings:

    - Question text: "GDPR consent?"

    - Question type: "Select one"

    - Publicly visible: "No"

    - Leave other options as default

4. Click "Save"
5. Add one answer option only: "Yes"
6. Click "Save"

How to target the right people for "email 2" and beyond – setting up Questions

Setting up Question 2: "GDPR consent email send date", to record the send date of the email in which someone clicks to give consent:

1. In Communications Cloud, click "Questions" (left-hand menu)

2. Click "Create question" and name it: "GDPR consent email send"

3. Apply these settings:

    - Question text: "GDPR consent email send"

    - Question type: "Free response"

    - Publicly visible: "No"

    - Leave other options as default

4. Click "Save"

How to target the right people for "email 2" and beyond – recording "Yes" responses for consent

When you're ready to send your next GDPR opt-in email, log into your Communications Cloud account:

1. Click "Reports" (left-hand menu)
2. Click "Bulletin Links" report
3. Select the date range your first GDPR opt-in email was sent
4. Click "Details"
5. Scroll down and click on the specific link you assigned to your call-to-action button in your GDPR opt-in email. *Tip: Our suggestion was to hyperlink a button called "Yes, I want email updates >" to the subscription centre. The link is likely to look like this:*

   https://public.govdelivery.com/accounts/YOURORG/subscriber/edit?preferences

6. Click "CSV" to download the report of subscribers who clicked this link (your file will download straight away or be emailed to you if it contains over 10k records)
7. Save this file on your computer as "GDPR Email 1 – Yes Responses" (or similar)

How to target the right people for "email 2" and beyond – recording "Yes" responses for consent

8. In your CSV file, "GDPR Email 1 - Yes Responses", delete all other columns except the column of email addresses under "Destination".

9. Add in two new columns: one called "GDPR consent?" (the text must match the name you used for Question 1 in Communications Cloud exactly – it is case sensitive), and name your second column "GDPR consent email send date" (using exactly the same text you used for Question 2 – it is case sensitive).

10. For each email address in your CSV add "Yes" in the column called "GDPR consent?". You must type "Yes" in exactly the same way as written for the answer you set up in Communications Cloud – it is case sensitive.

11. In the column, "GDPR consent email send date", add the date you sent the email in which the subscriber clicked your call-to-action button to confirm their consent. For example, if the bulletin links report you pulled was for your first GDPR opt-in email sent on 2 May 2018, type "2 May 2018" into the column called "GDPR consent email send date" for each subscriber in the CSV.

12. Save your CSV.

For more guidance on CSVs and compatibility, please <u>follow the steps here.</u>

How to target the right people for "email 2" and beyond – recording "Yes" responses for consent

To tell Communications Cloud who to exclude from subsequent sends, you need to upload your CSV file to your new topic's subscriber list so that "Yes" answers for Question 1 ("GDPR consent?") are mapped to the subscriber records of those people who have given consent via a previous email. Uploading this CSV will also mean there is a record in Communications Cloud of the send date of the email in which a subscriber gave consent.

1. Go to "Topics" (left-hand side) and open your new topic (we suggested you call it "GDPR opt-in campaign")

2. Click "Subscribers" on the right-hand menu

3. Scroll down to "Upload subscriber list"

4. Select your CSV file, "GDPR Email 1 – Yes Responses"

5. Click "Save" at bottom of the page

You now have a criteria to use for your next send, whereby you can include only people who have given "No response" to the question, "GDPR-compliant?", thus excluding any "Yes" responses.

How to target the right people for "email 2" and beyond – setting up the next email send

Here's how to send your second email to the right people, by only sending to anyone on the list who hasn't yet clicked to give consent (i.e. excluding anyone with a "Yes" to the "GDPR consent?" question you set up). People who aren't tagged with a "Yes" in your topic are automatically put into a cohort of subscribers that have given "No response" – your target audience:

1. Go to "Bulletins" on the left-hand menu

2. Click "Create advanced bulletin"

3. Select a template (please note we have created a simple template – see page 19 - for you to use and adapt for this campaign – please email help@granicus.com if you'd like us to add it to your account)

4. Create your email

5. In the "Audience" section, select your "GDPR opt-in campaign" topic

6. Click "Apply criteria"

7. Select "GDPR consent?"

8. Click in the field that appears and select "No response" in the "is any of:" field

9. Scroll to the top of the page and click "Save and next"

For email 3 and subsequent GDPR opt-in emails, you will need to refollow the steps outlined in slides 31-34, prior to deploying each email.

I.e. just before your next send, you will need to export a CSV file of the "Bulletin Links" report for the previous email. This will give you a list of subscribers who clicked on the call-to-action button to give their consent.

In the CSV don't forget to add the two question columns "GDPR consent?" and "GDPR consent email send date". Add "Yes" in the column called "GDPR consent?", and the send date of the previous email (in which consent was given) in the "GDPR consent email send date" column. Then upload that CSV to your topic. NB: the CSV doesn't override the subscriber list in Communications Cloud, it simply tags the subscriber records with the right answers to the two questions.

This process will ensure the list of people with an answer "Yes" against the question, "GDPR consent?", will be up-to-date and ready to be excluded from your next and all subsequent sends which use this question as an audience criteria filter.

5

The final clean-up of your account

Removing people who still haven't given consent at the end of your campaign

At the end of your email series you will need Granicus' Support team to remove all subscribers from your account who still haven't clicked to give consent or who still haven't subscribed to anything (zero-topic subscribers). **Please note we will require 5-10 working days to complete this data removal work in your account (depending on demand),** so please give us enough notice before your own "deadline". If the expected completion date is after 25 May 2018, you may want to pause any email sends until you have received confirmation that the data has been removed.

When you decide the opportunity to give consent is over, please email help@granicus.com the following instructions:

Hi Granicus,

[YOUR ORGANISATION] has completed its GDPR opt-in campaign and we are now ready for you to do the final clean-up of our account. We would like our account to be ready by [YOUR DEADLINE].

Please remove any remaining zero-topic subscribers in our account AND subscribers in the topic called "GDPR opt-in campaign" who didn't respond to our call-to-action to give consent. *For this topic's subscriber list we tracked consent using the Question: "GDPR consent?", answer "Yes". We successfully obtained consent from some subscribers in this topic and this is tracked with an answer "Yes" to that Question against subscribers' record. Please keep these subscribers who gave consent in our account.* ***The subscribers who we need your help to remove will not have responded to this question***. *Please remove these subscribers from our account entirely.*

Please note there will be some zero-topic subscribers who are marked as "Yes" but didn't select any subscriptions. Please do the account-wide zero-topic removal last to ensure these people are also removed.

Thanks, [YOUR NAME]

6

What you need to
do before you start

Ready to start your GDPR opt-in campaign? Here's what you need to do now:

If you would like to follow these guidelines for your GDPR opt-in email series, please email **help@granicus.com** to request:

1. **A list of unengaged subscribers in your account** *Please specify in your email the period of inactivity your organisation is classing as "unengaged". While we can't provide legal guidance on this decision, some of our clients have decided to target anyone who hasn't opened or clicked an email in at least six months AND who subscribed more than three months ago as "unengaged".*

2. **Access to the GDPR email template we've suggested** (see slide 19), if you would like to use/adapt it for your organisation's email series. Please ask for this asap since we will need a few working days' notice to build this in your account.

3. **Help from our Support team to remove any subscribers from your account who still haven't given consent or who haven't subscribed to anything** after the campaign period. *Your organisation must let us know by when you want said subscribers to be deleted from your account following the final email in your opt-in series.* **Please note we will need 5-10 working days to complete this data removal work (depending on demand) so please leave enough time between your final send (and your request to us) and your deadline for this work to take place, thank you.**

Thanks for your attention.
We hope this guide helps
you prepare for the GDPR.
Good luck!

Please email **help@granicus.com**
if you have further questions or
get stuck.