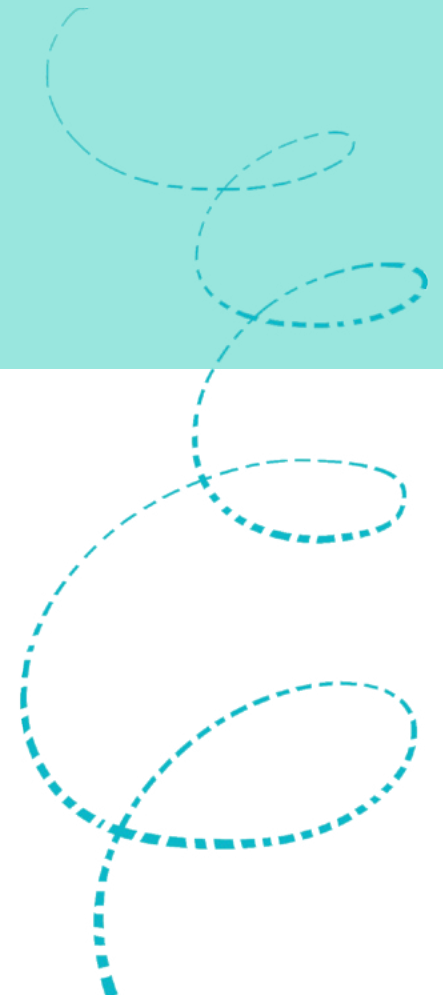




# CASE STUDY

## GDPR COMPLIANCE AT PEOPLEDOC



## Introduction

By now, you're likely familiar with the General Data Protection Regulation (GDPR) and what it means for HR. GDPR may seem overwhelming, but rest assured you're not alone—even PeopleDoc needs to comply! With over 200 employees spread across 8 countries, there were many new policies, practices and programs we had to implement to ensure compliance.

On the following pages are some of the actions we took to prepare for GDPR and which tools are helping us along the way. We hope this helps guide your own journey to GDPR compliance.

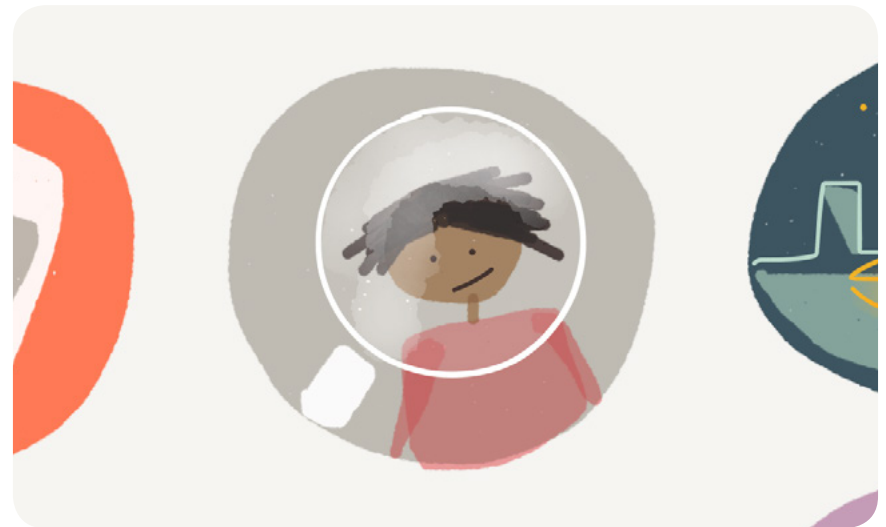


## Transparency

**What the GDPR requires:** Under the GDPR, individuals must be informed of how their personal data will be used as well as their rights around their data.

**What we did to comply:** We developed an **Employee Data Privacy Policy**, which outlines the categories of data HR can collect, how HR is permitted to use that data, the employees' right to access or modify their data, as well their right to restrict the use or request the deletion of their data.

**How technology helps:** The Employee Data Privacy Policy was easily sent to all current employees through the PeopleDoc portal for acknowledgement.





Rather than a set of restrictive constraints, the GDPR should be perceived as an opportunity for HR to optimize data management processes as well as enhance the employer brand for their company.

Arnaud Gouachon, Chief Legal and Compliance Officer, PeopleDoc

## Minimization

**What the GDPR requires:** The minimization principle ensures that only data with a specific purpose is collected. For HR, this typically means information related to an employee's identity or payroll data. If it's not used regularly for day-to-day HR management, you're best off *not* requesting it. For example, it's likely unnecessary to collect candidates' social security numbers before they're hired. This will create more work later on because, if the candidate isn't brought onboard, this data will need to be deleted or anonymized.

**What we did to comply:** GDPR is more than a compliance issue, it's a company-wide shift in the way we approach our work. PeopleDoc has created a culture around minimization. "The idea is to think about privacy from the beginning. If you're starting a new project, think about the data you'll need to have, whether it's really needed and what security measures you'll need to put in place," says Fernanda Goncalves, Data Privacy & Compliance Manager at PeopleDoc.

**How technology helps:** Before the days of digital documents, requesting additional information from an employee was a cumbersome back-and-forth process. To prevent extra work, HR would collect all the data they might potentially need upfront so they could have it all on file—just in case.

Today, it's easy to have employees submit new data as needed (especially with **PeopleDoc's HR Service Delivery platform**). For example, you may need a copy of an employee's passport when he or she has to travel abroad, but this isn't information you need to collect preemptively if you're not certain he or she will need to travel. The practice of minimization brings you under compliance with the GDPR and, above all, exposes your organization to less risk.

## Employee Rights

---

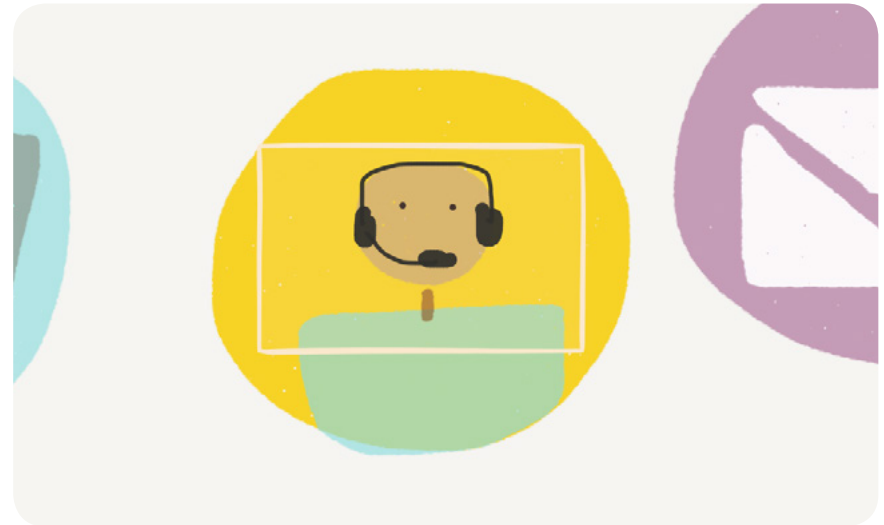
**What the GDPR requires:** The rules around individual rights are some of the biggest changes for HR departments under the GDPR. A few of the new policies include:

- ▶ **Right to access:** Employees have the right to see all their data on file and, should they ask to view it, HR must turn around their request within 30 days, free-of-charge.
- ▶ **Right to rectification:** Employees not only have the right to view their personal data, but also verify and update it.
- ▶ **Right to be forgotten:** Employees have the right to request their personal data be completely erased, as long as it isn't needed (e.g., an employee can't request his or her payment data be deleted while still employed).

**What we did to comply:** PeopleDoc employees already had access to their personal data through the PeopleDoc platform. And, HR managers and employees can easily and regularly verify and update their personal information (e.g., the information that appears on their payslip or employment contract).

What was new for PeopleDoc was the need to formalize and clearly spell out these rights for our employees under the GDPR's strengthened transparency requirements. We developed an **Access Rights Policy** that explains these principles as well as PeopleDoc's protocols for responding to requests.

**How technology helps:** As with the Employee Data Privacy Policy, copies of the Access Rights Policy were stored and managed in the PeopleDoc platform. When HR needs these documents, they can easily search for them by employee name or by other search terms (our **advanced search capabilities** makes finding what you need super easy!)



The very nature of a **digital document management platform** makes GDPR compliance easier. With paper files, employees are easily left in the dark regarding their data. Responding to requests to view, change or erase data is also resource-intensive when paper files are involved.

Paper also complicates matters when it comes to the **right to portability**, which says that, should an employee request data, it must be delivered in a “commonly used” and “machine readable” format. And, employees can request their data be sent directly to another company, which is risky when paper is your primary format. Simply put—more paper, more problems.

## Subcontractor compliance

---

**What the GDPR requires:** A company is held liable for the security of the personal data processed by third-party vendors or subcontractors.

**What we did to comply:** To ensure data security outside our own walls, PeopleDoc set up a **privacy impact assessment** to use with all our vendors and subcontractors. It's a thorough protocol that helps verify the subcontractor's role in processing data, the security measures it has in place, how it manages personal data rights, and many other facets related to the GDPR. We evaluated all current vendors against this list and use it whenever we bring on any new vendors.

**How technology helps:** Before creating the privacy impact assessment, we had to first identify all the personal data we process and map all the ways in which it's transferred, particularly between PeopleDoc and our subcontractors (documenting this information is required under GDPR.) This step was no minor task and took the longest of our GDPR initiatives. However, because the PeopleDoc platform simplifies and streamlines much of our HR operations, we don't have as many subcontractors as we might have otherwise, which greatly reduced the complexity of our data mapping process.



“GDPR changes the way people do stuff today, but it's a good change. It will benefit us all if we understand it right.”

Fernanda Goncalves, Data Privacy & Compliance Manager, PeopleDoc

## Document management

---

**What the GDPR requires:** Retention schedules are not a new challenge, but the new GDPR policies translate to new employee files HR must manage. And, the concept of minimization places greater importance on timely document deletion since a company can be fined for holding onto data it doesn't need.

**What we did to comply:** All the new policies we created under the GDPR resulted in about 400 new documents that needed to be signed or acknowledged (2 new documents to be signed per employee). We developed a **retention policy** outlining the minimum and maximum timelines for keeping each one, while also accounting for varying retention schedules across the 4 countries in which we have employee contracts.

**How technology helps:** Our **employee file management module** significantly eased the administrative burden on our two HR managers. They were able to easily track whether the new documents were signed and program in the new retention schedules (without IT!). When the documents' expiration approaches, they'll receive an alert to update or delete the document.

## Lessons learned

Full GDPR preparation doesn't happen overnight. As with any project, it requires planning, dedicated resources, communication and ongoing program analysis. Based on our experience, here are some points to keep in mind as you and your organization work together towards compliance:

### ► **Compliance isn't one department's job.**

Legal, IT, HR, and governance, compliance, risk (GRC) undoubtedly have a major role to play in data security, but the reality is each and every employee participates in the plan. At PeopleDoc, all employees must sign a Nondisclosure and Confidentiality Agreement, which outlines the appropriate handling of personal data (for both our employees and customers).

### ► **Plan your approach.**

With many facets of the GDPR and numerous stakeholders involved, our first decision was, *where to start?*

We tackled this initiative by breaking it down into 4 projects: (1) verify the application of all GDPR principles, (2) formalize individual rights, (3) map data and ensure subcontractor compliance, and (4) data security.

### ► **Think of the GDPR as an opportunity, not a challenge.**

Instead of perceiving the GDPR as a set of restrictions, think of the GDPR as the opportunity to optimize your data management processes and enhance your employer brand. For PeopleDoc, it was a chance for us to put our values of transparency and security into practice.

## PeopleDoc HR Compliance Assist.

**Stress less. Do more.**

Complying with GDPR along with other regulations and laws can get tricky, especially when each country has its own requirements. On top of that, it isn't always clear how to apply these requirements to digital documents and processes.

Save time digging for answers with **PeopleDoc HR Compliance Assist**, a one-stop online shop to help global HR leaders manage HR compliance and reduce employee data privacy risks.

**Compliance doesn't have to be complicated.**

Learn more







# PeopleDoc - HR Service Delivery Solutions in the Cloud

PeopleDoc is on a mission to make the difficult job of HR easier. The PeopleDoc HR Service Delivery platform helps HR teams easily answer employee requests on demand, automate employee processes, and manage compliance across multiple locations.

PeopleDoc cloud solutions include case management, process automation and employee file management. 100% software as a service, PeopleDoc solutions integrate with existing HR systems, can be implemented in 8-12 weeks, and are designed for agile ongoing use by HR teams serving diverse workforces.

PeopleDoc serves more than 650 clients with employees in 188 countries in twelve languages with a 100% customer retention rate. More information is available at [www.people-doc.com](http://www.people-doc.com).



Learn more

