



PeopleDoc GDPR Compliance Roadmap			
Requirement	Reference	PeopleDoc as a Controller (MyPeopleDoc)	PeopleDoc as a Processor
Lawful, fair, and transparent Data Processing	Article 5; 1 (a)	T&C MyPeopleDoc and Services Data Privacy Policy Personal Data is processed for the provision of the service only	The legal basis for processing data between employer and employee is the Controllers' responsibility PeopleDoc makes available a Services Data Privacy Policy for general information
Purpose Limitation	Article 5; 1 (b)	T&C MyPeopleDoc and Services Data Privacy Policy Personal Data is processed for the provision of the service only	Personal Data are processed only and specifically for the provision of the services and under Controllers' documented instructions
Data Minimization	Article 5; 1 (c)	T&C MyPeopleDoc and Services Data Privacy Policy Data required for a MyPeopleDoc Account: email address, name, surname. Data collected by the system: IP address, browser and operating system	The minimization employer to employee is the Controllers' responsibility
Accuracy	Article 5; 1 (d)	T&C MyPeopleDoc and Services Data Privacy Policy Data can be updated by the user when needed	Controllers can change data following the services features or via the support service
Storage limitation	Article 5; 1 (e)	T&C MyPeopleDoc and Services Data Privacy Policy Data can be updated and deleted by the user when needed	Upgrades in the existing data retention features
Integrity and confidentiality	Article 5; 1 (f)	ISO 27001 and SOC2 PeopleDoc employees NDA	ISO 27001 and SOC2 PeopleDoc employees NDA
Child's Consent	Article 8	Service not applicable for children	Service not applicable for children
Special categories of data	Article 9	T&C MyPeopleDoc and Services Data Privacy Policy PeopleDoc offers a high level of Security, Sensitive Data will only be processed if uploaded by the user	PeopleDoc offers a high level of Security, Sensitive Data will only be processed under Controllers' documented instructions.
Data Subjects Rights - transparency	Article 12	T&C MyPeopleDoc and Services Data Privacy Policy	PeopleDoc makes available a Services Data Privacy Policy for general information
Data Subjects Rights - access	Article 13; 15	T&C MyPeopleDoc and Services Data Privacy Policy Data Subject Access Request Policy Requests may be submitted at <a href="mailto:privacy@people-doc.com">privacy@people-doc.com</a>	Cooperation with the Controller to respond to access requests. Data Subject Access Request Policy
Data Subjects Rights - right to be forgotten	Article 17	T&C MyPeopleDoc and Services Data Privacy Policy Data can be deleted by the user when needed	Upgrades in the existing data retention features
Data Portability	Article 20	T&C MyPeopleDoc and Services Data Privacy Policy Users may download or request their data at anytime	Data is made available on readable format, case by case, according to the reversibility policy and provisions on the Master Services Agreement
Data Protection by Design and Default	Article 25	Security and Data Protection Training Product Review Process	Security and Data Protection Training Product Review Process
Sub-processing	Article 28; 2	T&C MyPeopleDoc and Services Data Privacy Policy The complete list of sub-processors is available at all times at the following page: <a href="https://www.people-doc.com/legal/sub-processors">https://www.people-doc.com/legal/sub-processors</a>	The complete list of sub-processors is available at all times at the following page: <a href="https://www.people-doc.com/legal/sub-processors">https://www.people-doc.com/legal/sub-processors</a>
Compliant contract wording for third party vendors	Article 28; 4	Data Processing Agreements	Data Processing Agreements
Records of processing activities	Article 30	Personal Data Mapping	Individual Controller Register
Security of processing	Article 32	ISO 27001 and SOC2	ISO 27001 and SOC2
Data Breach Response Plan	Article 33	PeopleDoc's Personal Data Breach Policy	PeopleDoc's Personal Data Breach Policy Notification without undue delay
Data Protection Impact Assessment	Article 35	Available upon request	PeopleDoc cooperates with Controllers in their DPIAs
Data Protection Officer Role	Article 37	Legal & Compliance ( <a href="mailto:privacy@people-doc.com">privacy@people-doc.com</a> )	Legal & Compliance ( <a href="mailto:privacy@people-doc.com">privacy@people-doc.com</a> )
Cross-border Data Transfer	Article 44 to 50	Cross-border data transfers are limited according to the information on : <a href="https://www.people-doc.com/legal/sub-processors">https://www.people-doc.com/legal/sub-processors</a>	Cross-border data transfers are limited according to the information on : <a href="https://www.people-doc.com/legal/sub-processors">https://www.people-doc.com/legal/sub-processors</a>
Lead Supervising Authority		France - CNIL	France - CNIL