

GDPR Data Protection Principles and Sage Payroll

Under the General Data Protection Regulation (GDPR), you need to make sure you have policies and procedures in place to cover the data protection principles, can find more detail about this from www.dataprotection.ie and <http://gdprandyou.ie>. No software application will make you GDPR compliant; however in this guide we have put together some of the key points of the GDPR and how you might use Sage Payroll to address these.

With regard to Sage Payroll software, you should ensure that you are on the version that is best designed to help with GDPR activities, at time of writing this is version Micropay 21.0. If you do not have this version or are unsure what version you are on please contact our support team for help.

Fair and lawful processing in a transparent manner

You need to have a lawful basis for processing personal data. You can find out more about the lawful bases from the www.dataprotection.ie and <http://gdprandyou.ie>.

Sage Payroll is primarily designed to hold the data you need to perform your duties. If you do hold personal data in your software, you should review the purpose for holding the data, and make sure it meets the conditions set out by the GDPR. In many cases, this may be covered by your agreement with your customers and suppliers.

When you submit information to www.revenue.ie using Sage Payroll, only the information relevant to the submission is sent.

Collected for specified legitimate purposes

Your organisation should have procedures in place for identifying the reason for processing a personal data. You need to have a clear and compelling case for why you need to use a person's data and it's good practice to document the reasoning behind your decision. This also applies to data used for marketing purposes.

Adequate, relevant and limited to what's necessary

You shouldn't collect more data than is necessary for the original purpose. The best practice is to calculate the information you need in order to achieve your goals and document this.

Accurate and, where necessary, kept up to date

You should take reasonable steps to ensure the personal data you hold is accurate and up to date and have a process in place to address how you'll maintain the data you're processing and storing, for example, carrying out regular audits.

Kept in a form that permits identification for no longer than is necessary

The GDPR doesn't set out any specific minimum or maximum periods for keeping personal data, instead, it says you must keep data no longer than is necessary for the purpose you obtained it for. This protects the individual by making sure irrelevant or out of date information is deleted. You should review the length of time you keep personal data for and if you don't already have one, create a retention policy.

Once you've identified your retention dates, you need to remove any data that's no longer necessary by editing the records or deleting the records.

As per Revenue's guidelines, you (the employer) must keep all company payroll records for six years after the end of the tax year to which they refer and make these records available for inspection when required. After the six year period expires, you should remove the company payroll records that relate to these years from your software - so you're compliant with the General Data Protection Regulation (GDPR). For guidelines on how to remove data on Sage Payroll over 6 years follow this link: <https://pimbrook.ie/knowledge-base/4484/>

Processed in a manner that ensures appropriate technical and organisational security

You should keep the data you hold safe and secure and ensure you have appropriate protection and information security policies, procedures and standards in place. These apply to IT systems, paper records and physical security.

In terms of your software, you must ensure that your computer or network on which it's installed is secure. If necessary, check with your IT support.

Consent

If you have another lawful basis for collecting personal data, you may not always need consent but you need to have policies in place for this. You can find out more from www.dataprotection.ie and <http://gdprandyou.ie>. If you do need consent, you can record this within the software using one of the custom fields to indicate the client has given consent. Alternatively, you may have a process outside of your software for recording this.

GDPR Individual Rights and Sage Payroll

Under the General Data Protection Regulation (GDPR) individuals have increased rights over the personal data you hold on them. This includes the right to know why you're holding their data and what you're using it for, as well as the right to request the data is rectified or destroyed.

You need to make sure you're aware of an individual's rights. You can find out more detail about each right from the from www.dataprotection.ie and <http://gdprandyou.ie>

Right to be informed

You must tell people what you're doing with their personal data, this includes any data that you hold in Sage Payroll. Your company would normally need a privacy statement or notice to cover this. You can find out more about what type of information you need to inform individuals about from the from www.dataprotection.ie and <http://gdprandyou.ie>

If an employee wants to know what personal information you hold for them in Sage Payroll, you can generate the Employee Details report and give it to them. You must also provide a list of all third parties with whom you have (or may have) shared the individual's personal data with. For payroll, this may include:

- The Revenue Commissioners.
- The employee's bank (if paid by Bank Transfer).
- The employee's pension provider (if contributing to a pension scheme).

- The CWPS (if in the construction industry).
- The Central Statistics Office (if the CSO have requested the employer to submit reports to them).
- The Department of Finance (if in the Public sector and paying Pension Related Deduction).

Right of access

Individuals have a right to access their personal data, so they are aware of what data you hold and what you're holding it for. They have a right to:

- Confirmation that you're processing their data.
- Access their personal data.
- Access other supplementary information.

If an individual send you a subject access request (SAR), you must send them the relevant information within one month of receipt. You will be able to extend the period of compliance by a further two months where requests are complex or numerous. If this is the case, you must inform the individual within one month of the receipt of the request and explain why the extension is necessary.

In Sage Payroll, you can generate the Employee Details report and give it to the employee (see above section on the Right to be informed).

Right to rectification

You must make sure that the personal data that you hold for individuals is accurate and up to date. If an individual asks you to correct their data, you must update this in Sage Payroll. You must respond to the individual within one month, or two months if the request is complex.

In Sage Payroll, you can manually amend any field that contains personal data.

Right to erasure (right to be forgotten)

Unless there's another legal reason for keeping personal data, you must delete or remove the data at the request of the individual. You can find out more about when this right applies and other conditions form www.dataprotection.ie and <http://gdprandyou.ie>

In Sage Payroll, you can manually amend any field within an employee's record that contains personal data.

Revenue requires that you store payroll information for the current tax year and a minimum of six years prior to the current tax year. After the six year period expires, you should remove the company payroll records that relate to these years from your software, the following guide outlines how to do this in Sage Payroll <https://pimbrook.ie/knowledge-base/4484/>

Right to restrict processing

Individuals have a right to block or suppress processing of their personal data. If they request this, you can still store their personal data, but you can't process it further. You can keep just enough information about them to make sure the restriction is respected in the future.

If necessary, you can amend information within an employee record to anonymise or remove non-relevant information.

Right to data portability

If an individual has provided their personal data to you on the basis of consent or contract, they have a right to request that the data is returned to them in a structured, commonly-used and machine-readable format, for example, an Excel or CSV file, rather than a Word or PDF document.

You can use the Advanced Report Writer (ARW) software that came free with your Sage Payroll software, to export data from Sage Payroll.

Right to object

Individuals have a right to object to you processing their personal data. This is mainly aimed at using their data for direct marketing, including profiling, however there are other legitimate reasons for objecting. Right not to be subject to automated decision making, including profiling

Individuals have a right to object to being subject to a decision based solely on automated processing, including profiling. If you use an automated decision-making system, it should allow for a human intervention.

Disclaimer

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