

Purge of data:

Making your solution secure and GDPR- compliant

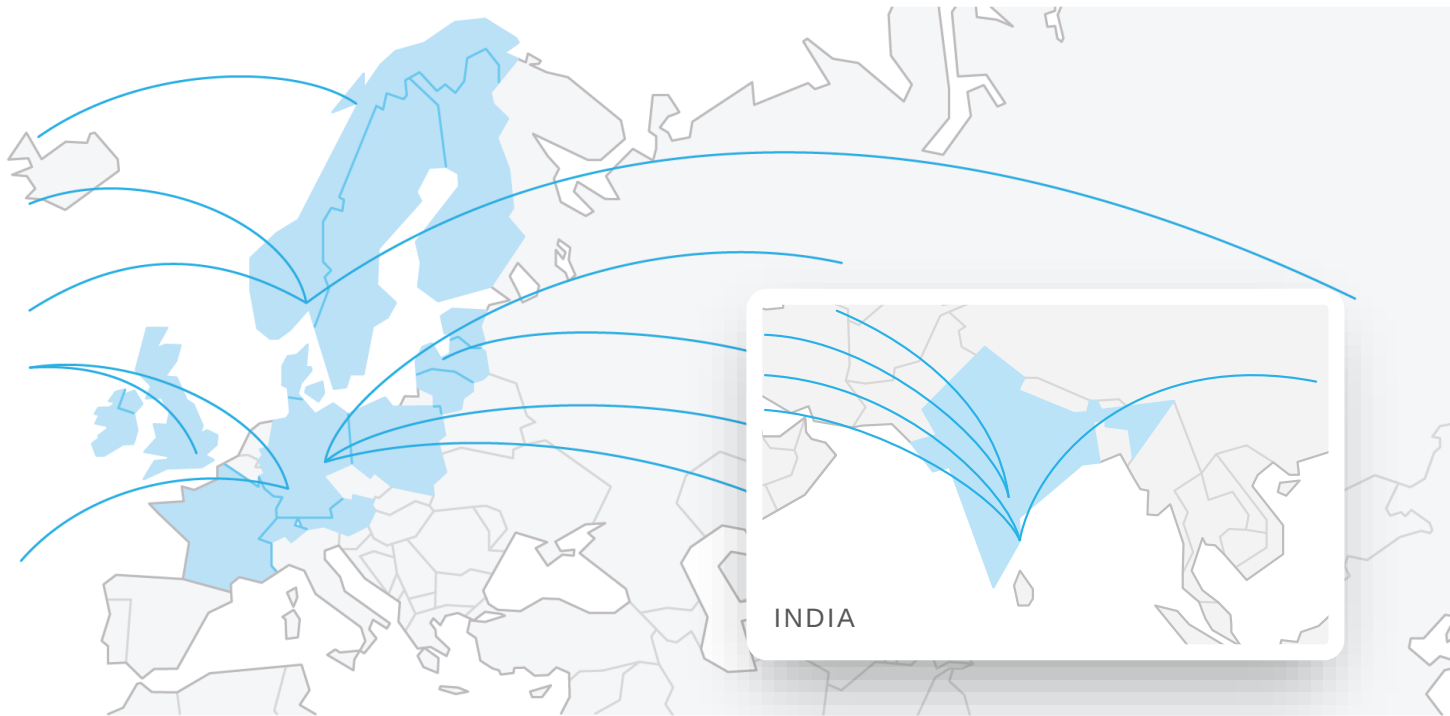


Simplify work life.
Achieve more.



We are an international company

OUR LOCATIONS AND DISTRIBUTION



OUR 2020 REVENUE EUR

78 Million

KEY NUMBERS PART I



1,5 m +

employees served
monthly across all HR
solutions



300,000 +

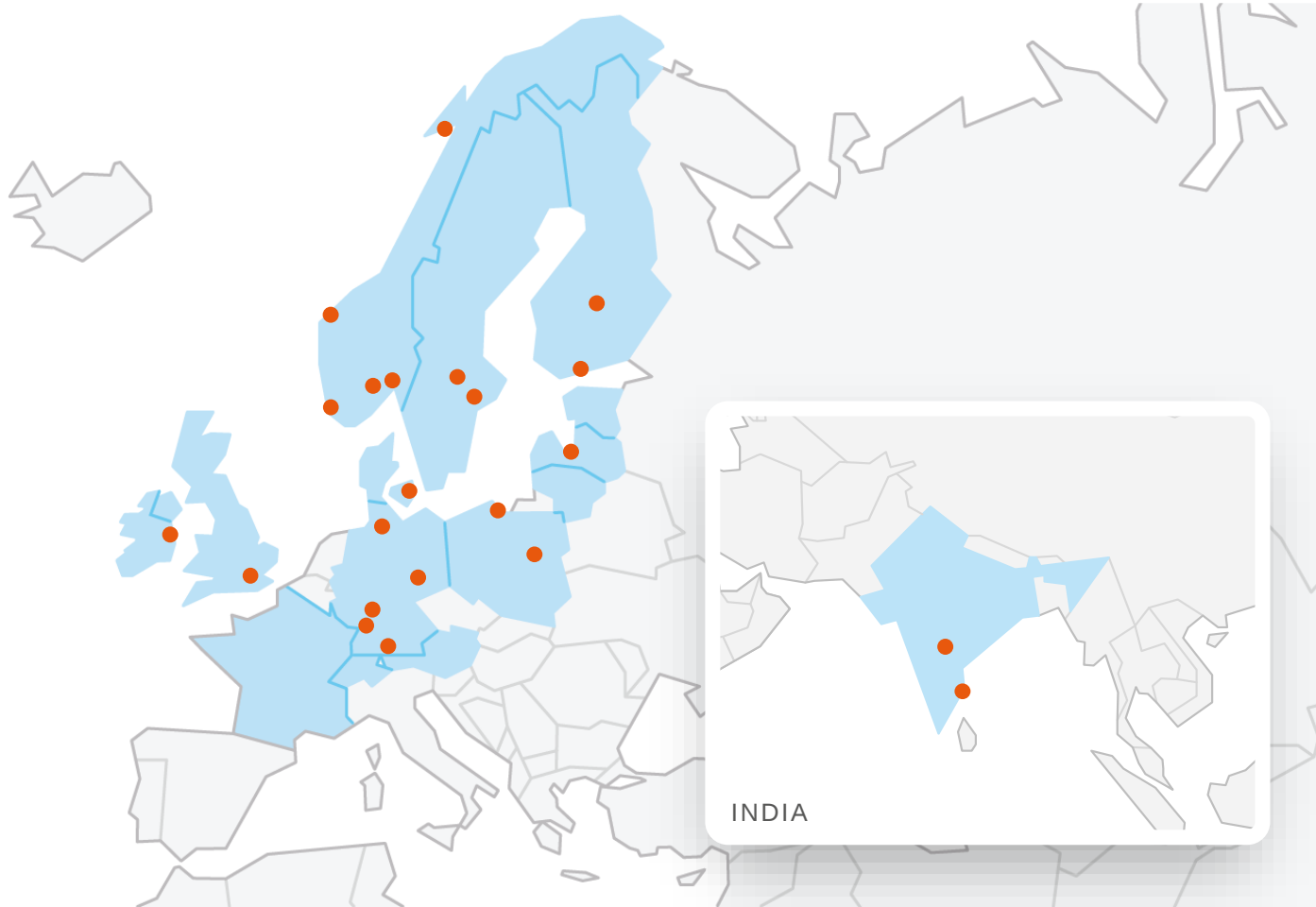
employees served
monthly through payroll
services



300+

clients

We have competent, local service centres



KEY NUMBERS PART II



22

Local service centres



167

Certified Consultants



14

Languages spoken

Our product groups

 Strategic HR



Recruitment



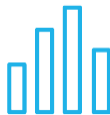
Performance management



Competence



Learning



Analytics

 Core HR



Digital personnel archive



Employee digital management



Time and attendance



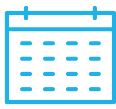
Absence management



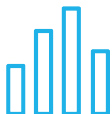
Sick leave monitoring and follow up



Travel and expenses



Employee scheduling and planning



Analytics

 Payroll



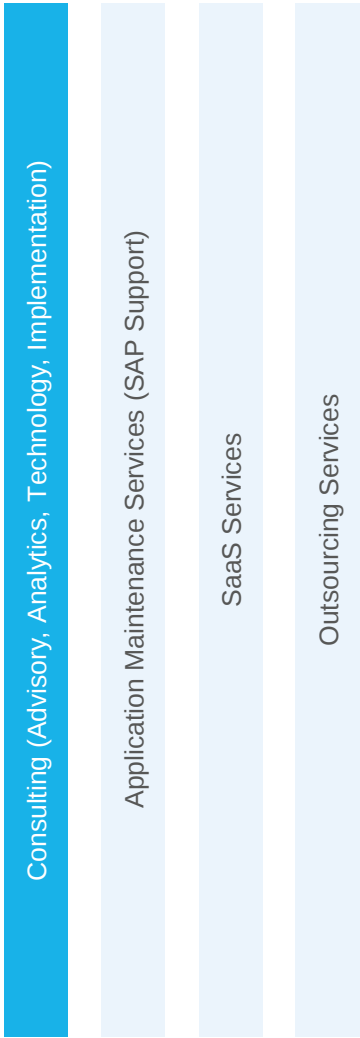
Cloud



Multi country



Analytics



GDPR Fines

Total amount of all GDPR fines

The rough amount of all GDPR fines issued so far is currently over **€303 million**. Interestingly, both the smallest and the biggest fine to this date was issued to Google.

TOTAL AMOUNT OF GDPR FINES

€303 million

LARGEST FINE

€50 million



Google Inc.

18. Foodinho – €2.6 million



On June 10, 2021, Italian DPA issued a fine to a **Glovo-owned company Foodinho €2.6 million** for numerous privacy violations regarding the algorithms used for management of its employees.

The Garante found that Foodinho had not adequately informed employees on how the system works and did not guarantee the accuracy and correctness of the results of the algorithms used for the evaluation of the workers.

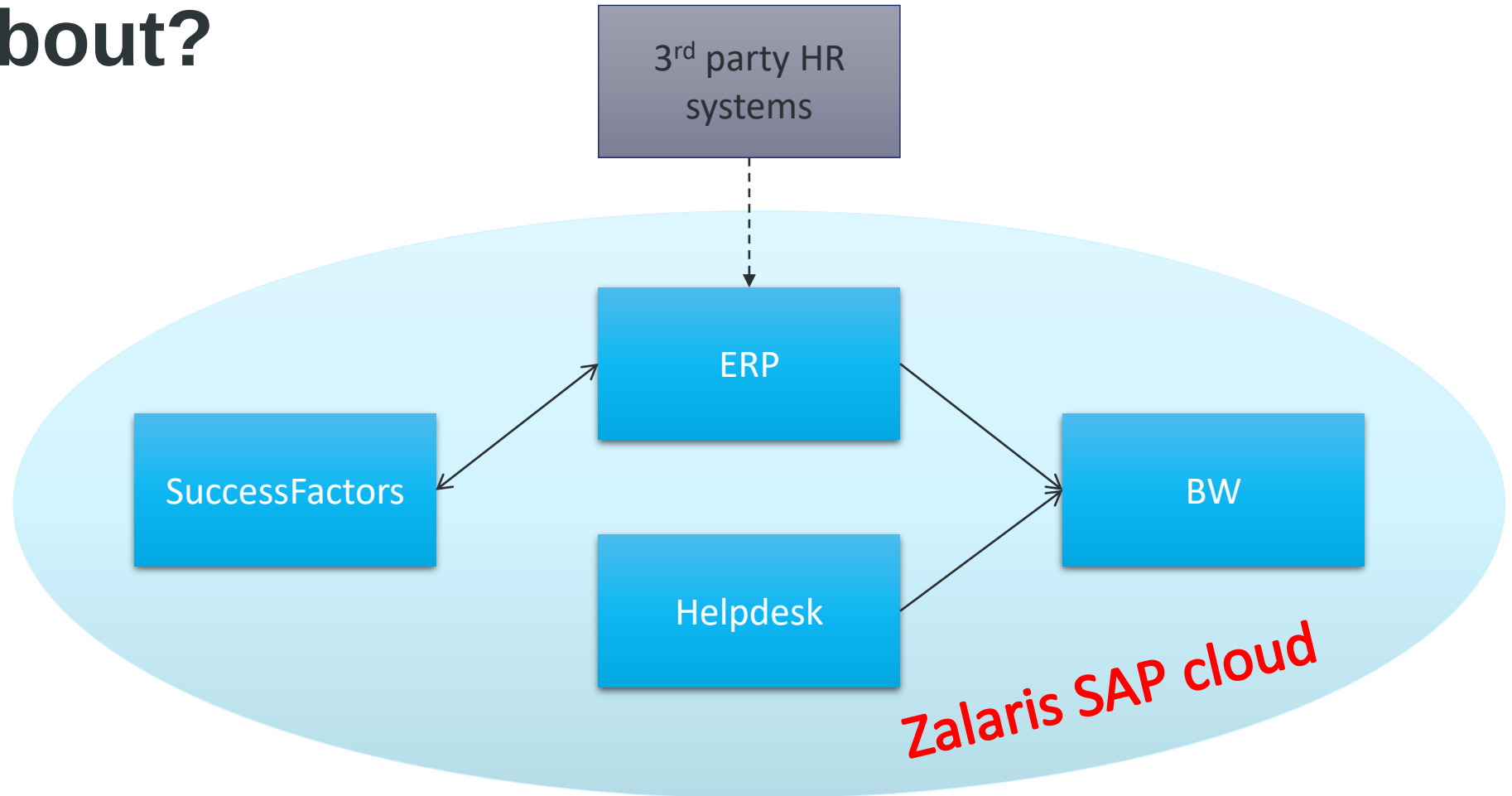
Foodinho did not have proper procedures in place to protect the right to obtain human intervention, express opinion, or contest the decisions adopted through the use of the algorithms, excluding some of its employees from job opportunities.

The Garante also identified a **number of shortcomings** regarding technical and organizational security measures, data protection impact assessments, and record-keeping.

Source: [20 biggest GDPR fines so far \[2019, 2020 & 2021\] – Data Privacy Manager](#)

What is it about?

- ✓ Systems in scope:
 - ERP (HCM + Payroll)
 - SuccessFactors
 - BW
 - SAP Helpdesk
- ✓ Countries:
 - ...
 - ...



Complex SAP system landscape => Challenges

- Each customer has its own unique setup
- The solution is not very attractive
- Each subsystem affects other ones
- Each customer has its own unique internal processes
- SAP standard doesn't address all our requirements
- The data is extremely sensitive
- The data is essential



Complex SAP system landscape => Challenges

- Each customer has its own unique setup
- The solution is not very attractive
- Each subsystem affects other ones
- Each customer has its own unique internal processes
- SAP standard doesn't address all our requirements
- The data is extremely sensitive
- The data is essential

How do we overcome complexity issues

1. *All different – all equal*: Tailoring the approach for the customer
2. Collaboration workflow: Transparency, decomposition, iterations
3. Going beyond SAP standard
4. Thorough risk management

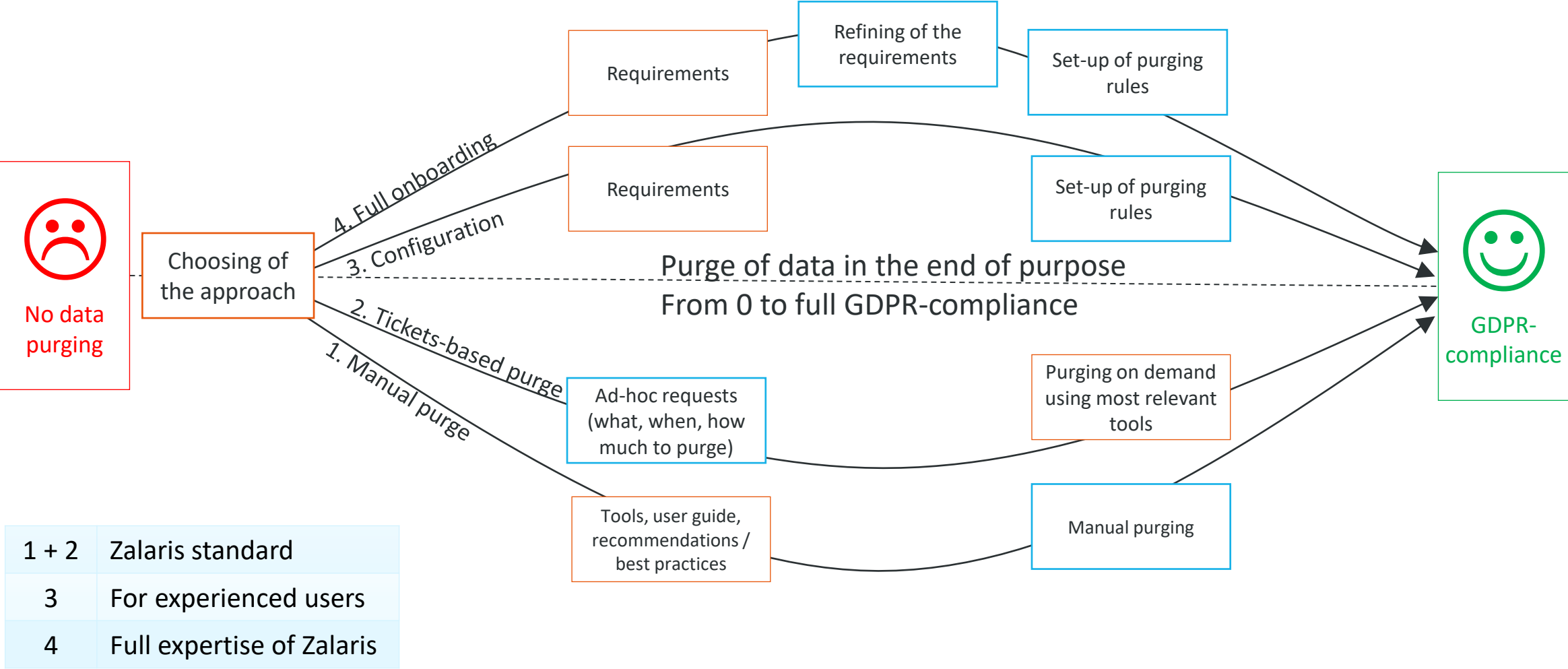
How do we overcome complexity issues

1. *All different – all equal:* Tailoring the approach for the customer
2. Collaboration workflow: Transparency, decomposition, iterations
3. Going beyond SAP standard
4. Thorough risk management



4 Approaches to compliance

GDPR Responsibility:
 - Zalaris (Data Processor)
 - Customer (Data Owner)



How do we overcome complexity issues

1. *All different – all equal*: Tailoring the approach for the customer
2. **Collaboration workflow: Transparency, decomposition, iterations**
3. Going beyond SAP standard
4. Thorough risk management



Simplify work life.
Achieve more.



4. Full onboarding

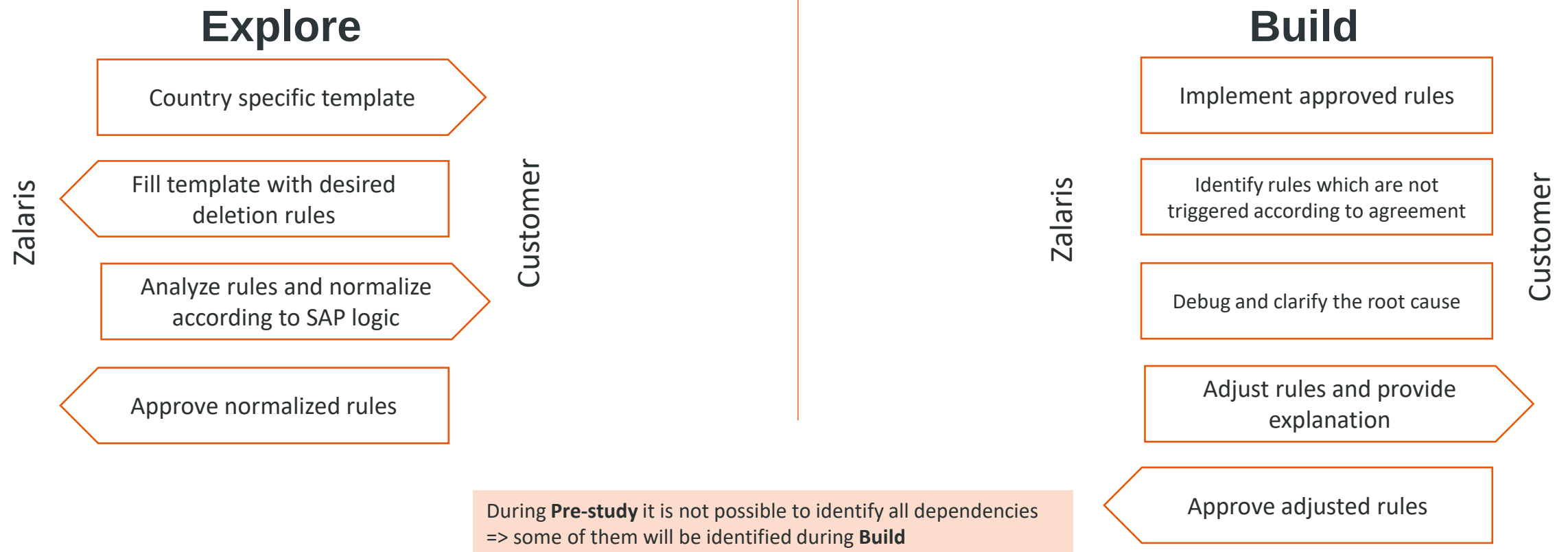


Requirements

Implementation

Testing and approval

4. Full onboarding: Collaboration workflow: SAP



4. Full onboarding: Collaboration workflow: Requirements' template

Country X		REGULATIONS REGARDING DELETION IN SITUATIONS WHEN EMPLOYEES TERMINATE THEIR EMPLOYMENT WITH ZALARIS' CUSTOMERS						
IT	Data category	Filled by customer		Filled by Zalaris				
		Suggested deletion rule	Argument and law:	Pre-study suggested	Implemented deletion rule	Additional constraint	After	Reason
2	Personal data	E.g. earliest X years after the end of the fiscal year if the company also stores the data elsewhere	E.g. Employees' names must be stored X years after the end of the fiscal year, cf. the Bookkeeping Legislation Section Y and the Bookkeeping Regulation Section Z		After X years	No. Because customer stores this data also elsewhere	End of fiscal year	E.g. this infotype participate in payroll calculation and therefore is required to fulfill the contract. X is more or equal to amount of years how long customer may claim salary correctness, therefore data is kept for X years to fulfill the contract.
6	Addresses	E.g. as soon as possible	E.g. in most cases, it is not necessary to store information about a former employees' address longer than 6 months after the termination, unless there is an ongoing dispute etc. - not explicitly specified in BL/BR.		After X years.		End of fiscal year	E.g. this infotype is required for tax submission to authority regarding sickleaves, therefore is required for payroll recalculation after which submission occurs. Employee can make claim regarding payroll within X years after termination.
16	Length of notice	E.g. as soon as possible	E.g. In most cases, it is not necessary to store data about a former employees' length of notice - not explicitly specified in BL/BR/if at all		As soon as possible		Termination date	
33	Statistic codes for notifications	E.g. No deletion	E.g. Statistic codes are not considered as personal data.		No deletion			
9007	Reference to CRM cases				After X years		End of fiscal year	E.g. Reference is required for tracking back errors and understanding why something was done regarding payroll, e.g. for SOC audit evidence or customer salary claim
9997	Customer contact				As soon as possible		Termination date	
9999	Access control to portal				As soon as possible		Termination date	

4. Full onboarding: Timeline

PHASE		Week	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
P000	Prepare																
E000	Explore																
R000	Realize-Build																
T000	Realize-Test																
D000	Deploy																

How do we overcome complexity issues

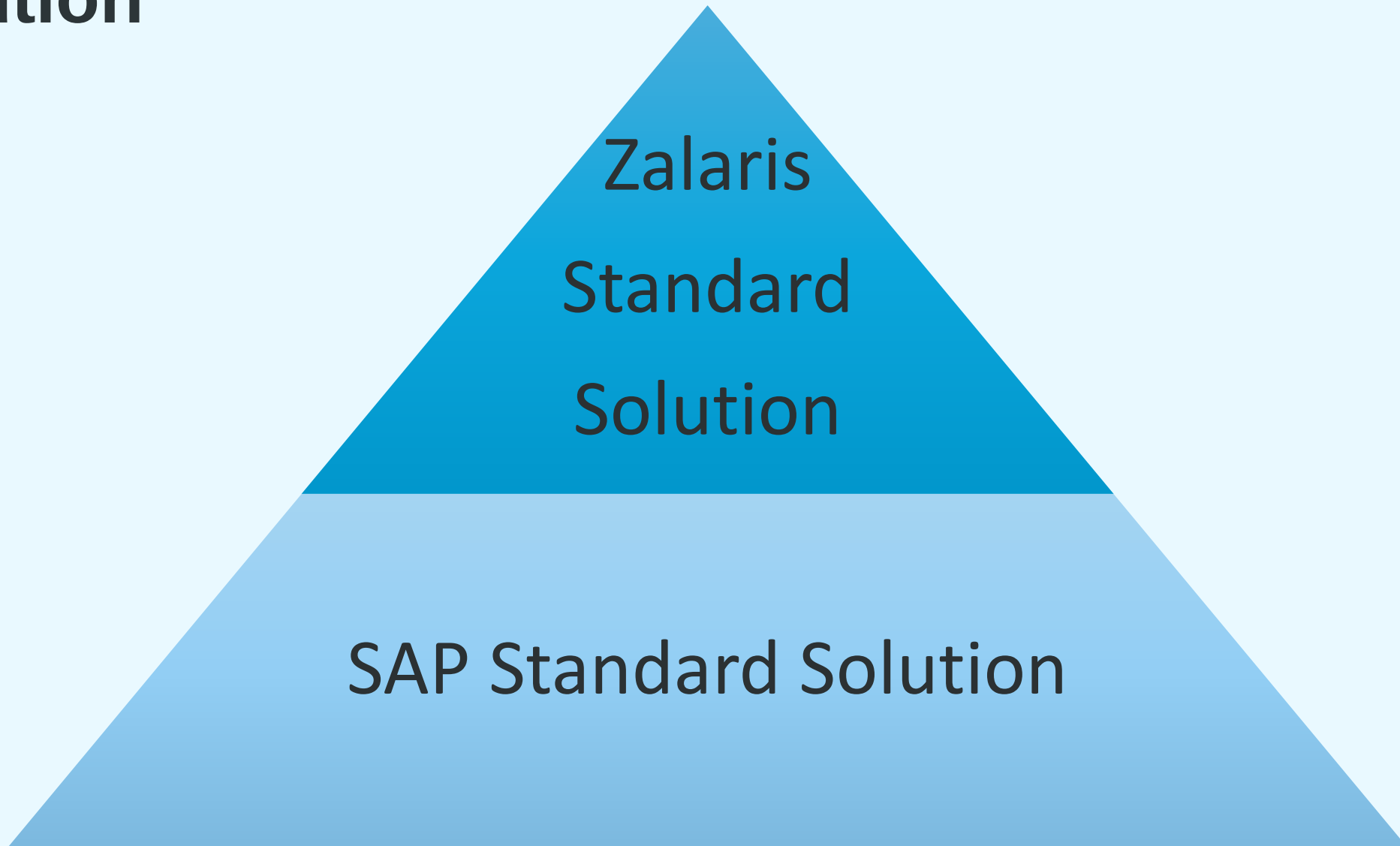
1. *All different – all equal*: Tailoring the approach for the customer
2. Collaboration workflow: Transparency, decomposition, iterations
3. **Going beyond SAP standard**
4. Thorough risk management



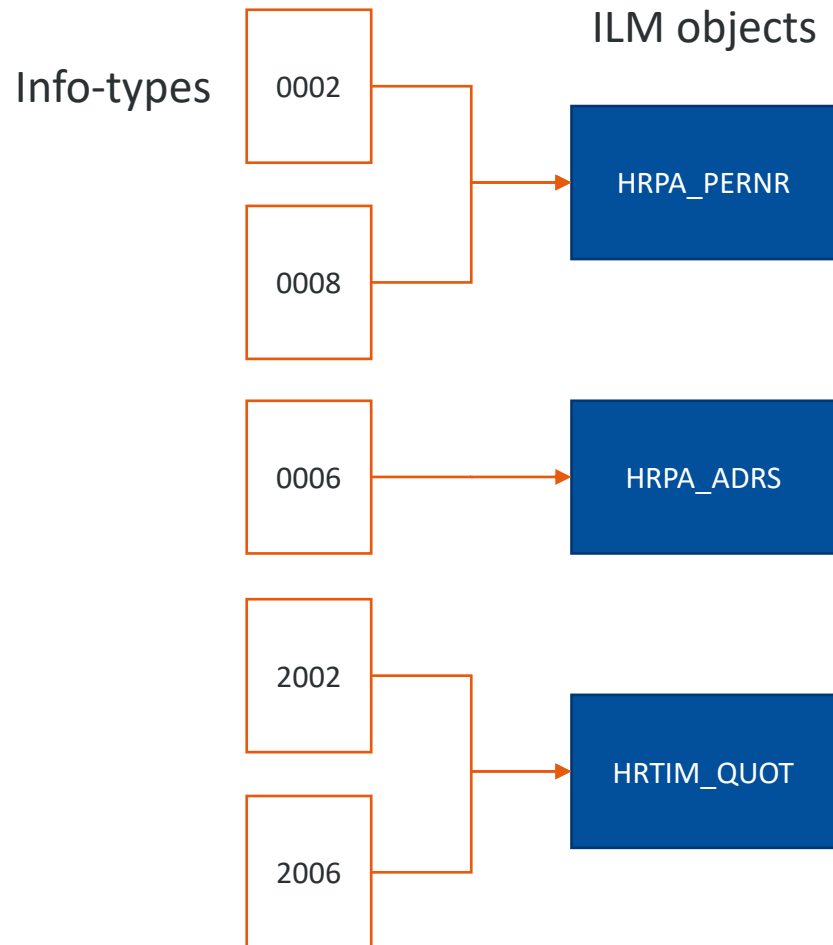
Simplify work life.
Achieve more.



Solution

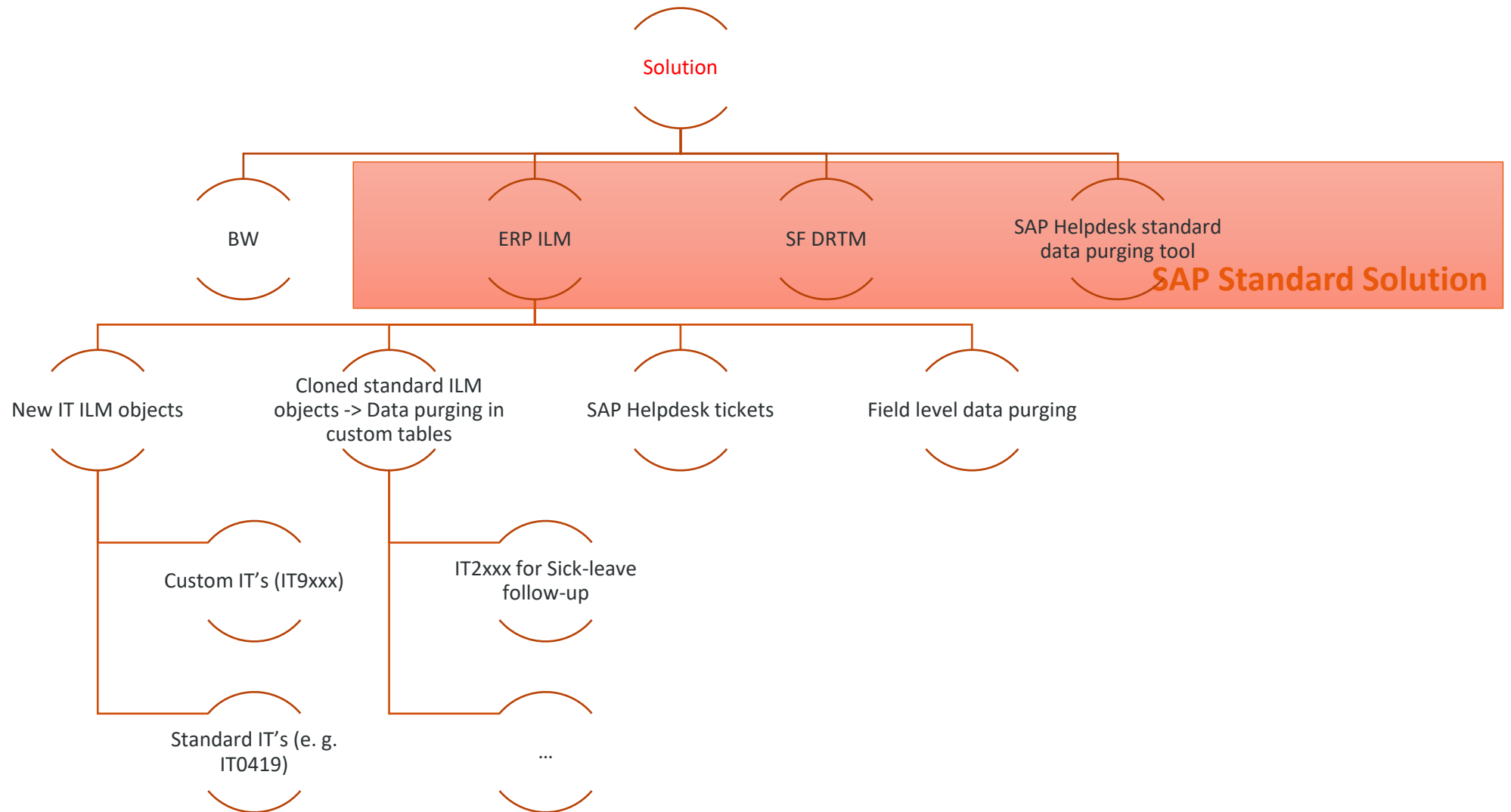


SAP: ILM objects

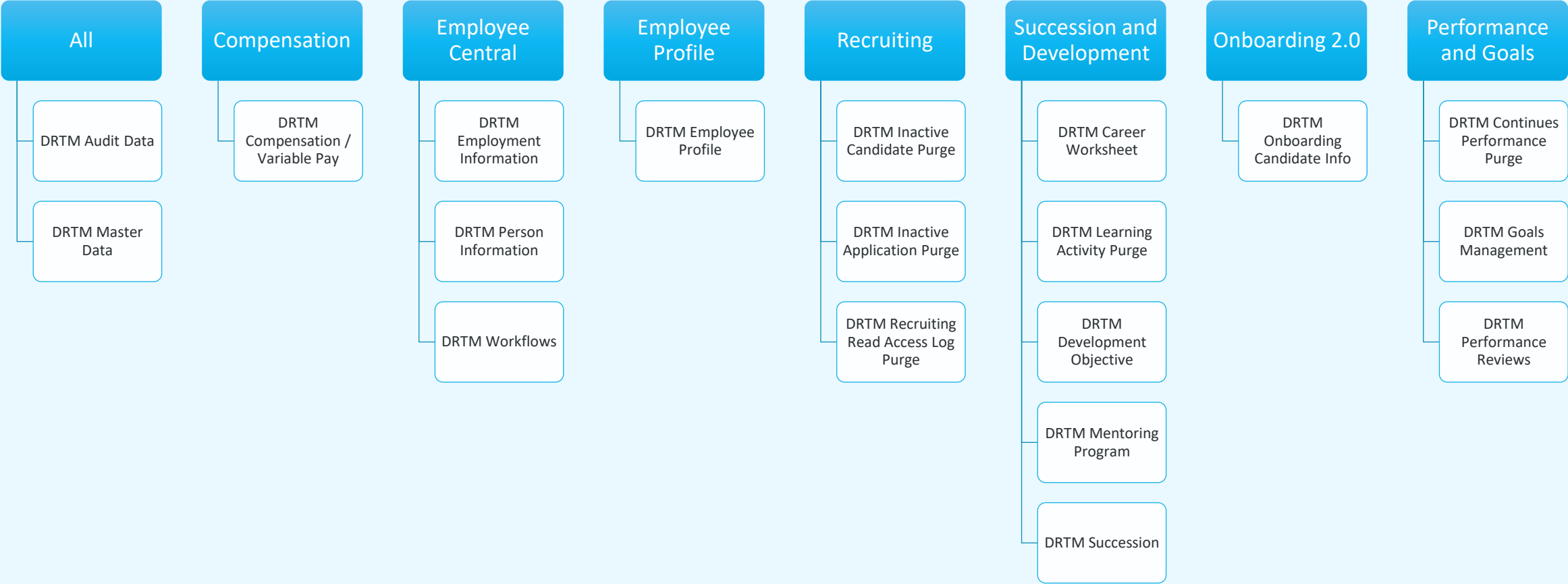


- Info-type has a corresponding ILM object
- Certain info-types -> common ILM object
- Object HRPA_PERNR -> whole employee
- **Custom info-types -> custom ILM objects**
- Objects includes ITs, tables, clusters, etc.
- **Field level deletion -> *data substitution***

Additional development to ERP ILM



SuccessFactors

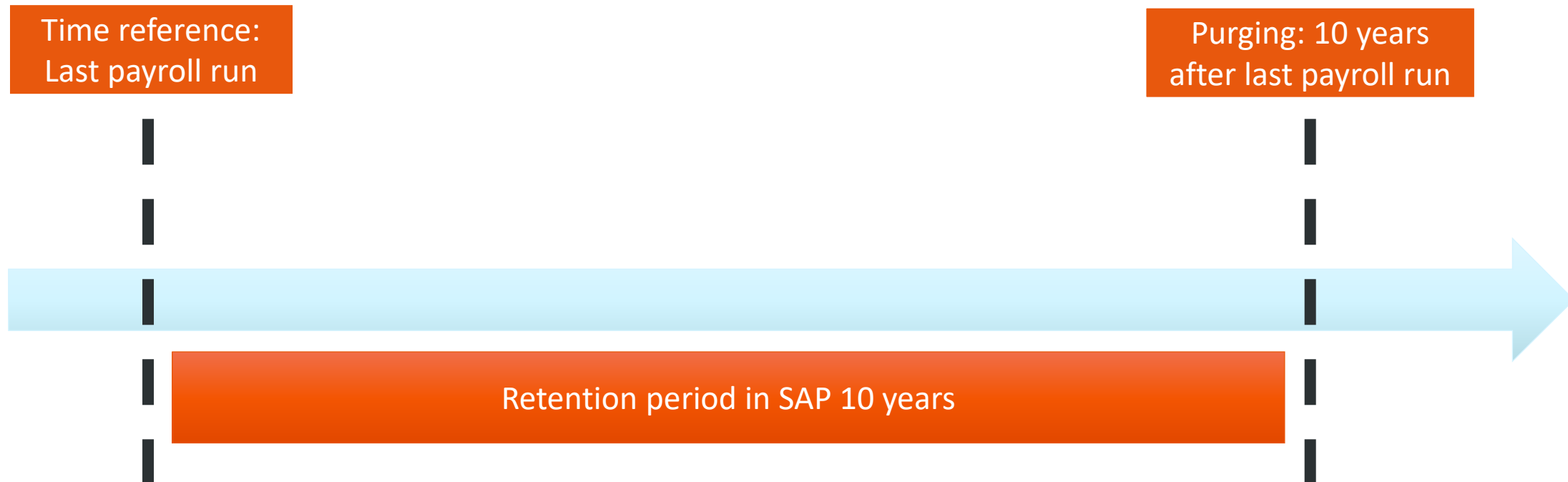


Master and Slave systems

Main challenge – to align SF rules with SAP GUI rules:

No 1:1 mapping between the rules in the systems

Integration directions(-s)



SAP Helpdesk tickets

- Standard SAP Helpdesk purging solution allows considering of retention period only
- Some of the tickets (having reference in SAP IT9007) beyond retention period still need to be retained

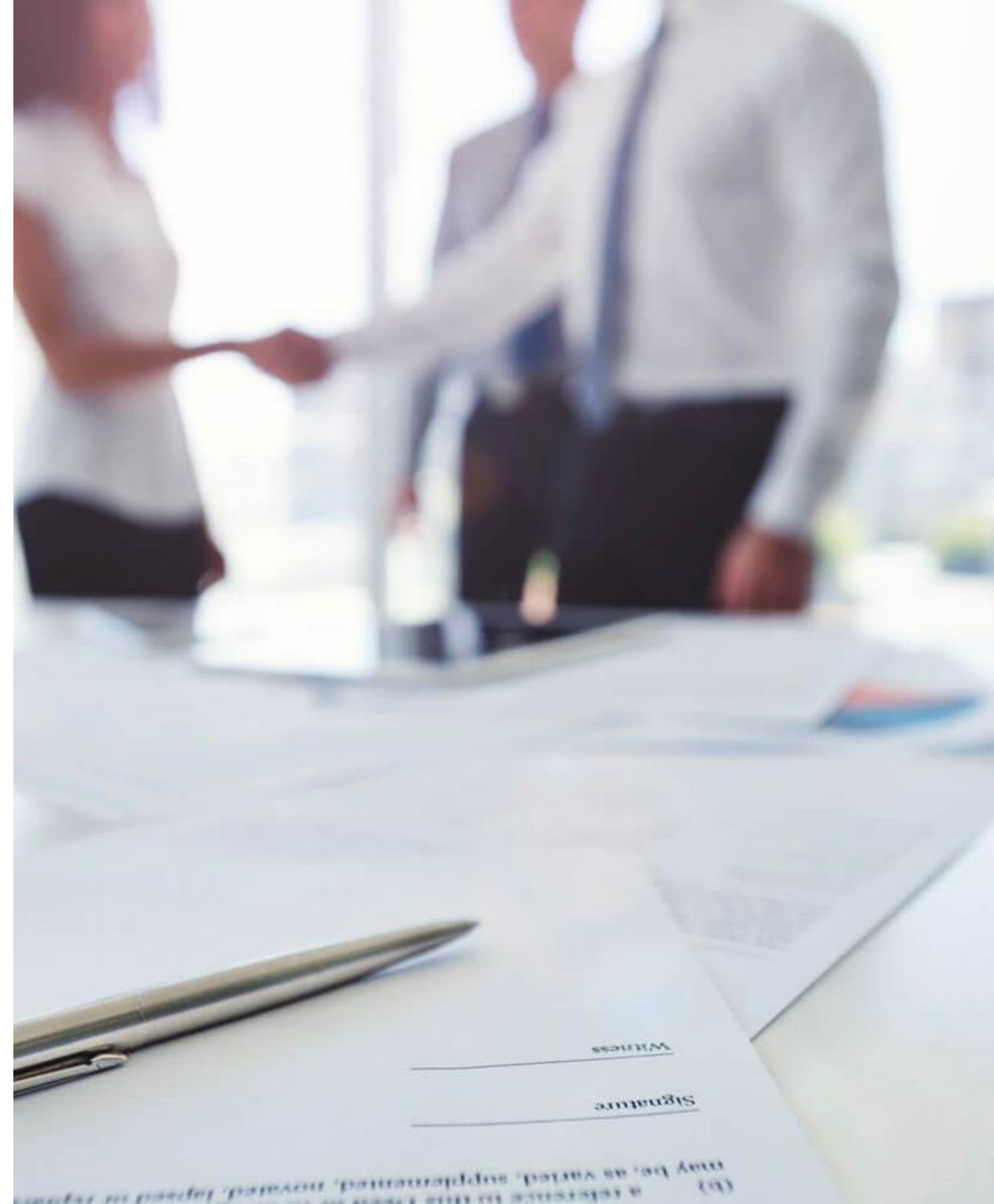


- SAP Helpdesk tickets cannot be purged directly in SAP Helpdesk – no access to SAP IT9007 from there
- The solution for SAP Helpdesk tickets' purge should be made on SAP side



SAP Helpdesk tickets

- SAP Helpdesk is fully integrated in Zalaris data purging solution => we are compliant here
- If you have 3rd party Helpdesk/CRM solutions – you should integrate with them



How do we overcome complexity issues

1. *All different – all equal*: Tailoring the approach for the customer
2. Collaboration workflow: Transparency, decomposition, iterations
3. Going beyond SAP standard
4. **Thorough risk management**



Simplify work life.
Achieve more.



Common pitfalls

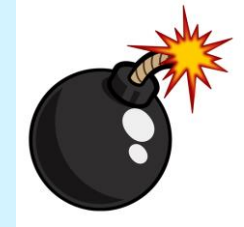
✓ **Purge too much actual/historical data:**

Reason: Some of dependencies are not identified during analysis/implementation

Impact: Key processes (such as payroll, retroactive payroll run, reporting, audit) are blocked

Avoidance: Involving key process people

Mitigation: Rollback plan



✓ **Purge too little data:**

Reason: People responsible for their processes are simply afraid to get rid / lost the data

Impact: GDPR requirements are not *fully* met

Avoidance: Identifying precise end-of-purpose moments for each piece of data

Mitigation: Involving more authorized decision-makers

✓ **Purging is not aligned with downstream / 3rd party systems:**

Reason: Some of dependencies are not identified during analysis/implementation

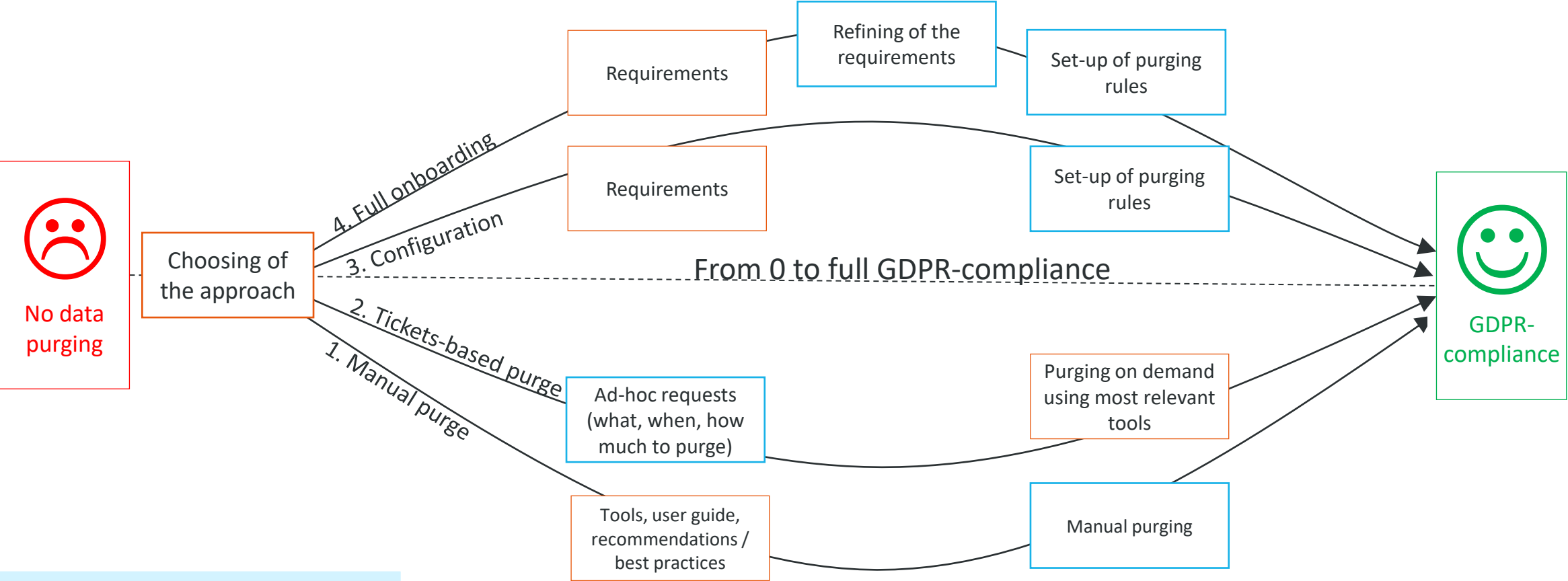
Impact: Downstream / 3rd party systems are starving

Avoidance: Integration analysis

Mitigation: Rollback plan

Purge of data in the end of purpose

GDPR Responsibility:
 - Zalaris (Data Processor)
 - Customer (Data Owner)



Have questions / need help?
Don't hesitate to contact us! ;)

“

We simplify HR and payroll administration, and empower you with useful information so that you can invest more in people.

Thank you!

Jevgenijs Jelniks, Data purging

Project manager, Jevgenijs.Jelniks@Zalaris.com



Simplify work life.
Achieve more.

