Privacy and Cyber Security for Payroll Pros: A Global Perspective

Steve Sheinberg

General Counsel & SVP, Privacy and Security

Payroll Privacy is...Confidentiality

▸ Workplace policies that lawfully handle discussions of salary

▸ Have procedures for every request

▸ Physical set up for payroll professionals

Payroll Privacy is...Cyber Security

- Employees are the key threat vector
- Teach social engineering defense
- Use 2FA
- good password complexity and change
- Protect yourself with vendors
- Update software, install patches
- Encrypt
- Segregate data
- Plan for off-boarding
- Plan to identify and mitigate breaches
  - Payroll data breach reporting process
  - Review agreements w/ 3rd parties for notification and process
  - Notification to employees

Payroll Privacy is…Legal Compliance

EU/GDPR:

▸ Applies to all business within EU, including handling of EU-based employee data from outside EU

▸ Security and Privacy are intertwined: "the controller and the processor shall implement appropriate technical and organisational measures to ensure a level of security appropriate to the risks represented by the processing"

▸ The above security recommendations = obligatory

▸

GDPR: EU Law and Good Policy

▸ Personal data must be processed lawfully, fairly and in a transparent manner in relation to the data subject.

▸ Personal data must be collected only for specified, explicit and legitimate purposes. It must not be further processed in any manner incompatible with those purposes.

▸ Personal data must be adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed "minimized."

▸ Personal data must be accurate and, where necessary, kept up to date.

▸ Personal data must not be kept in a form which permits identification of data subjects for longer than is necessary for the purposes for which the data is processed.

▸ Personal data must be processed in a manner that ensures its appropriate security.

▸

Other Jurisdictions

- Japan
- China
- Brazil
- Russia
- India

▸ Thank you!