

What is considered personal data?

▶ **Any information enabling a specific person to be identified**

Examples

- First name and surname
- Picture
- Birth date
- Family status
- Profession
- Hierarchical position
- Salary
- Tax situation
- Social Security number

But also...

- Nickname
- Login
- Cell phone number
- Personal address
- GPS localization
- IP address
- Digital footprint
- DNA
- Car license plate
- Credit card number

And also these extra sensitive information.

- Health data
- Biometric data
- Racial or ethnic origin
- Political opinions
- Sexual orientation
- Religious or philosophical beliefs
- Trade union membership

What are we HR supposed to do?

- ▶ Make sure we have the right processes in place to:
 - Receive express consent from employees as to the use of their personal data
 - Store personal data in a safe way with limited access
 - Keep personal data no longer than necessary
 - Work with vendors (IT firms, recruiters, etc.) which comply with data protection rules
- ▶ Ensure that no sensitive personal data is collected without green light from Legal (which will need strong justification to allow it)

Why should we care?

- ▶ We need to be ready to answer employees / former employees requests to give them access to all of their personal data or to delete such data
- ▶ In case of non-compliance, potential fine up to 4% of the turnover (i.e., more than EUR 120 million for Brink's!) + possible claims for damages from employees