



GDPR Compliance FAQ

What is GDPR and what is PeopleAdmin doing to be compliant?

Let's say that Sara is an applicant of yours and an EU citizen. She's called the "data subject," and your institution is called the "controller" of that data. Since you're a PeopleAdmin customer, PeopleAdmin acts as the "processor" of Sara's data on behalf of your institution.

As the processor of Sara's data on your behalf, PeopleAdmin is committed to a roadmap of GDPR compliance. In some cases, PeopleAdmin offers very specific feature sets and opportunities designed to remain compliant, and in other cases, PeopleAdmin provides the flexibility and configurability you require to remain compliant as a data "controller."

Below are essential components in GDPR compliance and what PeopleAdmin provides to maintain compliance.

What it is	What it means	What PeopleAdmin provides
Deletion	<p>Sara has the right to request that you delete all the personal data you have about her. The GDPR requires the permanent removal of Sara's contact from your database.</p> <p>In many cases, you'll need to respond to her request within 30 days. The right to deletion is not absolute, and can depend on the context of the request, so it doesn't always apply.</p>	<p>When Sara requests a permanent deletion of her data, PeopleAdmin is happy to purge that data on your behalf. Simply submit a Support ticket with links to the records you would like deleted, and we can purge that data for you.</p>
Withdrawal of consent	<p>Sara needs the ability (as data subject) to see what she's signed up for, and withdraw her consent (or object to how you're processing her data) at any time. In other words, withdrawing consent needs to be just as easy as giving it.</p>	<p>PeopleAdmin provides all applicants the ability to withdraw an application and remove herself from further PeopleAdmin-powered communications. This visibility and control is provided within her applicant profile.</p>
Access / Portability	<p>Just as she can request that you delete her data, Sara can request access to the personal data you have about her. Personal data is anything identifiable, like her name and email address. If she requests access, you (as the controller) need to provide a copy of the data, in some cases in machine-readable format (e.g. CSV or XLS).</p>	<p>Just as Sara has the ability to withdraw an application and opt out of email communications, Sara can also view any personal data she has submitted to your institution by visiting her candidate or</p>



	Sara can also request to see and verify the lawfulness of processing (see above).	applicant profile. PeopleAdmin also retains comprehensive reporting on the processing of candidate information, any of which can be requested and contested for lawfulness by an applicant.
Modification	Just as she can request to delete or access her data, Sara can ask your institution to modify her personal data if it's inaccurate or incomplete. If and when she does, you need to be able to accommodate that modification request.	Sara can easily modify personal data if it's inaccurate or incomplete by updating her candidate or applicant profile.
Consent	<p>One type of lawful basis of processing is consent with proper notice.</p> <p>In order for Sara to grant consent under the GDPR, a few things need to happen:</p> <ul style="list-style-type: none"> • She needs to be told what she's opting into. • She needs to affirmatively opt-in. • The consent needs to be granular, meaning it needs to cover the various ways you process and use Sara's personal data (e.g. marketing email or sales calls). 	<p>PeopleAdmin provides highly configurable form views and instructional text options for your institution's applications. In order to update the certification statement on your application, you may edit it in the Admin Module, in the General Setup dropdown, in the "Position Type Settings" feature.</p> <p>To modify any instructional text to ensure that you have provided EU citizens the information necessary to provide informed consent, please contact PeopleAdmin support to modify your forms and instructional text.</p>
Security Measures	The GDPR requires a slew of data protection safeguards, from encryption at rest and in transit to access controls to data pseudonymization and anonymization.	PeopleAdmin takes data security very seriously. Please review our data security policy online at www.peopleadmin.com/privacy
Lawful basis of processing	You need to have a legal reason to use Sara's data.	PeopleAdmin provides your institution the ability to configure application forms and instructional text to ensure you clearly



		articulate to your candidates why you are collecting specific data pertaining to employment.
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Does the GDPR apply to me?

If you control or process the data of EU citizens, the GDPR will apply to you. For many institutions, this is by way of EU citizens applying to a position at your institution.

How do I determine if an applicant is an EU citizen, and therefore protected by GDPR?

This is up to your institution. You may handle it as it comes up, or you may request that Support add a “Are you an EU citizen?” question to your applications. You may also choose to add an “opt in” certification to all applications, ensuring that any applicant who certifies and submits their application to your institution is aware that their data will be used in employment decisions.

Is my site currently compliant?

Each PeopleAdmin client is already enabled to be compliant in: Access / Portability, Security Measures, Withdrawal of Consent, Deletion, and Modification. Individual sites and institutions may need to be updated to comply with Consent and Lawful Basis of Processing.

- If you find that your site needs the certification statement updated to become compliant with **Consent**, you may do so by modifying your Application Certification Statements in the Admin Module, under the General Setup tab, in the Position Type Settings. You may also initiate a request with Support that we add specific fields, instructional text, or help text to your site outlining additional consent, as determined by your institution.
- If you find that your site needs the certification statement updated to become compliant with **Lawful Basis of Processing**, you may need to review how your institution is currently using applicant data, and determine if you need to further articulate to the Applicant how their data is being used. You may do so by modifying your Application Certification Statements in the Admin Module, under the General Setup tab, in the Position Type Settings.



You may also initiate a request with Support that we add specific fields, instructional text, or help text to your site outlining additional Lawful Basis of Processing documentation, as determined by your institution.

When will PeopleAdmin be updating its legal documentation?

You can review our recently updated Privacy Policy at www.peopleadmin.com/privacy

Does the GDPR require personal data be stored in the EU? What does PeopleAdmin do to ensure lawful data transfers from the EU?

No. There is no obligation under the GDPR for data to be stored in the EU and the rules regarding transfer of personal data outside the EU remain largely unchanged.

I have old applicants in my database that I don't have specific opt-in records for. Do I need to delete them by May 25th?

That's up to your institution. If you choose to delete any records, please contact Support to do so. Before you make that decision, however, carefully consider the lawful basis under which you process these contact records. Sara indicated legitimate interest in your institution and you continue to process her data along with other applicant data to ensure inclusive and optimal hiring processes.

Will PeopleAdmin be able to comply with the right to erasure (right to be forgotten)?

Yes. When one of your contacts (i.e. data subjects) asks you to delete them from your records, please submit ticket to the Support team with specific links to the data you would like deleted on the Applicant's behalf. PeopleAdmin support and we can purge that record for you. The data will not be recoverable.