



Payroll

# Protection of Personal Information

July 2021

V1.0



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# 1. Introduction

Increasingly in society there is a concern over the misuse of personal information. Many countries have created legislation to govern these concerns. Some examples are:

Australia – The Privacy Act

South Africa – POPIA

Malaysia – PDPA

European Union - GDPR

It should be noted that the United States of America does not have a common law governing the protection of personal information. Instead one needs to consider various sectoral and state laws.

Sage Payroll cannot offer any guarantee of compliance with any laws, regulations or standards governing the protection of personal information with the use of our software. This is because the requirements do not apply to just software, but rather the governance applied by a business, and how they make use of personal information. Sage Payroll further cannot guarantee how our customers might use our software and apply the data fields and tools that we make available to our users. It is our customers' responsibility for adopting the governance measures that are deemed appropriate in their circumstances to achieve compliance.

ISO27001 is an established industry standard for information security. This Standard describes the best-practice requirements for implementing an information security management system (ISMS) that would embrace the protection of personal information. Many government organizations responsible for the governance of laws relating to the protection of personal information regard the observance of ISO27001 by a business as evidence of intent and effort to comply with the protection of personal data regulations.

This document aims to set out where Sage Payroll records and reveals personal information, and what Sage Payroll provides to assist in the protection and management of such information. Whilst every effort has been made to ensure the completeness of this document there is no guarantee that every aspect of Sage Payroll with relevance to personal information has indeed been included. The document is intended for deployment on Sage City for use by the Sage Business Cloud Payroll community.

This document applies to Sage Payroll July 2021 onwards.

## 2. What is Personal Information

Sage Payroll has undertaken a careful assessment of system data that may be construed as personal data. Requirements vary from country to country, but most often include (amongst others):

- Name
- Address
- Age
- Biometric data
- Email address
- Genetic data
- Gender data
- Health information
- IP address
- Location data
- Marital status
- Nationality
- Online behavior (cookies)
- Photo
- Political opinions
- Pregnancy
- Profiling and analytics
- Race
- Religion
- Sexual orientation
- Trade union membership

Some information recorded in Sage Payroll will always need to be regarded as personal information. Examples are Employee, Employer and Company information recorded in addition to Sage Payroll User information. Depending on circumstances, some information may need to be regarded as personal information. For instance, POPIA applies to natural persons and juristic persons (e.g companies) whereas GDPR applies to natural persons only. This document does not consider any additional requirements that may be necessitated in such a situation but would always rather take the cautious approach to manage data as Personal Information.

This document categorizes personal information into the following categories:

- Employee data that is personal in nature
- Employer data that is personal in nature
- Company data that is personal in nature
- Data regarding Sage Payroll Users and defined roles (individuals recorded as users or responsible individuals in the system)

Personal Data is thus any information that relates to an individual, either alone or when combined with other information. Sage might possess and generally includes names, addresses, phone numbers, email addresses, performance ratings, credit card and bank details, payment records and similar information. Any information that could be used to identify an individual (either directly or indirectly) is treated as Personal Data.

### 3. Reports in Sage Payroll that reveal Personal Information

The nature of Payroll is capturing & processing personal information. As such, nearly all the reports provided with Sage Payroll contain various amounts of personal information.

### 4. Data transfer files that include Personal Information

The Data Transfer/Import programs listed below include fields that contain or may contain personal data in their file structure.

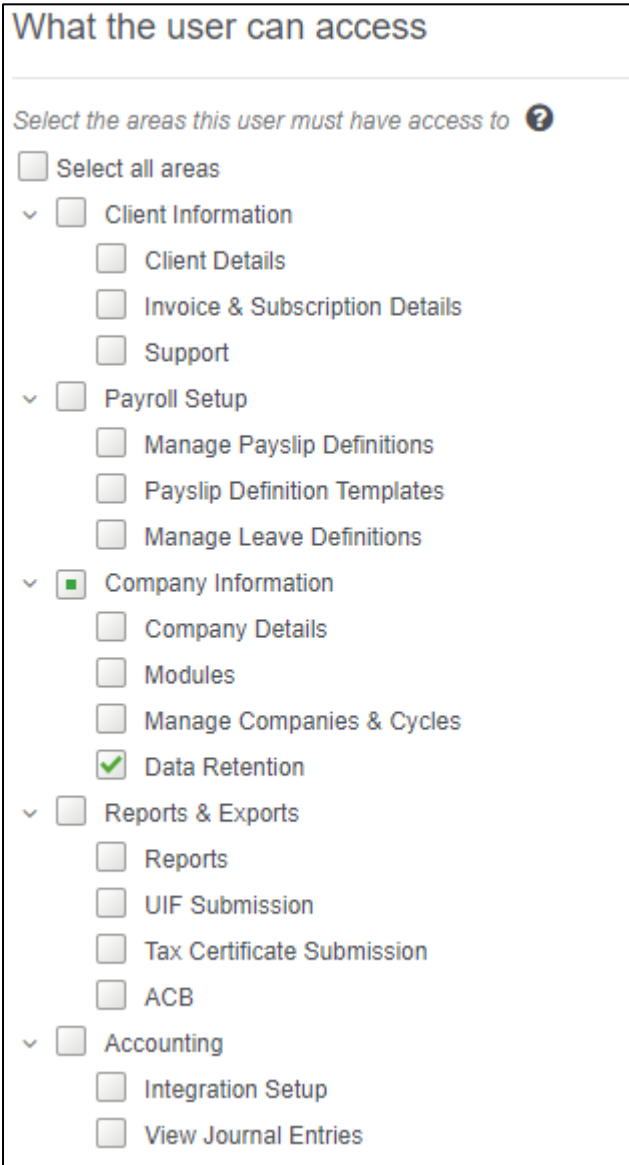
Export Name
UIF Declaration
EMP501 Txt Export
ACB Bank File Export

## 5. Controls & Data Management features in Sage Payroll relating to Personal Information

There are several aspects to the control and management of personal data within Sage Payroll. These are:

- a) Client Information restriction
- b) Payroll Setup restriction
- c) Company Information restriction
- d) Reports & Exports restriction
- e) Accounting setup & integration restriction

We have added a new Permission under Company Information restriction called Data Retention. Only the Administrator & Additional Users with the Data Retention permission allocated to them will be able to setup and manage the Data Retention settings.



**What the user can access**

Select the areas this user must have access to ?

- ☐ Select all areas
- ▼ ☐ Client Information
  - ☐ Client Details
  - ☐ Invoice & Subscription Details
  - ☐ Support
- ▼ ☐ Payroll Setup
  - ☐ Manage Payslip Definitions
  - ☐ Payslip Definition Templates
  - ☐ Manage Leave Definitions
- ▼ ☒ Company Information
  - ☐ Company Details
  - ☐ Modules
  - ☐ Manage Companies & Cycles
  - ☒ Data Retention
- ▼ ☐ Reports & Exports
  - ☐ Reports
  - ☐ UIF Submission
  - ☐ Tax Certificate Submission
  - ☐ ACB
- ▼ ☐ Accounting
  - ☐ Integration Setup
  - ☐ View Journal Entries

Figure 1: Data Retention Permission

## 6. Controls & Data Management requirements not accommodated by Sage Payroll

There are many features in Sage Payroll, and data management requirements outside of Sage Payroll, that Sage Payroll cannot control with respect to personal data. Here are some examples:

- The use of standard fields in Sage Payroll for purposes other than the purposes intended for those fields
- The security of data held in a report or data export generated from Sage Payroll
- Local area network access, controls and data protection
- Internet protection such as firewalls.

## 7. Data Retention

### 7.1 Setting Up Financial Retention Periods (First Time)

To help you manage your financial data at Sage, you should tell us how long you'd like us to keep your financial data. The data retention period is specified in terms of the number of tax years that you want to retain. We will **not** automatically delete old financial data at the end of the period, but we'll remind you to delete old data and confirm the number of tax years you would like us to keep your data for.

When logging in, the system will prompt the user setup the data retention period:

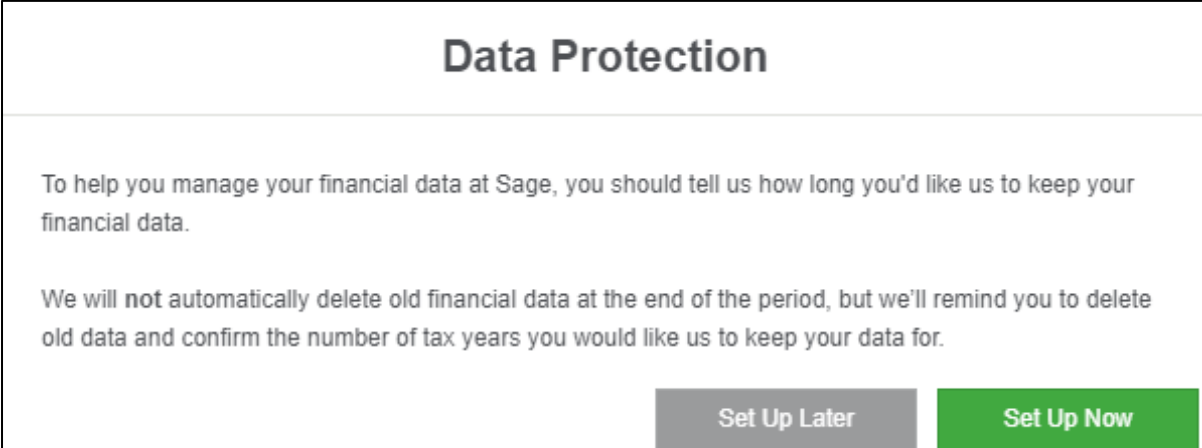
The screenshot shows a web interface titled "Data Protection". Below the title, there is a paragraph of text: "To help you manage your financial data at Sage, you should tell us how long you'd like us to keep your financial data." This is followed by another paragraph: "We will **not** automatically delete old financial data at the end of the period, but we'll remind you to delete old data and confirm the number of tax years you would like us to keep your data for." At the bottom right of the content area, there are two buttons: "Set Up Later" (a grey button) and "Set Up Now" (a green button).

Figure 2: Data Retention Setup Step 1

Sage Payroll allows you to setup a retention period:

- All companies at the same time (Step 3a)
- Each company separately (Step 3b)

Data Protection

I'd like to set my retention period for:

☐ All companies at the same time

☐ Each company separately

Cancel

Confirm

Figure 3: Data Retention Step 2

Data Protection

I'd like to set my retention period for:

☒ All companies at the same time

☐ Each company separately

Data Retention Period for All Companies

How long do you want to keep your data?

▼

tax years

Your local tax authority requires you to keep your payroll data for a minimum of 5 years. If you keep data for less than 5 years, you may not be able to provide the information they need.

Companies	Retention Period (Tax Years)	Retention Period End
Paint Inc	Tax Years	Month Year
Clean-It-All	Tax Years	Month Year
DST Construction Ltd	Tax Years	Month Year

Note

Write a note to remind yourself why you made the selection

Cancel

Confirm

Figure 4: Data Retention Setup Step 3a



During Step 3a:

- 1. Specify the amount of tax years that you want to keep your data – Keeping tax legislation into consideration.
- 2. Optionally capture a Note to remind you why you made the selection
- 3. Select the Confirm button

### Data Protection

I'd like to set my retention period for:

☐

All companies at the same time

☒

Each company separately

#### Data Retention Period per Company

Your local tax authority requires you to keep your payroll data for a minimum of 5 years. If you keep data for less than 5 years, you may not be able to provide the information they need.

Companies	Retention Period (Tax Years)	Retention Period End
Paint Inc	<div><div>3</div><div>▼</div></div>	June 2024
Clean-It-All	<div><div>4</div><div>▼</div></div>	June 2025
DST Construction Ltd	<div><div>5</div><div>▼</div></div>	June 2026

Note

Write a note to remind yourself why you made the selection

Cancel

Confirm

Figure 5: Data Retention Setup Step 3b

During Step 3b:

- 1. Specify the amount of tax years that you want to keep your data for each company – Keeping tax legislation into consideration.
- 2. Optionally capture a Note to remind you why you made the selection
- 3. Select the Confirm button

The system displays a confirmation of the Data Retention setup.

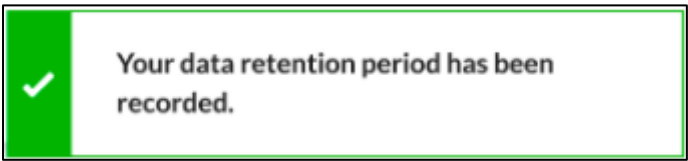


Figure 6: Data Retention Setup Step 4

## 7.2 Setting Up Financial Retention Period – Adding a new Company

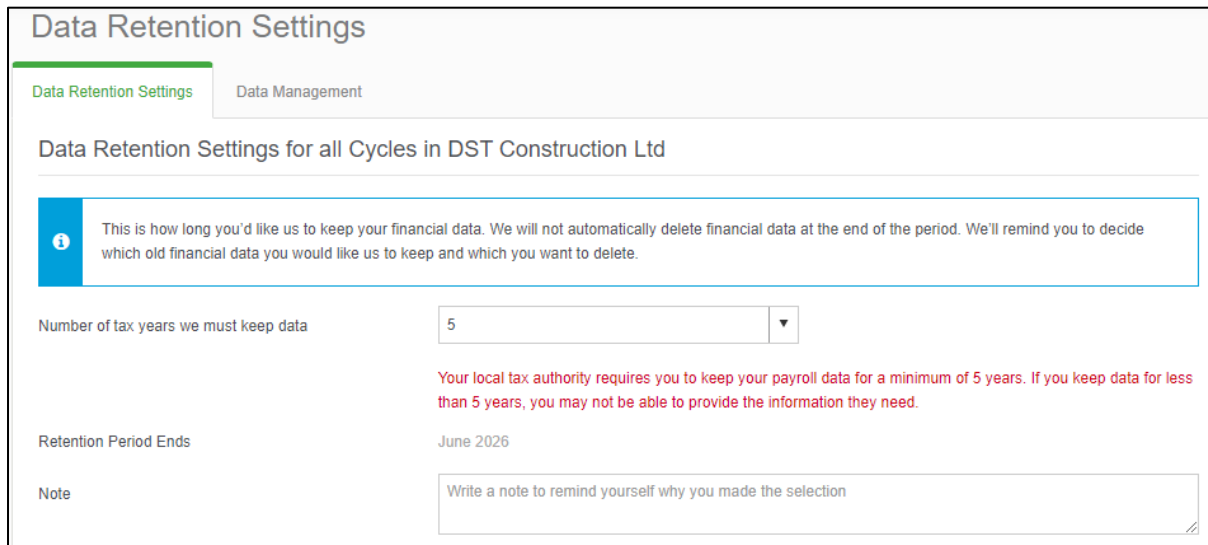
When adding a new company, the Add New Company process has been enhanced to capture the Data Retention Period:

The screenshot shows the 'Add New Company' form in Sage Payroll. The 'Data Retention Settings' tab is selected. A blue information box at the top states: "This is how long you'd like us to keep your financial data. We will not automatically delete financial data at the end of the period. We'll remind you to decide which old financial data you would like us to keep and which you want to delete." Below this, the 'Number of tax years we must keep data' is set to 5 in a dropdown menu. A red warning message reads: "Your local tax authority requires you to keep your payroll data for a minimum of 5 years. If you keep data for less than 5 years, you may not be able to provide the information they need." The 'Retention Period Ends' is set to 'June 2026'. A 'Note' field contains the text: "Keeping data for 5 years as per company policy".

Figure 7: Data Retention Setup - Add New Company

## 7.3 Updating Data Retention Period

An administrator can update the Data Retention Settings for a Company, by going to Data Retention Settings, under Company Settings:



The screenshot shows the 'Data Retention Settings' page for 'DST Construction Ltd'. The page has a header with 'Data Retention Settings' and 'Data Management' tabs. Below the header, it says 'Data Retention Settings for all Cycles in DST Construction Ltd'. A blue information box contains the text: 'This is how long you'd like us to keep your financial data. We will not automatically delete financial data at the end of the period. We'll remind you to decide which old financial data you would like us to keep and which you want to delete.' Below this, there is a form with three sections: 'Number of tax years we must keep data' with a dropdown menu set to '5'; 'Retention Period Ends' with the date 'June 2026'; and a 'Note' section with a text area containing the placeholder 'Write a note to remind yourself why you made the selection'.

**Data Retention Settings**

Data Retention Settings   Data Management

Data Retention Settings for all Cycles in DST Construction Ltd

**i** This is how long you'd like us to keep your financial data. We will not automatically delete financial data at the end of the period. We'll remind you to decide which old financial data you would like us to keep and which you want to delete.

Number of tax years we must keep data   5 ▼

Your local tax authority requires you to keep your payroll data for a minimum of 5 years. If you keep data for less than 5 years, you may not be able to provide the information they need.

Retention Period Ends   June 2026

Note   Write a note to remind yourself why you made the selection

Figure 8: Data Retention Settings

## 7.4 Audit Trail Report

The exiting Audit Trail report will reflect any changes made to the Data Retention settings, when it was made and who made the changes.

## 7.5 Retention Period Reached & Data Deletion

When the admin user or additional user (with Data Retention Permission) logs in, the system will notify the user that the Data Retention End Date has been reached. The system will keep on displaying the following message until a new retention period has been setup:

### Data Retention - End Date Reached

You have reached the end of your data retention period ( tax years) for Next submission test.

We did **not** automatically delete old financial data. To delete old financial data go to Data Retention under Company.

---

**New retention period**

How many tax years' data do you want us to keep?  tax years

Your local tax authority requires you to keep your payroll data for a minimum of 5 years. If you keep data for less than 5 years, you may not be able to provide the information they need.

Continue

Figure 9: Data Retention - End Date Reached

Please note, Sage Payroll does not automatically delete data for Active subscriptions. Financial data is deleted on-demand. An administrator can delete old financial data by going to the Data Management feature, under Company → Data Retention settings:

### Data Retention Settings

Data Retention Settings **Data Management**

Data Management for all Cycles in DST Construction Ltd

**i** This is where you decide which old financial data you would like us to keep and which you want to delete.

Number of tax years data (per cycle):		Manage Old Financial Data
Cycle	Period	Number of Tax Years
Monthly Salaries	March 2018 - February 2022	4 tax year(s)
Biweekly Wages	March 2018 - February 2021	3 tax year(s)
Weekly Wages	March 2015 - February 2017	2 tax year(s) <b>?</b>

Figure 10: Data Management

Selecting *Manage Old Financial Data*, shows the *Manage Old Financial Data* dialog:

Manage Old Financial Data

Enter how many tax years' financial data you want us to keep and we'll delete everything older.

Cycle	Tax Years to Keep	Periods to Keep
<input type="checkbox"/> Set all cycles		
Monthly Salaries	<div>4</div> <div></div>	tax years 4 tax years (2019 - 2022)
Biweekly Wages	<div>2</div> <div></div>	tax years 2 tax years (2020 - 2021)
Weekly Wages	<div>2</div> <div></div>	tax years 2 tax years (2016 - 2017)

Cancel

Continue

Figure 11: *Manage Old Financial Data – Tax Year Selection*

On the *Manage Old Financial Data* dialog, for each cycle, the user needs to specify the number of tax years to keep.

Selecting the Continue button, takes the administrator to the *Manage Old Financial Data Confirmation* dialog. The Confirmation Dialog specifies the Tax Years that will be retained as well as the Tax Years that will be deleted.

Manage Old Financial Data

You selected that we must keep old financial data of your cycles for the following number of tax years:

Cycle	Tax Years to Keep	Tax Years to Delete
Monthly Salaries	4 tax years (2019 - 2022)	0 tax years
Biweekly Wages	2 tax years (2020 - 2021)	1 tax years (2019)
Weekly Wages	2 tax years (2016 - 2017)	0 tax years

Cancel

Confirm

Figure 12: *Manage Old Financial Data - Confirm Deletion*

By selecting the Confirm button, the system displays a confirmation of the data deletion:

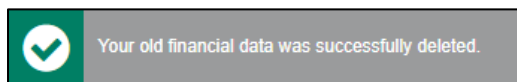


Figure 13: Financial Data Deletion Confirmation

## 7.6 Employee Record Obfuscation

If an employee requests that his data is deleted upon termination, the employee can request this from the Employer. The Employer can then log a support request with Sage Payroll Support to obfuscate the individual employee's record.

## 7.7 Account Cancellation

When cancelling your Sage Payroll subscription, you have an option to either delete all your data after 30 days, or to specify the number of years we should keep the data (should you need it in the future). The user will receive a confirmation email outlining his account cancellation request as well as the chosen data retention preference.

A screenshot of a web form titled "Account Cancellation". The form contains the following text: "Your request to cancel your account will be submitted to our Sales Operations department, who will contact you soon to process this request." Below this, it says "Please select your data retention preference when we cancel your account:". There are two radio button options: "I want Sage to keep my data for a certain number of years. ?" and "I want Sage to delete my data." At the bottom right, there are two buttons: "Cancel" and "Continue".

Figure 14: Account Cancellation - Data Retention Preference

Option 1: Keep the data for a certain number of years:

Account Cancellation

Your request to cancel your account will be submitted to our Sales Operations department, who will contact you soon to process this request.

Please select your data retention preference when we cancel your account:

☒ I want Sage to keep my data for a certain number of years. ?

☐ I want Sage to delete my data.

---

Please enter the number of years you want us to keep your Company, Employee and Financial data for:

Years to Keep

5

▼

 years

Cancel

Continue

Figure 15: Account Cancellation - Option 1

This option gives the administrator the option to specify how many years to retain the data in Sage Payroll. Selecting the Continue button, will display the *Account Cancellation Retain Data Confirmation* dialog:

Account Cancellation

We will keep your Company, Financial and Employee data for 5 years. After that, your data will be deleted.

Your feedback is important to us. We'd really appreciate it if you could **tell us more about your decision.**

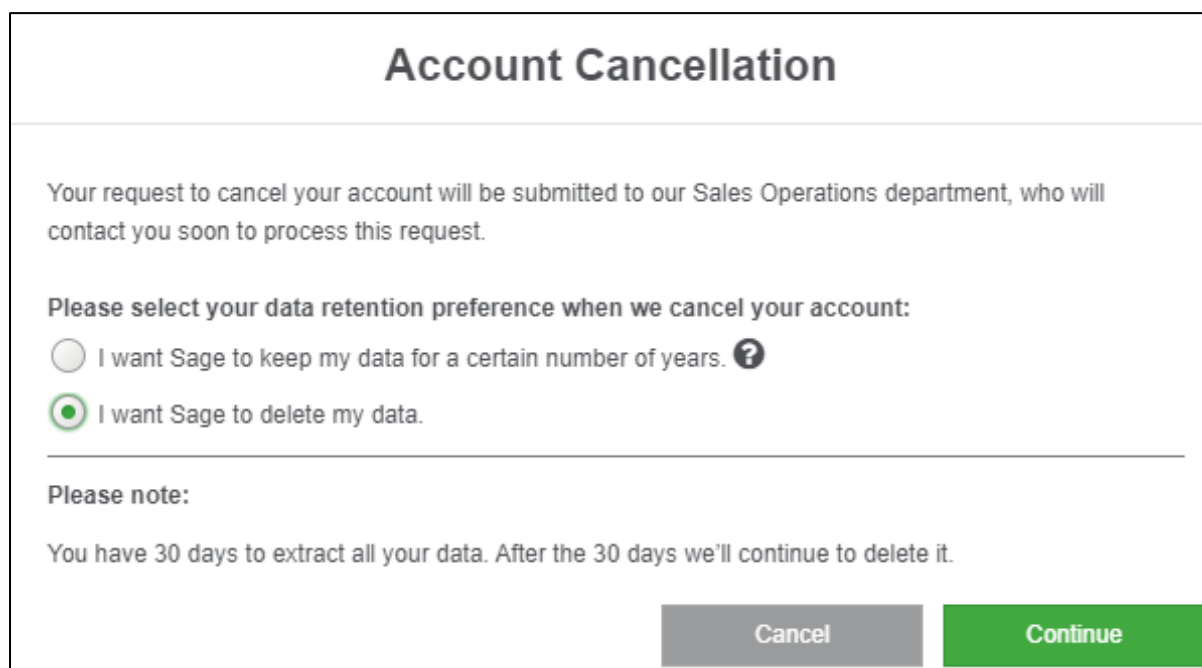
Cancel

Confirm

Figure 16: Account Cancellation Retain Data Confirmation

Once the Data Retention Period has been reached, we will automatically delete your all data. This is the only process that automatically deletes your data.

Option 2: Delete all data:



**Account Cancellation**

Your request to cancel your account will be submitted to our Sales Operations department, who will contact you soon to process this request.

Please select your data retention preference when we cancel your account:

☐ I want Sage to keep my data for a certain number of years. **?**

☒ I want Sage to delete my data.

---

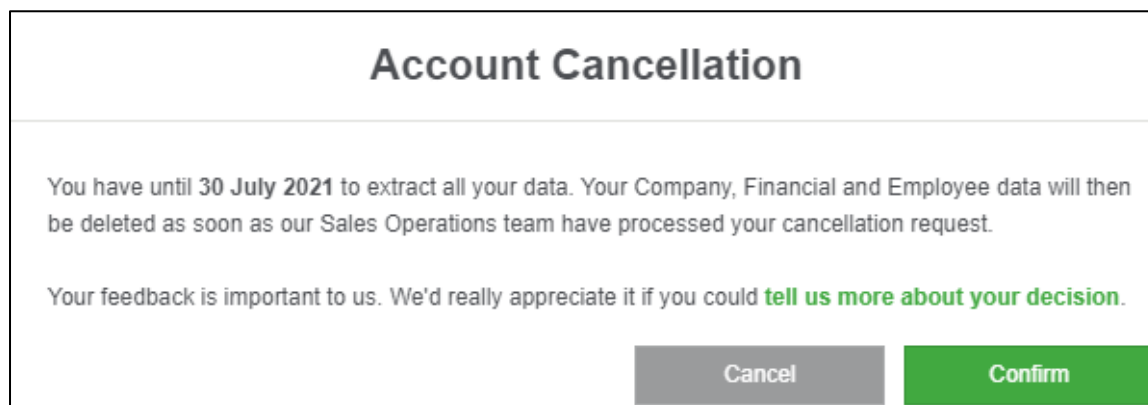
**Please note:**

You have 30 days to extract all your data. After the 30 days we'll continue to delete it.

**Cancel** **Continue**

Figure 17: Account Cancellation - Option 2

Selecting the Continue button, will display the *Account Cancellation Delete Data Confirmation* dialog:



**Account Cancellation**

You have until **30 July 2021** to extract all your data. Your Company, Financial and Employee data will then be deleted as soon as our Sales Operations team have processed your cancellation request.

Your feedback is important to us. We'd really appreciate it if you could **tell us more about your decision**.

**Cancel** **Confirm**

Figure 18: Account Cancellation Delete Data Confirmation

Once your subscription has been closed by our Sales Operations team, you will lose access to the Sage Payroll application. Your data will automatically be deleted, 30 days after the Account Cancellation request has been submitted.



## 8. Password Protection

As part of ensuring adequate access controls to Sage Payroll, it is important that users have complex passwords. This will prevent unauthorized access to the system and compromise personal data of the employees and company.

A password must comply with the following rules:

- More than 8 characters
- A mixture of upper and lower case letters
- One or more numbers
- No part of your email address

## 9. Suggestions regarding the management and control of Personal Information

This is not intended to be an exhaustive list of controls, processes and procedures that should be adopted by a Sage Payroll user in relation to personal data in Sage Payroll. The following are a guide, but each business needs to determine what is appropriate in their situation:

- Make use of the Additional Users functionality within Sage Payroll, to control the access of Sage Payroll operators with respect to Personal data.
- Make use of the System Audit Trail. Review System Audit Trail report regularly. This can highlight unauthorized access to Personal Data.
- Sage Payroll does **not** automatically delete financial data for Active subscriptions. It provides administrators with the necessary processes to setup retention periods. At the end of the retention period, the administrator is notified and can delete old financial data using the Manage Old Financial data deletion process.
- Ensure Data retention periods on any data subject isn't extended without just cause.
- Do not use any fields for a purpose other than it's intended use. Sage Payroll cannot protect personal data captured incorrectly in the system.
- Institute a process to take account of employees who leave the employ of the company. Sage Payroll does not automatically purge old/irrelevant employee data.
- Consider implementing the ISO 27001 standard in your business and IT processes, especially in relation to the management and control of personal information within Sage Payroll.



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Waterfall 5-Ir  
Midrand  
2066

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