The Article 9 check

Five questions for one follow-up routine and one purchased service. Set aside half an hour with HR or your data protection officer.

1. What is written down?

When a manager follows up an employee: is the measure recorded on its own, or is the reason (diagnosis, life stage, private matter) recorded too?

2. Was the reason necessary?

Can the measure be carried out without storing the reason? If so: why is it stored?

3. Where does it end up?

Which systems hold the information: notes, e-mail, HR system, payroll file, dashboard? Who has access, and when is it deleted?

4. What does the vendor collect?

Does the purchased service's login page load tracking before employees have consented? Do orders flow back to the employer in reports or payroll files?

5. Where is the boundary in writing?

Is there a published data boundary for individual follow-up, and a minimum group size for reports and surveys?

Would you rather we did the review? Write to hello@sydera.io or see sydera.io/en/article-9. The vendor never learns who asked.