

Data Protection Impact Assessment

Template for customers deploying MySalaryPal — Version 1.0

This template helps a Controller document a DPIA under Article 35 GDPR when rolling out MySalaryPal. It is pre-filled with information about the Service so you can focus on your own organisational context. Replace the bracketed sections with details specific to your deployment.

1. Description of processing

Multi-country payroll portal that ingests payroll output (payslips, YTD figures, tax codes), expense submissions, leave requests, RAMS acknowledgements and training records. Data is exposed to employees, line managers, HR, finance and admins under role-based access.

2. Necessity and proportionality

[Describe why you need each category of data and why the existing process (e.g. password-protected PDF emails) is unsuitable. MySalaryPal reduces email-borne payslip leakage and supports lawful fulfilment of employer information duties.]

3. Scope of personal data

Identifiers, employment, payroll, financial, technical. Special categories only if you choose to attach medical notes to leave requests. International transfers limited to sub-processors covered by SCCs (see Annex I of the DPA).

4. Stakeholders consulted

[List DPO, payroll lead, IT security, works council / employee representatives, and any union consultation.]

5. Risks identified

(a) Unauthorised disclosure of payslip to wrong employee — mitigated by RLS, RBAC and audit log. (b) Privileged-account misuse — mitigated by least-privilege, MFA, break-glass logging. (c) Sub-processor breach — mitigated by SCC, breach notification SLA. (d) Data residency expectations — mitigated by EU hosting and documented transfer mechanism.

6. Measures to mitigate risks

Refer to Annex II of the DPA. Customer-side: enforce SSO + MFA, configure role assignments, review the audit log quarterly, run access reviews.

7. Residual risk and sign-off

[Document residual risk rating (low / medium / high) and obtain DPO sign-off. Retain this DPIA for the lifetime of the processing and review on material change.]

8. Review schedule

[Annual, or on material change to the Service / scope.]

Sign-off

Role	Name	Date	Signature
Data Protection Officer			
Payroll lead			
IT / Security			