

Compliance Framework Briefing Note:

UNITED STATES & CANADA

Key local customer due diligence information to simplify your third party review process.

Sage Contacts

Global Privacy Office: globalprivacy@sage.com

California Residents: privacyrequest@sage.com



Sage takes the protection of Personally Identifiable Information (PII) and privacy extremely seriously; this includes complying with privacy legislation applicable to the United States and Canada.

United States

The [California Consumer Privacy Act](#) and the California Privacy Rights Act are the main data protection laws currently in effect in the US, as well as the [CAN-SPAM Act](#), and other applicable federal or state rules and regulations.

Canada

The Canada [Personal Information Protection and Electronic Documents Act](#) (PIPEDA) is the main data protection law in Canada, as well as [Canada's Anti-Spam Legislation](#) (CASL), and other applicable federal or provincial rules and regulations.

Sage data privacy compliance program

Key elements of the program include:

- appointing a Chief Data Protection Officer, supported by local legal counsel, a network of country data protection officers (where required) and [data protection champions](#) in the business to ensure awareness of data privacy requirements in all Sage teams.
- maintaining external facing privacy notices, including the [US](#) and [Canada sage.com privacy notice](#) and [privacy notice and data access form for California residents](#). Note that other Sage products, services, websites and applications may have their own privacy notices and cookie consent management which will be provided at the time of access.
- maintaining an internal [Personal Data Protection Policy](#); and other related procedures and guidance to ensure all Sage employees are aware of data privacy requirements.
- ensuring our agreements with customers, third party vendors and service providers contain [appropriate data privacy provisions](#).
- implementing processes to ensure a '[privacy by design](#)' approach, including [data privacy impact assessments](#) to ensure that adequate measures and standards exist to process PII lawfully.
- ensuring the [integrity and confidentiality](#) of PII by taking [appropriate, reasonable technical and organizational measures](#).
- responding effectively and in a timely manner to [PII breaches or incidents](#) and [requests from individuals](#).

- providing **data privacy training and communications** to employees to ensure awareness and understanding of our privacy obligations.
- undertaking **regular risk-based assessments** of Sage's compliance with data privacy requirements both internally and through engagement of external consultants.



Information security

Globally, Sage implements and maintains appropriate security measures for both PII and confidential corporate data. This approach includes mandatory security standards and controls, information security incident detection, investigation, and reporting mechanisms, and third party and software security review. Specific information security awareness training is provided to our colleagues.

International transfers

As Sage is a global company, in order to provide our websites, products and services to you, we may need to **transfer or access** your PII outside of the region within which you reside. This may be, for example, to **enable colleagues in different regions to help provide our products or services to you** where necessary, or to **enable our sub-contractors to assist us** with this.

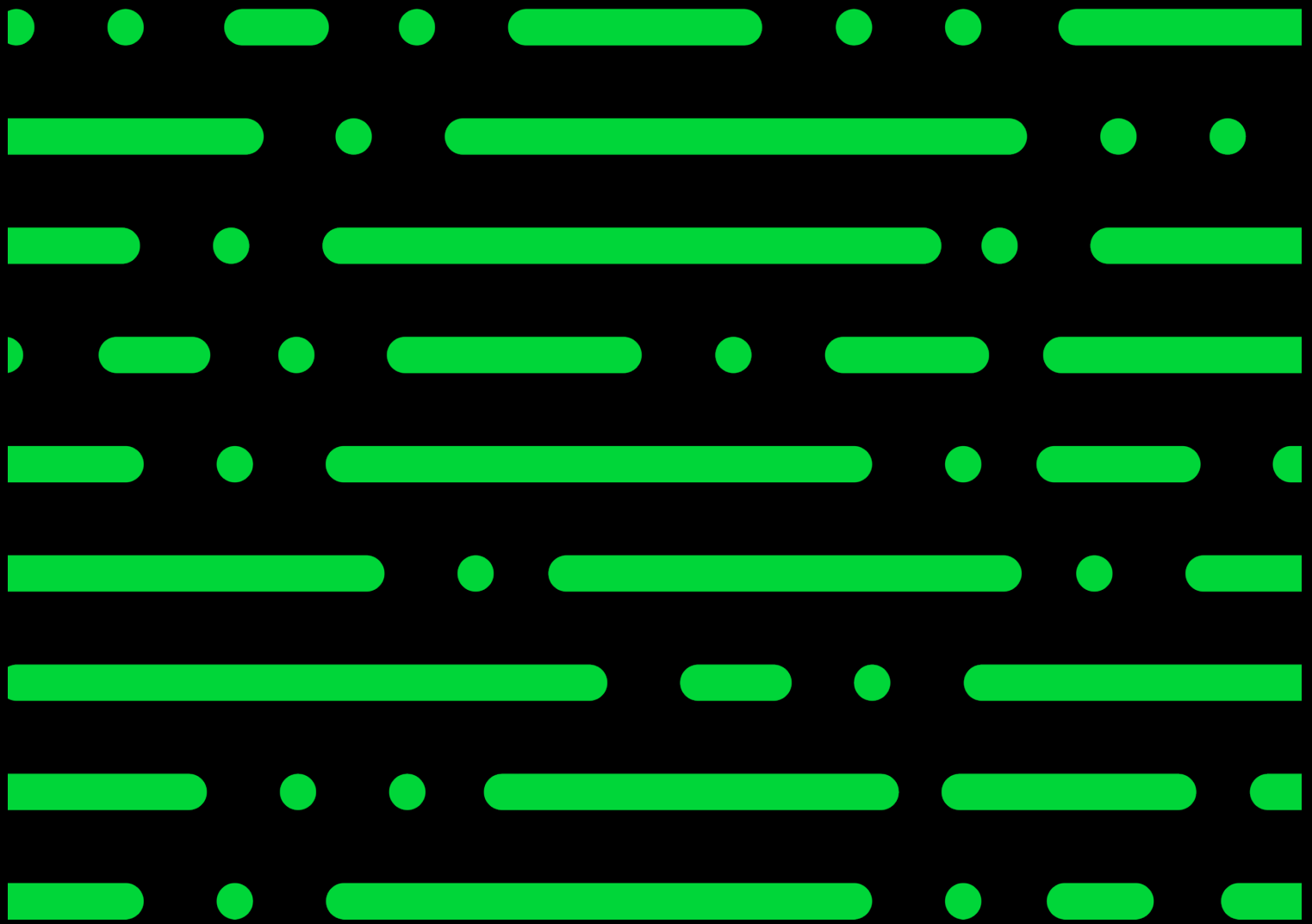
Sage relies on **appropriate lawful mechanisms** to transfer PII cross-border, where this is appropriate.

Direct marketing communications

If you would like to unsubscribe from Sage's direct marketing communications, you can do so [here](#) or contact globalprivacy@sage.com.

For any privacy questions, or to exercise your individual rights, contact globalprivacy@sage.com

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