Compliance Framework Briefing Note:

Asia-Pacific

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



Sage Contacts

Asia-Pacific Privacy: <u>dataprotection.apac@sage.com</u> Global Privacy Office: <u>globalprivacy@sage.com</u>

Sage takes personal data protection and privacy extremely seriously; this includes complying with privacy legislation applicable to countries in the Asia-Pacific (APAC) region.

Australia

The <u>Privacy Act 1988 (No. 119, 1988)</u> (as amended) is the main data protection law in Australia. The <u>13 Australian Privacy Principles</u> (APPs) are the cornerstone of the privacy protection framework in the Privacy Act 1988.

Singapore

The <u>Personal Data Protection Act 2012</u> (No. 26 of 2012) (PDPA) is the main data protection law in Singapore.

Malaysia

The <u>Personal Data Protection Act 2010</u> 'PDPA' 2013, and its subsidiary legislation (PDPA) is the main data protection law in Malaysia.

Sage personal data protection compliance programme

Key elements of the programme 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 the personal data protection requirements in all Sage teams.
- maintaining external facing privacy notices, including our <u>Australia</u>, <u>Malaysia</u> and <u>Singapore</u> sage.com privacy notices. Note 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 personal data protection requirements.
- ensuring our agreements with customers, third party vendors and service providers contain appropriate data protection provisions.



- implementing processes to ensure a 'privacy by design' approach, including data protection impact assessments to ensure that adequate measures and standards exist to process personal data lawfully.
- ensuring the integrity and confidentiality of personal data by taking appropriate, reasonable technical and organisational measures.
- responding effectively and in a timely manner to personal data breaches or incidents and requests from individuals.
- providing personal data protection training and communications to employees to ensure awareness and understanding of our obligations.
- undertaking regular risk-based assessments of Sage's compliance with personal data protection requirements both internally and through engagement of external consultants.

Information security

Sage implements and maintains appropriate security measures for both personal data 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 personal data 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-processors to assist us with this.

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

Direct marketing communications

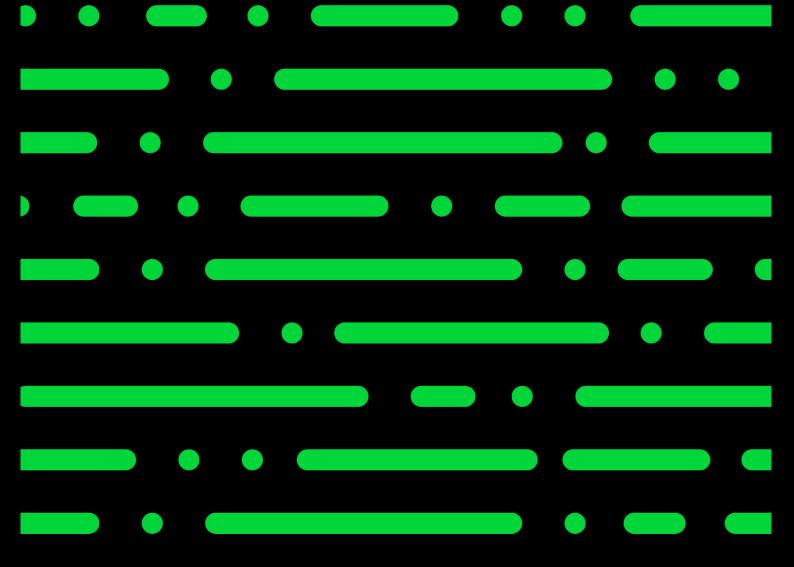
If you would like to unsubscribe from Sage's direct marketing communications, you can do so $\underline{\text{here}}$ or contact $\underline{\text{globalprivacy@sage.com}}$.

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







globalprivacy@sage.com

