

California Consumer Privacy Act ("CCPA")

25 July 2019



The California Consumer Privacy Act ("CCPA") is due to come into effect in January 2020 and applies to all for-profit businesses who meet certain requirements and hold or otherwise process personal information (including sole traders) of California consumers. The CCPA sets out the responsibilities of businesses in relation to: 1) the personal information they collect, hold, and sell; and, 2) the processes they use for managing that personal information.

Sage is actively working on its CCPA compliance strategy and has a project team, endorsed by the Sage Board, who are focused on Sage's strategy and implementation of the CCPA. In addition, Sage has robust governance procedures in place to manage preparations for the CCPA including a Data Governance Committee which is comprised of stakeholders from across the full Sage business to ensure Sage will be ready for the CCPA in January 2020.

As part of these preparations:

- Sage will review its existing comprehensive GDPR training program, aimed at all employees and other workers, to ensure they understand the basics of data protection law, to instil in them the nature and importance of personal information, to educate them to recognise and respond to subject access requests and learn how to report privacy breaches. Upon review, changes may be made to ensure the training program includes additional CCPA personal information management guidance;
- Sage has established a global incident reporting policy and supplementary procedures, supported by the Sage Risk team, enabling consistent rating and internal escalation (as required) of incidents, including those which may involve personal information;
- Sage's first line of defence is in the process of creating a comprehensive compliance program to enable tracking of its CCPA obligations, covering topics such as the sale of personal information, privacy notices, and processing records. The program is supported by Sage Compliance through the performance of regular compliance reviews, the facilitation of policy reviews and updates and an enterprise-wide data protection and information security training and awareness program;
- Sage has also established training and procedures on how to recognise and respond to consumer access requests, promoting the importance of identity checks and detailing how to respond to requests for data portability and the rectification and deletion of personal information; and
- Sage Legal will review the existing suite of inter-company Global Data Processing and Transfer Agreements, which incorporate GDPR requirements and include the use of the European Community Standard Contractual Clauses for transfers of data outside the EEA. These agreements facilitate the secure movement of personal data around the Sage group of companies while ensuring that all processing activities comply with the GDPR. Upon review, changes may be made to ensure processing activities comply with the CCPA.

Sage will be supporting customers—the small and medium sized businesses that drive all economies—and partners with:

- Innovation [via Products]: Sage is reviewing all products and supporting user documentation and, where appropriate, will release updates to the latest supported versions. Sage can help you meet some of your CCPA obligations through product development;
- Education [via Learning Services]: Sage will make educational courses available to customers, accountants, bookkeepers and partners on the CCPA through e-learning and virtual live instructor led training;
- Information [via Research and Guides]: Sage will develop research and thought leadership content in the form of blogs and more to help you better understand and get ready for the CCPA.

In addition, Sage understands that its products and services may form part of the controls and processes that businesses will implement in order to meet some of their own CCPA obligations. To support this, Sage is reviewing all products and supporting user documentation and, where appropriate, will release updates to the latest supported versions, so that clients who are running them will be able to incorporate these into their own compliance plans. In particular, further technological advances may be made to ensure we facilitate data portability, record keeping and the right to deletion as we update certain products as the program develops.

In the meantime, there is no substitute for customers seeking their own professional advice if they are unsure about the specific implications of the CCPA on their businesses.