

Compliance Framework Briefing Note:

SOUTH AFRICA

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

You can find more information on the Protection of Personal Information Act (POPIA), our Sage POPIA resources and Access to Information Manual for the Promotion to Access of Information Act 2 2000 (PAIA) [here](#) under the 'Sage POPIA Resources' section.

Sage Contacts

South Africa Privacy: privacyza@sage.com

Global Privacy Office: globalprivacy@sage.com



Sage takes data protection and privacy extremely seriously; this includes complying with South Africa's Protection of Personal Information Act ([POPIA](#)) and the [Regulations](#) Relating to the Protection of Personal Information. POPIA applies when you, as our customer, are domiciled in South Africa or are making use of automated or non-automated means of processing personal information in South Africa; POPIA does not refer to the offering of goods or services, or monitoring of individuals from abroad.

Sage personal data protection compliance programme

Key elements of the include:

- appointing a Chief Data Protection Officer ([Information Officer](#) under POPIA), 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 the [sage.com South Africa privacy policy](#) and [sage.com South Africa cookie policy](#). 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
- ensuring our agreements with customers, third party vendors and service providers contain [appropriate data protection provisions](#).
- maintaining [documentation](#) of all Sage personal information [processing operations](#) in accordance with Section 17 of POPIA.
- implementing processes to ensure a '[privacy by design](#)' approach, including [personal information impact assessments](#) to ensure that adequate measures and standards exist to process personal information lawfully.
- ensuring the [integrity and confidentiality](#) of personal information by taking [appropriate, reasonable technical and organisational measures](#).

- responding effectively and in a timely manner to **personal information breach incidents**, cooperating with any requests by the South African **Information Regulator** where required and supporting our customers with any notifications it is required to make to the Information Regulator as a Responsible Party.
- responding effectively and in a timely manner to **requests from individual data subjects** (including juristic persons), including the: right to access personal information; right to request deletion of their personal information; right to rectification or correction; and the right to object to processing in certain circumstances. Some requests, for example, deletion must be made in accordance with **Form 2** of POPIA.
- providing **data privacy training and communications** to employees to ensure awareness and understanding of our privacy obligations, including **specific training for functions which process sensitive or higher volumes of personal information**.
- 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 personal information 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 outside of your location

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 information outside of the region where you reside. For instance if you reside in South Africa or another location, this may mean we need to transfer your personal information to a different region, or allow access to it from a different region. 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 information cross-border, where this is appropriate.

Where Sage makes international transfers of personal information, Sage ensures that it complies with applicable data protection laws in respect of any relevant transfers.

Examples of safeguards we often implement include:

- completing **personal information impact assessments** where necessary on the processing of the personal information and the reason for the transfer;
- where the personal information is hosted in a third country, moving the personal information to a **local hosting centre where practicable**;
- implementing measures such as **pseudonymisation and encryption** where possible;
- inserting **robust data protection and transfer provisions** in contracts with group companies and third parties; and
- conducting thorough **privacy and information security due diligence on recipients**, including questions relating to requests for access to personal information by public or government authorities.

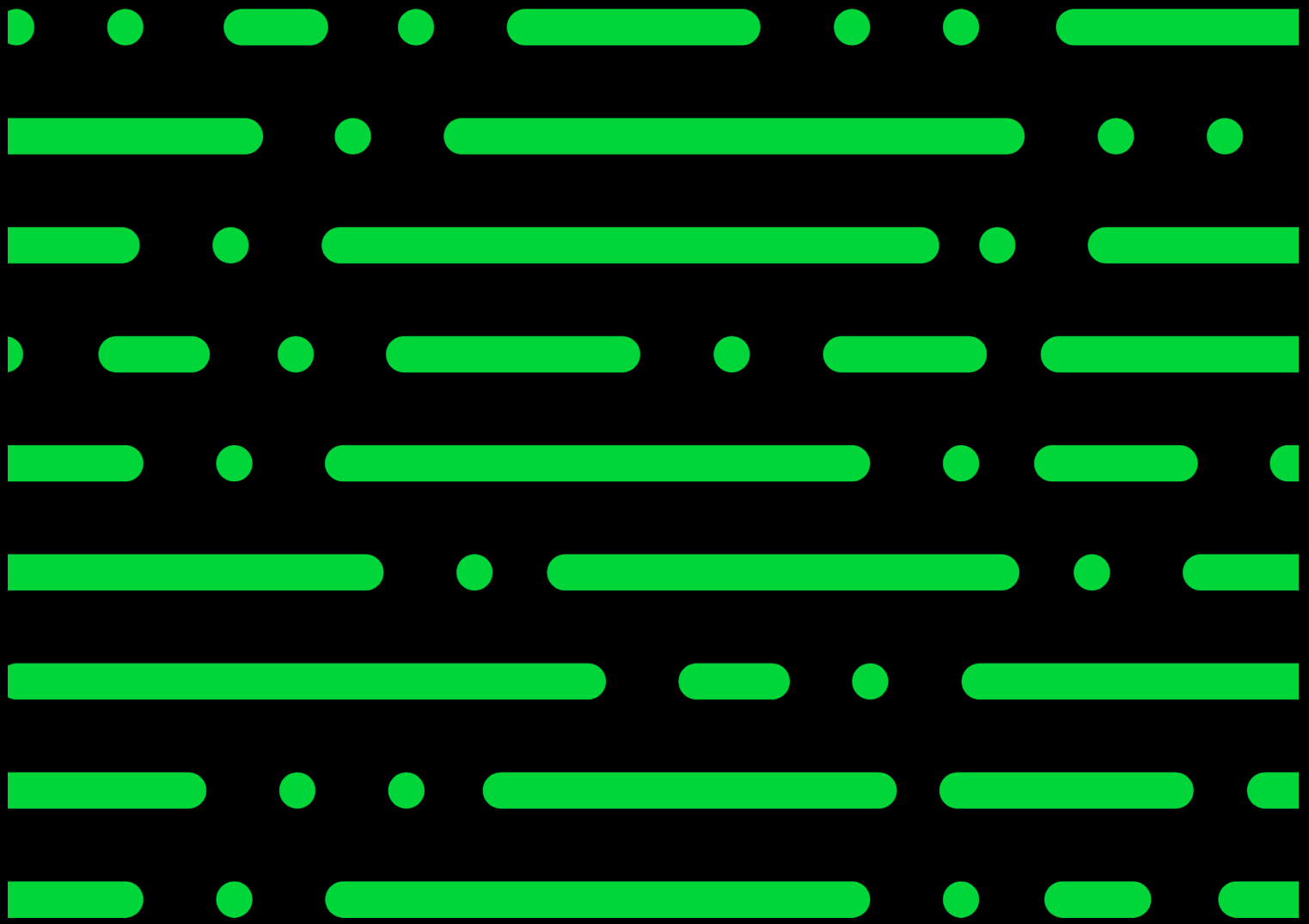
Sages continues to **monitor for any further developments** in this fast-evolving area to ensure that it remains compliant with applicable laws and regulations.

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 data protection questions, or to exercise your individual rights, contact globalprivacy@sage.com

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