

# Compliance Framework Briefing Note:

## UK & EUROPEAN UNION

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



### Sage Contacts

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Sage takes data protection and privacy extremely seriously; this includes complying with the General Data Protection Regulation (“GDPR”) and other applicable data protection laws.

### UK

The [UK GDPR and Data Protection Act 2018](#) form the primary data protection laws in the UK.

### EU

The [EU GDPR](#) is directly applicable in European Economic Area (“EEA”) member states and has extra-territorial effect for non-EEA data controllers that offer goods or services to individuals in the EEA or monitor their activities (for example, their use of online products or websites).

### Sage personal data protection compliance programme

Key elements of this programme include:

- appointment of a Chief Data Protection Officer, supported by local legal counsel, a network of country data protection officers, and [data protection champions](#) in the business to ensure awareness of data protection requirements in all Sage teams.

- maintaining external facing privacy notices and cookie policies, including the [Sage.com privacy notices and cookie policies](#). Note other Sage products, services, websites and applications have their own privacy notices and cookie consent management which will be provided at the time of access.
- maintaining an internal accountability framework and [Personal Data Protection Policy](#) which covers all GDPR principles, and other related procedures and guidance, to ensure that, with [regular training](#), all Sage employees understand requirements under the GDPR and other applicable data protection laws (e.g. fair and transparent processing, enabling individuals’ rights, cookie consents, marketing consents, data protection impact assessments, etc).
- ensuring our agreements with customers, third party vendors and service providers contain [appropriate data protection provisions](#) and comply with Article 28 of the GDPR.
- maintaining [records of processing activities](#) in line with Article 30 of the GDPR.
- 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 fairly and mitigate risks appropriately.

- ensuring the **integrity and confidentiality** of personal data by applying **appropriate, reasonable technical and organisational measures**.
- responding effectively and in a timely manner to **personal data breaches**, notifying competent data protection authorities, individuals and/or customers where required under data protection laws and/or our contractual obligations.
- Responding promptly to **individual right requests**, including the right of access; right to erasure; right to rectification or limitation; and the right to object to processing in certain circumstances (subject to applicable limitations and exemptions).
- providing **personal data protection training, and awareness campaigns and communications** to employees to ensure awareness and understanding of our obligations, including **specific training for teams which process sensitive or higher volumes of personal data**.
- 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 outside of the UK or EEA

As Sage is a global company, in order to provide our websites, apps, products and services to you, we may need to **transfer or access** your personal data outside of the region where 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 European Commission **adequacy decisions or other appropriate lawful mechanisms** to transfer personal data cross-border, where this is appropriate.

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

Examples of safeguards we implement include (where applicable):

- completing **transfer impact or risk assessments** where necessary;
- hosting personal data in a **UK or EU hosting centre** where reasonably practicable;
- implementing measures such as **pseudonymisation and encryption** where feasible;
- inserting **robust data protection and transfer provisions** in contracts with group companies and third parties, including **standard contractual clauses** where appropriate; and
- conducting thorough **privacy and information security due diligence on recipients**, including questions relating to requests for access to personal data by public or government authorities.

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

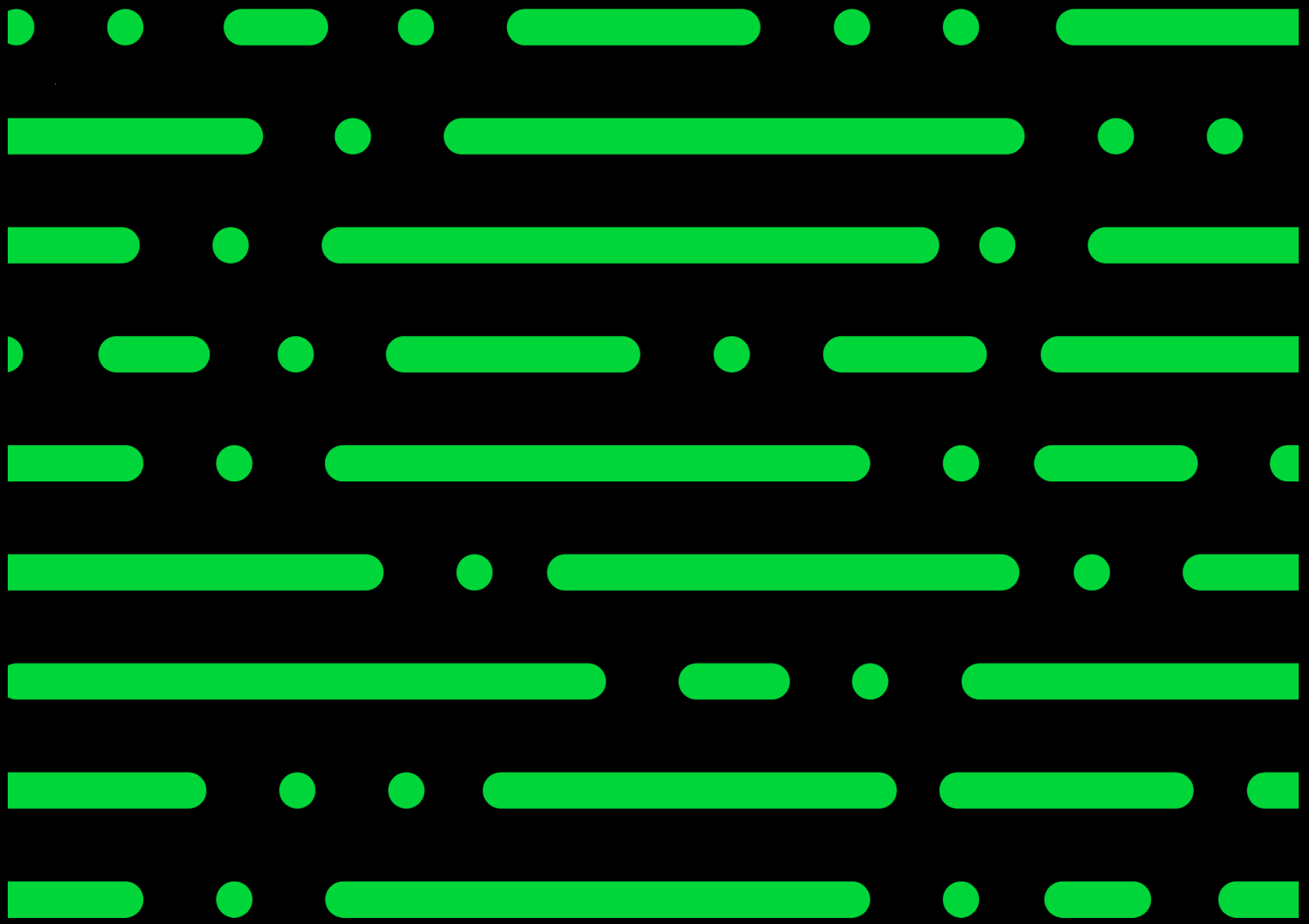
### Direct marketing communications

Sage collects **consent** where required before sending direct marketing communications, in line with applicable data protection laws.

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

**For any personal data protection questions, or to exercise your individual rights, contact [globalprivacy@sage.com](mailto:globalprivacy@sage.com)**

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