

General Data Protection Regulation

25 May 2018



The General Data Protection Regulation ("GDPR"), effective 25 May 2018, applies to all businesses who collect or otherwise process personal data (including sole traders). The GDPR sets out the responsibilities of businesses in relation to the personal data they collect and hold, and it also governs the processes businesses use for managing that personal data.

A Sage project team has been mobilised and actively working on its GDPR strategy and implementation for over a year, endorsed by the Sage Board. In addition, Sage has robust governance procedures in place to manage the implementation of GDPR including a Data Governance Forum which is comprised of stakeholders from across the full Sage business to ensure all areas of the Sage business are ready for GDPR.

As part of these preparations:

- Sage has appointed a Chief Data Protection Officer for the group, Chris Lauder, VP Risk and Assurance, who can be reached at The Sage Group plc, North Park, Newcastle upon Tyne, NE13 9AA or by email at globalprivacy@sage.com. Other country Data Protection Officers have been appointed where necessary.
- Sage introduced a comprehensive GDPR training program, aimed at all employees and other workers. This ensures they understand the basics of data protection law, instils in them the nature and importance of personal data, and educates them to recognise and respond to subject access requests, and report privacy breaches;
- Sage's internal Personal Data Protection Policy requires all new products and processes affecting personal data to undertake a Privacy Impact Assessment ("PIA") prior to launch in order to anticipate and minimise privacy risks and prevent intrusive behaviour. Where appropriate, these PIAs will be made available to clients;
- Sage has an established global incident reporting policy and supplementary procedures, supported by Sage's Risk team, enabling consistent rating and internal escalation (as required) of incidents, including those which may involve personal data;
- Sage's first line of defence is in the process of creating a comprehensive compliance program to enable tracking of its GDPR obligations, covering topics such as consents, privacy notices, processing records and privacy impact assessments. 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 also established training and procedures for employees on how to recognise and respond to data subject access requests, promoting the importance of identity checks and detailing how to respond to requests for data portability and the rectification and erasure of personal data;
- Sage Legal has introduced a suite of inter-company Global Data Processing and Transfer Agreements, which incorporate the requirements of the GDPR and include the use of the EC 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 whilst ensuring that all processing activities comply with the GDPR;

- Sage has introduced new Privacy Notices advising both customers and employees on how we use their personal data; and.
- Sage has updated its customer terms and conditions to reflect the requirements of the GDPR, which require greater contractual obligations to be placed on data processors.

In addition, Sage understands that its products and services may form part of the controls and processes that businesses will implement to meet some of their own GDPR obligations. To support this, Sage reviewed all products and supporting user documentation and, where appropriate, has released updates to the latest supported versions, so that clients who are running them can incorporate these into their own compliance plans. In particular, further technological advances have been made to ensure we facilitate data portability, record keeping and the right to erasure.

In the meantime, there is no substitute for customers seeking their own legal advice if they are unsure about the implications of the GDPR on their businesses. However, both the European Commission and the UK's Information Commissioner's Office (the "ICO") have already issued helpful guidance for GDPR compliance. Customers may be particularly interested in the data protection reform area of the [ICO website](#) and the publication, "[Preparing for the General Data Protection Regulation – 12 steps to take now](#)", which is also available as a pdf document.