

The General Data Protection Regulation ("GDPR") is due to come into effect in May 2018 and applies to all businesses who hold 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.

Sage is actively working on its GDPR strategy and has a project team who are mobilised and focussing on Sage's strategy and implementation of GDPR, which is endorsed by the Sage Board. In addition, Sage has robust governance procedures in place to manage the implementation of GDPR including a Data Governance Committee which is comprised of stakeholders from across the full Sage business to ensure all areas of the Sage business will be ready for GDPR in May next year.

As part of these preparations:

- Sage is introducing a 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 data, to educate them to recognise and respond to subject access requests and learn how to 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 established a 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 has also established training and procedures 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; and
- 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.

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 GDPR obligations. To support this, Sage is in the process of reviewing all its products and supporting user documentation, and 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 are being made to ensure we facilitate data portability, record keeping and the right to erasure as we update certain of our products as the program develops.

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.