

SAGE UNIVERSITY PRIVACY NOTICE

Last Updated: December 2019

1. About this Notice

This Privacy Notice ("**Privacy Notice**") sets out how we handle the personal information we collect about you ("**Personal Data**"). Please read this Privacy Notice carefully as it describes the types of Personal Data that we collect, the purposes for which we use it, the types of third parties with which we share it, and any rights you may have with respect to such Personal Data. Personal Data is information, or a combination of pieces of information, that allow you to be identified.

This Privacy Notice applies only when you visit the websites and online portals operated by us ("**Sage U**", "**Sage University**"), through which we make learning modules, subscriptions and methodologies available for purchase ("**Solutions**"), or when you contact us, for example with a comment, query or request for support in respect of Sage U or any Solutions. Other Sage services such as websites, products, services or applications may be covered by different privacy notices.

By using or accessing Sage U or contacting us, you agree that we may process your Personal Data as described in this Privacy Notice. Your use of Sage U and any information you provide through it is subject at all times to this Privacy Notice, the Sage U Terms of Use and Cookies Policy <http://sageu.com/legal/>.

If you are accessing and/or using Sage U on behalf of another person, company, entity or organisation whether in your capacity as an officer, director, employee, consultant, agent or otherwise) ("**Subscriber**"), you represent and warrant that you have the authority to act on behalf of the Subscriber and accept the terms of this Privacy Notice on behalf of the Subscriber, and for the purposes of these Terms "you" and "your" shall include such Subscriber.

Where you provide us with or we collect your personal information in any of the ways described in this Privacy Notice, you agree that we may collect, store and use it: (a) in order to perform our contractual obligations to you; (b) to comply with our legal obligations (c) based on our legitimate interests for processing (i.e. for internal administrative purposes, data analytics and benchmarking, direct marketing, maintaining automated back-up systems or for the detection or prevention of crime); or (d) based on your consent, which you may withdraw at any time, as described in this Privacy Notice.

2. Who collects and controls your Personal Data?

Unless, stated otherwise in this Privacy Notice, the data controller your Personal Data is:

- (i) Sage Global Services Limited, in respect of the operation and provision of Sage U; and
- (ii) the applicable Sage entity described the schedule to this Privacy Notice, where you purchase any Solutions,

and for the purposes of this Privacy Notice, "Sage", "we", "us" or "our" shall be construed accordingly.

The portals and websites which make up Sage U are hosted by Cornerstone OnDemand Inc (“**Cornerstone**”) on our behalf, who is a sub-processor of Sage in respect of any Personal Data it collects pursuant to this Privacy Notice <http://sageu.com/legal/>.

3. What Personal Data do we collect and how do we collect it?

We collect your Personal Data in three ways:

(i) Personal Data you voluntarily provide

- **Registration and account information:** If you register to use Sage U, set up an account and/or purchase Solutions, we will ask you to provide information such as your title, name, address, telephone number, Sage account number and email address.
- **Payments:** If you make payments for Solutions through Sage U, we will ask you to provide your payment information, such as your credit card number or bank account details so that we can process your payment.
- **Communications:** We may collect information you provide if you interact with other users through Sage U (for example, reviews of Solutions or participation in any forums). We may also collect information through your communications directly with us, for example, with our customer support team.
- **Enquiries:** If you make an enquiry or express an interest in respect of any Solutions, or request to be referred to a third party to make such an enquiry or expression of interest, we will ask you to provide information such as your title, name, address, date of birth, Sage account number, telephone number and email address.
- **Surveys:** If you voluntarily submit certain information to us by filling out a survey about Sage U, any Solutions, your user experience or otherwise, we will collect the information you have provided as part of that request.
- **Solutions:** If you purchase any solutions, we will retain information relating to which Solutions you have purchased, your progress and any associated results.

(ii) Personal Data we collect through your use of Sage U

We automatically collect certain technical information through your use of Sage U from device (e.g. your computer or mobile phone).

- **Device and Usage Information:** This includes information that is automatically generated as you use Sage U. This includes Personal Data such as your IP Address, information about the device or browser you are using to access Sage U, the website or URL you visited us from and the third party sites you visit when you click on links to exit Sage U.
- **Cookies:** When you use Sage U, we may send one or more cookies to your computer or use similar tracking technologies (“**Cookies**”). More information about our use of Cookies can be the Sage U Cookie Policy <http://sageu.com/legal/>. The collection of this Personal Data helps us to improve your experience and our services and ensure that you receive information that is most relevant to you.

(iii) Personal Data we receive from third parties

We may receive Personal Data from third parties depending on how you choose to interact with Sage U. Such Personal Data is then combined with Personal Data we already hold. We only use Personal Data supplied by a third party where we have checked that



these third parties either have your consent or are otherwise legally permitted or required to disclose your Personal Data to us.

4. Why do we process your Personal Data and on what legal basis?

The ways in which we may process your Personal Data and the legal basis' upon which rely on are set out below:

(a) Personal data which is necessary for the performance of the services we provide to you.

Services. We may use your Personal Data to deliver services to you or carry out transactions you have requested, including, but not limited to:

- (i) facilitating the use of Sage U;
- (ii) processing orders for Solutions;
- (iii) provisioning Solutions you have purchased to you;
- (iv) answering customer service requests;
- (v) displaying reviews, images and other content and media you submit to us or upload to Sage U; and
- (vi) maintaining and administering your account with us and ensuring it is kept up to date and is accessible.

Communications. We use your Personal Data to communicate with you, in accordance with your communication preferences. For example, we will use the email address you have supplied to contact you for information purposes such as account management, customer service, or system maintenance. In addition, Sage may use push notifications or your contact information to send information about your account.

(b) Personal Data which is necessary to comply with our legal obligations.

We may use your Personal Data to comply with our legal obligations, including compliance with applicable laws, regulations, requests from the government or other regulatory bodies or court orders.

(c) Personal Data which is necessary to meet our legitimate interests.

Analytics. We may also use your Personal Data to improve your experience of Sage U, Solutions and other products and/or services. We use such Personal Data to understand and analyse the usage trends and preferences of our users, to improve the way Sage U works and looks, and to create new features and functionality. For example, we may use to monitor gauge website performance and overall engagement of Sage U.

Fraud prevention and other infringements. We may use the personal information we collect to detect, prevent and respond to fraud, intellectual property infringement, violations of our terms and conditions, violations of law or other misuse of Sage U.

(d) When we have your consent;

Marketing. We may use Personal Data for marketing purposes, such as providing you with promotional or advertising materials that may be useful, relevant, valuable or otherwise of interest to you, in accordance with your marketing preferences, including customised third party advertisements, content and information. We may also monitor and analyse the effectiveness of such marketing activities. Where required under applicable law, we will obtain your prior opt-in consent to send you electronic marketing communications. You will have the ability to opt-out of receiving any such communications, either through unsubscribe links provided in communications, by updating your account preferences, or by contacting us using the contact details provided at the end of this Privacy Notice.

5. When is your Personal Data shared with or collected by third parties?

We share your Personal Data only where you ask us to, where it's a necessary part of doing business with you and providing you with the services, or where we need to for legal reasons.

We share your Personal Data with Cornerstone, who hosts Sage U on our behalf. Cornerstone is an independent controller in respect of Personal Data and processes such Personal Data pursuant to its own privacy notice hosted at <http://sageu.com/legal/>.

We share your Personal Data with providers of tracking tools and data aggregation and analytical software services (including Google Analytics) that enable us to carry out the 'Analytics' referred to in paragraph 4(c) of this Privacy Notice and to otherwise effectively monitor and optimise the delivery of our services.

We share your Personal Data with payment processors engaged by us to securely store and handle payments information, such as credit card and debit card details, required to purchase Solutions – for example. When you provide us with your credit or debit card details, we store these in a PCI-compliant data vault provided by a third party payment processor.

We share your Personal Data with Hands-On Learning Solutions, LLC (known as Virtual Labs) ("**Virtual Labs**"), who helps us deliver our products and services to you. Virtual Labs acts a sub-processor of Sage and any processing of Personal Data by it is subject to this Privacy Notice.

We share your Personal Data with Via Tech Publishing Solutions Limited ("**ViaTech**"), who helps us deliver our products and services to you. In respect of any Personal Data we share with ViaTech, it acts our sub-processor and any processing of Personal Data by it is subject to this Privacy Notice. However, if you elect to receive additional services from ViaTech, any processing of your Personal Data will be governed by its own privacy notice.

We also share your data with our other group companies, including The Sage Group plc and the companies set out in the schedule to this Privacy Notice.

6. How long do we store your Personal Data?

We may retain your Personal Data for a period consistent with the original purpose of collection (see the "**Why do we process your Personal Data and on what legal basis?**" section above). We determine the appropriate retention period for Personal Data on the basis of the volume, nature and sensitivity of your Personal Data processed, the potential risk of harm from unauthorised use or disclosure of your Personal Data and whether we can achieve the purposes of the processing

through other means, as well as on the basis of applicable legal requirements (such as applicable statutes of limitation).

Retention periods are set as a baseline, based on statutory/regulatory provisions and relevant limitation periods. They can be adjusted by Sage as needed to address local laws and regulations specific to individual countries. If deemed necessary by Sage, a review will be carried out at the end of the relevant retention period. The review will assess whether the information should be deleted as planned or further retained. Further retention may be, for example, the purpose of litigation or to meet another legal requirement.

If there is any data that we are unable, for technical reasons, to delete entirely from our systems, we will put in place appropriate measures to prevent any further use of such data.

For further information on applicable data retention periods, please contact us by using the information listed at the bottom of this Privacy Notice.

7. How do we keep your Personal Data secure?

Your Personal Data is important to us. We take organisational, technical and physical measures to help safeguard against the accidental or unlawful destruction, loss, alteration and unauthorised disclosure of, or access to your Personal Data.

While we take steps to protect your Personal Data, no method of storage or transmission is 100% secure. It is your sole responsibility to protect your password, limit access to your devices and sign out of Sage U after your sessions. If you have any questions about the security of Sage U, please contact us by using the information at the bottom of this Privacy Notice.

To ensure that we maintain high levels of security, we provide thorough data protection and data privacy training to all Sage employees. We aim to use and store the minimum amount of Personal Data possible, including the use of data minimisation techniques such as anonymisation and pseudonymisation. We also regularly conduct data privacy impact assessments (DPIAs) to ensure that we understand and reduce any risks associated with processing Personal Data.

8. Do we use cookies or similar technologies?

We use tracking code in Sage U to collect information to help deliver, optimise, personalise and analyse our services and for advertising purposes. Tracking codes are snippets of code placed in Sage U to measure things like visits, activities and transactions. Cornerstone also use cookies in Sage U to deliver Sage U to you.

Please see the Sage U Cookie Policy <http://sageu.com/legal/> for more information.

9. Do we transfer information internationally?

By using or accessing Sage U or contacting us and giving your information to us, you acknowledge and agree that your Personal Data may be collected in, transferred to and accessed by Sage, our group companies, suppliers, distributors and other business partners and/or agents located in countries outside of your country or residence. Please be aware that the privacy protections and legal requirements, including the rights of authorities to access your Personal Data, in some of these countries may not be equivalent to those in your country of residence. However, we will

take reasonable steps to protect your privacy and to provide a level of protection of personal information that is comparable to that of your country of residence.

Users Located in the European Economic Area (EEA)

Where required, we have put in place appropriate safeguards with our group companies, service providers, contractors, distributors and other business partners and agents to ensure that transfers of Personal Data outside the EEA are adequately protected. These safeguards typically comprise the EU Standard Contractual Clauses in accordance with Article 46(2) of the EU General Data Protection Regulation. For more information on the appropriate safeguards in place to protect your Personal Data, please use the contact details listed at the bottom of this Privacy Notice.

10. What are your choices and rights?

In respect of your Personal Data, you have the right:

- (a) to access your Personal Data held by us (right to access);
- (b) to rectify inaccurate Personal Data (right to rectification);
- (c) to erase/delete your Personal Data, to the extent permitted by applicable data protection laws (right to erasure);
- (d) to restrict our processing of your Personal Data, to the extent permitted by law (right to restriction of processing)
- (e) to transfer your Personal Data to another controller, to the extent possible (right to data portability);
- (f) to object to any processing of your Personal Data carried out on the basis of our legitimate interests (right to object). Where we process your Personal Data for direct marketing purposes or share it with third parties for their own direct marketing purposes, you can exercise your right to object at any time to such processing without having to provide any specific reason for such objection;
- (g) not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects ("**Automated Decision-Making**"). Automated Decision-Making currently does not take place on Sage U;
- (h) to withdraw your consent at any time, without affecting the lawfulness of the processing based on such consent before its withdrawal; and
- (i) to complain to the Information Commissioner's Office (ICO) if you are dissatisfied with how your Personal Data is handled by Sage. The ICO can be contacted in the following ways: By post, Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF; by telephone: 0303 123 1113 (local rate) or 01625 545 745 (national rate), or on their website, <https://ico.org.uk> which sets out email addresses and an email form.



Should you wish to make a request, withdraw consent or discuss any of the above in further detail, please contact us directly using the details provided in the “Contacting Us” section below.

11. Changes and updates to the Privacy Notice

Please revisit this page to stay aware of any changes to this Privacy Notice, which may be revised from time to time at our sole discretion. If we modify the Privacy Notice, we will make it available through the Services, and we will update the “effective date” at the top of this Privacy Notice. If the modifications materially alter your rights or obligations hereunder, we will notify you as may be required by law. This will be using the email address provided by you at the point of registration.

We encourage you to revisit these terms to stay updated and informed about our collection, processing, sharing and storing of your Personal Data.

12. Contacting Us

You can contact us at:

Sage Global Services Limited
Registered address:
North Park
Newcastle Upon Tyne
NE13 9AA
United Kingdom
UK Registered Company Number: 09506951
Email: globalprivacy@sage.com

THE SCHEDULE

SAGE ENTITIES

Your principal place of business	Sage entity	Address for notices
United Kingdom	Sage (UK) Limited (CRN: 01045967)	North Park, Newcastle upon Tyne, England NE13 9AA
Ireland	Sage Hibernia Limited (CRN: 300549)	One Central Park, Leopardstown, Dublin 18
Deutschland	Sage GmbH	Franklinstraße 61-63 60486 Frankfurt am Main Germany
Schweiz/Suisse	Sage Schweiz AG	Platz 10, 6039 Root D4, Switzerland
Austria	Sage GmbH	Stella-Klein-Low-Weg 15, 1020 Vienna, Austria
Poland	Sage sp. z o.o.	Aleje Jerozolimskie 132, 02-305 Warsaw
Spain	Sage Spain SL	Moraleja Building One - Planta 1 Parque Empresarial de La Moraleja

		Avenida de Europa no19, 28108 Alcobendas Madrid Spain
Portugal	Sage Portugal Software SA	Edifício Olympus II, Av. Dom Afonso Henriques, 1462, 4450- 013 Matosinhos, Portugal.
United States Caribbean countries (except French Caribbean) Latin and Central America Mexico	Sage Software, Inc.	271 17 th Street NW, Suite 1100 Atlanta, GA 30363
Canada	Sage Software Canada Ltd	120 Bremner Blvd., Suite 1500, Toronto, Ontario M5J 0A1, Canada
France	Sage SAS	10 Place de Belgique 92250 La Garenne-Colombes Paris France
Belgium	Sage SA	Buro & Design Center Esplanade 1 1020 BRUSSELS Belgium
Morocco	Sage Software	Tour Crystal 1 Niveau 9 Bd Sidi Mohamed Ben Abdellah Casablanca 20030 Morocco
South Africa Africa	Sage South Africa (Pty) Ltd	Sage Technology Park, 102 Western Services Road, Gallo Manor Ext 6, Johannesburg 2191 South Africa
Middle East	Sage Software Middle East FZ-LLC	Office 116-120 Building No.11 Dubai Internet City Dubai
Malaysia	Sage Software Sdn Bhd	Suite 1-B, Level 6, Block 1B, Plaza Sentral, Jalan Stesen Sentral 5, Kuala Lumpur Sentral, 50470 Kuala Lumpur, Malaysia
Singapore	Sage Software Asia Pte Limited	Asia Square, Tower 2, 12 Marina View, #25-02/03, 018961



Australia	Sage Software Australia Pty Ltd (ABN 40 071 007 326)	Level 11, The Zenith Tower B, 821 Pacific Highway, Chatswood, NSW 2067, Australia
Any country or region not mentioned above	Sage will notify you of the relevant Sage entity.	Sage will notify you of the address.