



Pearson

GDPR Readiness

European data protection legislation is soon to be significantly revised with the adoption of the General Data Protection Regulation (GDPR) in May 2018. Pearson is committed to meeting its obligations and has a GDPR Programme under way to ready the organisation for timely compliance with these additional rules. This will be a work in progress throughout 2017 and 2018 during which time our current data privacy procedures will continue to apply. The key areas of focus are:

- Privacy by design: we have developed a set of product privacy requirements so new products meet GDPR where required, and have reviewed legacy products to identify areas for improvement or remediation throughout 2017 and early 2018.
- Governance and Accountability: we are ensuring we have an effective governance framework alongside the right policies, procedures and records to demonstrate compliance. This will include data mapping, privacy impact assessments where relevant, and a solid risk management programme.
- Raising awareness: we will update our mandatory employee privacy training to reflect GDPR requirements, and will intensify our activities to educate employees throughout the organisation on our privacy values and obligations.
- Consents, notices and contracts: we are reviewing these to ensure they are updated to reflect new legal requirements.
- Transfers: we will continue to ensure any transfer of personal data from the European Economic Area (EEA) to a country outside the EEA is done on a legal basis, such as through explicit, informed consent, EU standard contractual clauses or where we can demonstrate legitimate interests.
- Incident response: we are reviewing our policy and processes to ensure we are ready for the new requirements and timescales to notify authorities and users of data breaches in certain circumstances.