



Pearson

GDPR Readiness

European data protection legislation has been significantly revised with the adoption of the General Data Protection Regulation (GDPR) from 25 May 2018. Pearson is committed to meeting its obligations and has implemented a GDPR Programme to address these additional rules. The key areas of focus are:

- Privacy by design: we have developed a set of product privacy requirements for products to meet GDPR where required.
- Governance and Accountability: we have implemented an effective governance framework alongside the right policies, procedures and records to demonstrate compliance. This includes a data inventory, data privacy impact assessments where relevant, and a solid risk management programme.
- Raising awareness: we have updated our mandatory employee privacy training to reflect GDPR requirements, and we have intensified our activities to educate employees throughout the organisation on our privacy values and obligations.
- Consents, notices and contracts: we are continually reviewing these to ensure they are updated to reflect new legal requirements, where necessary.
- 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: explicit, informed consent; EU standard contractual clauses; to a country which the European Commission has determined provides adequate protection for personal data; to a company which is registered under the US Privacy Shield Framework; or where we can demonstrate legitimate interests.
- Security of processing: Pearson's Information Security Strategy is built upon industry-recognised frameworks including ISO27001. Our security controls and risk management programme and processes are designed to implement appropriate technological and organisational measures to ensure a level of security appropriate to the risks so that Pearson aligns with Article 32 of GDPR.
- Incident response: we have reviewed our policy and processes in accordance with the new requirements and timescales to notify authorities and users of data breaches.

- Data Protection Officer: we have appointed a Data Protection Officer who can be contacted at: 80 Strand, London WC2R 0RL, United Kingdom or dataprivacy@pearson.com.

Data Privacy Office, 12 April 2018