

External Supplier Control Obligations Data Privacy

Control Title	Control Description	Why this is important
1. Permitted Purpose	Personal data is collected only where permitted by law and for a specified, explicit and legitimate purpose and not processed in a way incompatible with that purpose	Suppliers must follow ABSA's instructions so that personal data is only processed for its purposes or else ABSA violates laws in most countries where it operates resulting in severe penalties and damage to reputation
2. Appropriate Security	Appropriate measures are implemented so that personal data when stored, processed or transferred is protected against accidental or deliberate unauthorised disclosure, misuse or loss and is securely disposed of as required	Suppliers must appropriately protect personal data against accidental or deliberate unauthorised disclosure, misuse or loss to prevent damage to ABSA's clients, customers, and employees, and so that ABSA will not violate laws in most countries where it operates
3. Data Accuracy	Records containing personal data are kept accurate, updated when needed and identified errors are corrected	Suppliers must maintain accuracy of personal data so that ABSA can comply with legal requirements in most countries where it operates
4. Data Relevance and Retention	Personal data is relevant and not excessive in relation to the purpose and is kept only as long as necessary	Suppliers must follow ABSA's data collection and retention instructions so that ABSA does not violate laws in most countries where it operates
5. Effective Reporting	Effective mechanisms are implemented so that potential harm from unauthorised disclosure, misuse or loss of personal data or similar breach are detected, reported, managed and remediated promptly or sooner as agreed	Data security relies on a Supplier's timely and effective systems to detect, report, manage and remediate breaches which is often required of ABSA by applicable law but may have shorter deadlines for data incident reporting
6. Documented Standards	Annually updated data privacy policies and procedures based on applicable law are available to demonstrate organisational compliance with these requirements; are linked to proven contractual enforcement mechanisms; and are regularly communicated to all relevant staff	Updated policies and procedures with detailed individual roles and responsibilities are necessary to determine if Supplier performance meets ABSA's standards and if Supplier uses them to regularly communicate with staff and enforce them against staff who have contractual confidentiality and privacy obligations to comply with them during and after their employment
7. Privacy Awareness Training	Appropriate Privacy training and material is given to relevant staff to make them aware of data privacy requirements and documented standards	Training and material are necessary to create Supplier personnel awareness of their individual data processing roles and privacy responsibilities
8. Data Subject Requests	Requests from individuals identifiable from personal data are promptly notified and/or forwarded so that they can be acted upon to enable compliance with applicable law	Replying to or forwarding data subject requests for access to their personal data and for any other requests or complaints relating to ABSA's use of their personal data is necessary to comply with ABSA's legal requirements

9. Processing Changes	Personal data processing changes, including country location changes, are notified and agreed before change is implemented	Prior notification of, and ABSA's agreement to, any processing changes is essential to enable ABSA to comply with its legal requirements
10. Sub Processing	Proposed sub processors of ABSA's personal data are agreed in advance & subject to appropriate written subcontracts	Sub processors must be selected for their ability to conform with all privacy requirements and, after ABSA approves, their contracts must have appropriate provisions, including Data Transfer Agreements