

# External Supplier Control Obligations Data Privacy

Control Title	Control Description	Rationale
ACCOUNTABILITY	<p>The Supplier must be able to demonstrate it operates and maintains a Personal Information management framework with a clear structure and executive oversight that serves to protect personal information against loss or misuse and unauthorised access, disclosure, alteration and destruction.</p> <p>The Supplier will:</p> <ul style="list-style-type: none"> <li>i. ensure it has a Privacy Officer or similar post with whom Barclays can liaise</li> <li>ii. maintain and make available to Barclays appropriate policies and other documentary evidence demonstrating it operates effective measures governing its processing of Barclays personal information</li> <li>iii. demonstrate it reviews its personal information privacy framework on a regular basis</li> <li>iv. notify Barclays as soon as permitted if they become subject to a merger, acquisition or any other change of establishment or ownership</li> <li>v. assist Barclays in meeting any relevant statutory and regulatory compliance obligations in relation to the processing of Barclays personal data and in particular with the maintenance of records of processing, completion of Privacy Impact Assessments, and the exercise of individuals' rights</li> </ul>	<p>Accountability is a key privacy and data protection principle requiring organisations demonstrate their compliance with data protection and privacy law.</p>
STAFF AWARENESS, TRAINING & EMPLOYMENT CONTRACT	<p>The Supplier must provide mandatory privacy awareness training for all employees, contractors, and any other individuals with access to Barclays personal data/information.</p> <p>The Supplier will ensure:</p> <ul style="list-style-type: none"> <li>i. those involved (whether full time or part time and including short term hires, contractors, consultants, etc.) who have regular access to Barclays Personal Data are appropriately trained commensurate to their responsibilities in the roles performed</li> <li>ii. staff with access to Barclays personal data have made binding agreements to comply with data privacy/information security requirements</li> </ul>	<p>The supplier must be able to demonstrate the reliability of its staff and that it has measures in place to respect the confidentiality of personal data.</p>

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COLLECTION AND PROCESSING OF BARCLAYS DATA & CHANGES IN PROCESSING OF BARCLAYS PERSONAL DATA	<p>The Supplier will process Barclays personal data:</p> <ul style="list-style-type: none"> <li>i. only for the explicitly specified purpose(s) for which it was provided</li> <li>ii. in accordance with Barclays instructions, and in a manner compatible with any applicable law, rule or regulation, and with the contractual obligations</li> <li>iii. will not continue to hold or process Barclays personal data on end or termination of the contract unless that is specifically agreed to by Barclays or is mandated by law</li> </ul>	All processing, including if applicable the collection of personal data, must be fair and lawful
ACCESS TO PERSONAL DATA	<p>The Supplier will ensure:</p> <ul style="list-style-type: none"> <li>i. any further access to Barclays personal data, including any remote access involving substantive processing, is appropriately managed</li> <li>ii. restricted only to those necessary for provision of the service</li> <li>iii. Barclays Records are retained only in accordance with an agreed Record Retention Schedule.</li> </ul> <p>If the Supplier or any of its subcontractors (or third parties the Supplier provides Barclays data to) permit Barclays personal data or any sensitive information provided to the Supplier on a need to know basis, whether in physical or virtual form, to be accessed, shared or processed remotely, by any other third party or by its staff working from home, the Supplier will seek prior approval from Barclays for these arrangements.</p>	Controlling access maintains the confidentiality and security of the data
SECURITY	<p>The Supplier must maintain and protect Barclays personal data against accidental or deliberate unauthorised disclosure, misuse, or loss.</p> <p>The Supplier will</p> <ul style="list-style-type: none"> <li>i. report to Barclays immediately, upon identification or reasonable suspicion, any accidental or deliberate unauthorised disclosure, misuse, or loss of Barclays personal data likely to impact the privacy of individuals to whom the Barclays personal data relates. The report should include details of the incident, what data is affected and what action has been taken to mitigate the loss or breach</li> <li>ii. following an incident agree remediation actions with Barclays</li> </ul>	Data security is a fundamental principle found in data protection and privacy legislation requiring an assessment of information security risk and the implementation of appropriate controls.

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DATA TRANSFERS & JURISDICTIONS	<p>To afford a similar level of protection for Barclays Personal Data as provided by Barclays the Supplier will:</p> <ul style="list-style-type: none"> <li>i. ensure that these or similar contractual requirements and obligations are flowed down to third party Controllers and Processors to whom any Barclays Personal Data may be transferred</li> <li>ii. advise Barclays in advance of any sub-contractors or sub-processors receiving Barclays Personal Data</li> <li>iii. inform Barclays in advance of any changes to the jurisdiction(s) from where the service is or will be provided and of any other jurisdictions in which it or its subcontractors or sub-processors process Barclays personal data</li> <li>iv. in the event of any change ensure that applicable legal or regulatory requirements governing transfers of personal data from the originating Barclays jurisdiction are complied with, (for example where the originating jurisdiction is a European Union member state the conditions laid down in GDPR Chapter 5 must be followed where there are onward transfers of personal data to or from a third country).</li> </ul>	European and certain other privacy laws contain provisions governing transfers of personal data.
SUB-CONTRACTOR DUE DILIGENCE	<p>The Supplier:</p> <ul style="list-style-type: none"> <li>i. is responsible for the actions of the subcontractors it appoints and accordingly must carry out appropriate due diligence checks, assuring itself of their reliability and of the adequacy of their administrative, physical and technical controls relied on to maintain the security of the data.</li> <li>ii. will make Barclays aware of all subcontractors or sub-processors involved in the provision of the service and of any changes to these during the provision of the service</li> <li>iii. will ensure its subcontractors do not further process Barclays personal data in a manner that is incompatible with the purposes for which it was originally provided</li> </ul>	Barclays engages with the Supplier. The supplier is responsible for the actions of the subcontractors it appoints.