

External Supplier Control  
Obligation  
Data Privacy

Control Title	Control Description	Rationale
1. ACCOUNTABILITY	Supplier can demonstrate it operates measures (for example data protection impact assessments, records of processing etc.) compliant with the applicable legal and contractual obligations and that it reviews these on a regular basis	Accountability is GDPR data protection principle requiring organisations demonstrate their compliance with data protection and privacy law.
2. STAFF AWARENESS, TRAINING & EMPLOYMENT CONTRACT	Supplier ensures all its staff (whether full time or part time and including short term hires, contractors, consultants, etc.) with access to Barclays data are appropriately trained and have made binding agreements extending outside working hours and beyond end of employment to comply with data privacy/information security requirements	The supplier must be able to demonstrate the reliability of its staff and that it has measures in place to respect the confidentiality of the data
3. COLLECTION AND PROCESSING OF BARCLAYS DATA & CHANGES IN PROCESSING OF BARCLAYS PERSONAL DATA	The collection and processing of Barclays personal data is only for the explicitly specified purpose(s) for which it was provided and is carried out in a manner compatible with legal and contractual obligations	All processing, including if applicable the collection of personal data, must be fair and lawful
4. ACCESS TO PERSONAL DATA	Supplier ensures access to Barclays personal data is appropriately managed and restricted to those who require access in order to provide the service	Controlling access maintains the confidentiality and security of the data
5. SECURITY	The personal data is protected against accidental or deliberate unauthorised disclosure, misuse, or loss	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.
6. DATA TRANSFERS & JURISDICTIONS	Supplier ensures Barclays is advised in advance of all transfers and kept informed of the jurisdiction(s) from where the service is provided and of any other jurisdictions in which it or its subcontractors or sub processors process Barclays personal data	European and certain other privacy laws contain provisions governing transfers of personal data.
7. SUB-CONTRACTOR DUE DILIGENCE	Supplier ensures Barclays is informed about any subcontractors or sub-processors involved in the provision of the service who may have access to Barclays personal data, and confirms it has carried out appropriate due diligence checks on them, assuring itself of their reliability and of the	Barclays engages with the Supplier. The supplier is responsible for the actions of the subcontractors it appoints.

	adequacy of the administrative, physical and technical controls relied on to maintain the security of the data	
--	--	--