

External Supplier Control  
Obligations

Data Privacy

Control Title	Control Description	Rationale
<b>Collection and Processing of Barclays Data &amp; Changes in Processing of Barclays Personal Data</b>	<p>The collection and processing of Barclays data including 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.</p> <p>The Supplier will assist Barclays in meeting 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.</p> <p>The Supplier will process Barclays personal data:</p> <ol style="list-style-type: none"> <li>1. only for the explicitly specified purpose(s) for which it was provided</li> <li>2. in accordance with Barclays instructions and the contractual obligations, and in a manner compatible with any applicable law, rule or regulation</li> <li>3. 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> </ol>	<p>All processing, including if applicable the collection of personal data, must be fair and lawful</p>

<p><b>Data Transfers &amp; Jurisdictions</b></p>	<p>The supplier ensures Barclays is advised in advance of transfers out of the jurisdiction 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.</p> <p>An appropriate Data transfer agreement has been or must be put in place where any personal information is transferred out of the Jurisdiction.</p> <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>• 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>• advise Barclays in advance of any sub-contractors or sub-processors receiving Barclays Personal Data</li> <li>• 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>• 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>	<p>European and certain other privacy laws contain provisions governing transfers of personal data.</p>
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<b>Sub-Contractor Due Diligence</b>	<p>The 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 adequacy of the administrative, physical and technical controls relied on to maintain the security of the data.</p> <ul style="list-style-type: none"><li>• 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>• 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>• 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.
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