

# Union Jack Club

## Data Processing by External Suppliers

---

### 1. Scope

This procedure covers all situations where external suppliers are used by Union Jack Club to process personal data on its behalf.

### 2. Responsibilities

It is the responsibility of the Data Protection Officer (“DPO”) to approve all subcontractors used by Union Jack Club to process personal data on its behalf, according to the requirements of this procedure.

It is the responsibility of the owners of third-party relationships to ensure that all data processing by third parties is carried out according to the requirements of this procedure.

The third party relationship owner shall be assisted by the Deputy Chief Executive Officer with Quintech, who shall be responsible for providing technical and other assistance and resources to provide assistance.

Regular audits of third-party compliance shall be carried out by the Financial Controller or their appointed representative, who shall be responsible for them.

### 3. Procedure

Union Jack Club shall only engage with third party data processors that are able to provide security, including technical, physical or organisational security, to all personal data that they process on Union Jack Club’s behalf.

In addition to other circumstances set out elsewhere in this procedure, Union Jack Club shall only engage with third party processors outside of the EU in the following circumstances:

- When the third-party data processor has been identified positively in an EU Commission adequacy decision; or
- When the rights and freedoms of data subject are secured by legally binding corporate rules and other safeguards, agreed between Union Jack Club and the third-party data processor and are equal or equivalent to those afforded by the EU; or

- Where a specific arrangement between Union Jack Club and the third-party data processor has been approved by the Information Commissioner or the supervisory authority.

Before entering into any agreement with a third-party data processor, Union Jack Club must carry out an information security risk assessment.

Taking into consideration the basis of the nature of the personal data to be processed and the specific circumstances of the data processing, the DPO may deem it necessary that an additional audit of the third-party data processor's security arrangements may be carried out before entering into any agreement.

Union Jack Club shall only engage a third-party processor pursuant to a written contract which expressly sets out the service to be provided. The third-party processor is also required to provide suitable security for the personal data to be processed, which must also be confirmed in the written contract ("the data processing contract").

Union Jack Club is required to carry out regular audits of the third-party data processor's security arrangements throughout the duration of the contract, when the third party has access to personal data held by Union Jack Club.

The data processing contract must contain a clause preventing third-party data processors from hiring subcontractors for the processing of personal data in the absence of express, written approval by Union Jack Club.

Union Jack Club will only approve contracts with second-tier data processors, if the subcontractors of the third-party data processor agree to provide the same level of security and protection to the rights and freedoms of the data subject as those afforded by Union Jack Club. In addition, the contract between the third-party data processor and the second-tier data processors must contain a clause requiring that all personal data will be either destroyed or returned to Union Jack Club upon the termination of the contract.

#### **4. Document owner**

The Data Controller is the owner of this policy document and must ensure that it is periodically reviewed according to the review requirements contained herein.

The latest version of this policy document dated 1<sup>st</sup> March 2018 is available to all members and guests of Union Jack Club on the Club's website or for staff on the Club's Internet and will be included in the Club's training program undertaken by Heads of Department.

This policy document was approved by Union Jack Club's Board of Trustees and is issued by the Chief Executive Officer ("CEO") on a version controlled basis.

Name of CEO: Mr Simon Atkins

Date: 1st March 2018

**Change history record**

| <b>Issue</b> | <b>Description of Change</b> | <b>Approval</b> | <b>Date of Issue</b> |
|--------------|------------------------------|-----------------|----------------------|
| 1            | n/a                          | n/a             | n/a                  |
| 2            | n/a                          | n/a             | n/a                  |
| 3            | n/a                          | n/a             | n/a                  |