



Cognisco Ltd

Managing Sub-Contracted Processing

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Scope

All Sub Contracted suppliers of Cognisco Ltd who process personal data on behalf of Cognisco Ltd.

Responsibilities

It is the responsibility of the (Data Protection Officer / GDPR Owner) to ensure that either a Processor Contract or Controller Contract is implemented prior to any personal data sharing with Sub Contracting companies. The Sub Contracting company are liable for their processing of Cognisco Ltd's personal data in line with the Processor Contract or Controller Contract.

It is the responsibility of the (DPO) to ensure technical details relating to the contract are consistent with the GDPR Regulations covering, transfer, security and integrity of personal data.

It is the responsibility of the (DPO) to complete regular compliance audits of all processor contracts.

Procedure Statement

Cognisco Ltd / Data Protection Officer / GDPR Owner) only selects suppliers providing security of all technical, physical and organisational that satisfy Cognisco Ltd's criteria in terms of all the personal information they will process on behalf of Cognisco Ltd.

3rd Party providers from outside the EU Member States shall be subject to PIMS09. Transfer of Personal Data to Third Party Countries or International Organisations Procedure.

Legally binding corporate rules, and organisational and technical safeguards established between Cognisco Ltd and the 3rd Party providers to secure the rights and freedoms of data subjects at least equal to those afforded within the EU Member States or where arrangement has been approved by the Information Commissioner Officer (ICO).

A risk assessment of information security control ISO 27001 Annex A is completed prior to a 3rd Party contract is agreed. If the (Data Protection Officer / GDPR Owner) considers it necessary to complete an audit of the 3rd Party provider's security arrangements against the requirements of ISO 27001 standards, this will be conducted before entering the contract.

A clear written Processor or Controller Contract Agreement is required by Cognisco Ltd to ascertain transparent processing covering the security and integrity of Cognisco Ltd's personal data.

Within the Processor or Controller Contract Agreement, regular audits will be completed for all 3rd Party provider's security arrangements around the Cognisco Ltd personal data for the duration of the contract agreement. 3rd Party providers may not use further subcontractors without Cognisco Ltd's written authorisation for the processing of personal information.

Document Management

This document is valid as of January 2018.

This document is reviewed periodically and at least annually to ensure compliance with the following prescribed criteria.

- General Data Protection Regulation
- Legislative requirements defined by law, where appropriate

(Job Role)

(Author)

(Signature)