

DanceSyndrome Data Processing by External Suppliers

1. Scope

This procedure covers all situations where external suppliers are used by DanceSyndrome 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 DanceSyndrome 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 DPO, 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 DPO, who shall be responsible for them.

3. Procedure

DanceSyndrome 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 DanceSyndrome’s behalf.

In addition to other circumstances set out elsewhere in this procedure, DanceSyndrome 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 DanceSyndrome and the third-party data processor and are equal or equivalent to those afforded by the EU; or
- Where a specific arrangement between DanceSyndrome 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, DanceSyndrome must carry out an information security risk assessment.

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Company No: 8402154

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.

DanceSyndrome 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").

DanceSyndrome 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 DanceSyndrome.

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 DanceSyndrome.

DanceSyndrome 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 DanceSyndrome. 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 DanceSyndrome upon the termination of the contract.

4. Document owner

The DPO 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 is available to all employees of DanceSyndrome on the policies section of our the website.

This policy document was approved by DanceSyndrome's Board of Trustees and is issued by the Chairperson on a version controlled basis.

Date of implementation: April 2018

Date of next review: November 2018



Signed:

Sue Blackwell, Acting Chair – DanceSyndrome – 20.04.2018