HM Revenue & Customs

HMRC Tier 3 Model ICT Contract
Version 2.0 (April 2019)

SCHEDULE 2.8 | Data Processing and List of Sub-Processors

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INTRODUCTION

(a) Part A of this Schedule lists the types of Personal Data and categories of Data Subject which the Supplier will Process in its provision of the Services together with a description of the nature, purposes and duration of the Processing, the subject matter of the Processing, and the retention policy in respect of that data, and has been collated in accordance with Clause 23.2(a) and (b).

(b) Part B of this Schedule lists the Sub-Processors agreed by the Parties in accordance with Clause 23.5.

Part A | Data Processing

1. The Supplier shall comply with any further written instructions with respect to Processing by the Authority.

2. Any such further instructions shall be incorporated into this Schedule.

Description	Details
Subject matter of the processing	The Authority will commission with the Supplier to provide a confirmation of Payee (CoP) service. The Attribute Validation (AttVal) Team within Customer Insights Platform (CIP) provide the CoP checking service via the Bank Account Reputation Service (BARS). BARS is called by other applications and services run by the Authority and other governmental departments (OGDs). The subject of the data being processed is a check on an individual or organisation's bank account details, more specifically regarding the existence, status and capability.

Duration of the processing	The duration of the processing will be throughout the contract length from the effective date, up to three (3) years.
Nature and purposes of the processing	In order to validate that a bank account is accurate and 'fit for use' for the requesting service an API request is passed to The Supplier the COP check will take place and the confirmation, and any supplemental data, is passed back in a response. Information sent back from the supplier will allow the calling service or application to make relevant determinations based on that information. (NOTE: BARS will not make any decisions based on the response)
Type of personal data	**Personal data in the REQUEST sent to the supplier:** **AccountType** - Used to indicate whether the payer is intending to pay a personal or business account. Either "Personal" or "Business". **Identification** - The sort code and account number of the payee. Pattern: ^[0-9]{14}$ **Name** - The name of the payee as input by the payer. For personal accounts this is: "salutation, forename, surname" or "name". For joint accounts and business accounts only the format is "name". **Personal data in the RESPONSE sent to the Authority:** **Name** - Name returns the account name in the event of a close match in an unstructured string – mapped directly from ASPSP COP response. **Note:** *Other information necessary for the data exchange to take place including headers and security information are sent along with the REQUEST and RESPONSE but are not listed here as they are not 'Personal data'.*

Categories of data subjects	The bank accounts of customers, members of the public, businesses and clients that interact with HMRCs digital services. **NOTE**: Services that use HMRC Digital's Bank Account Reputation Service (BARS - the service that makes the calls to the supplier) would be responsible for what it logs and could potentially log and store this information, however it is expected be highlighted to the calling service (e.g. the OGD) during the onboarding discussions and platform readiness checks.
Plan for return and destruction of the data once the processing is complete UNLESS requirement under UK, EU or member state law to preserve that type of data	After the third year of the contract any data held by the supplier with regards to HMRC's usage of their service should be deleted or returned. This will be detailed in the Supplier's exit plan.

Part B | Sub-Processors as at The Effective Date

SurePay BV