

**TRADER SUPPORT SERVICE**

**SCHEDULE 11**

**PROCESSING PERSONAL DATA**

## 1 Processing Personal Data

- 1.1 This Schedule shall be completed by the Controller, who may take account of the view of the Processors, however the final decision as to the content of this Schedule shall be with the Authority at its absolute discretion. For the avoidance of doubt, any amendments to this Schedule may only be made pursuant to the Change Control Procedure.
- 1.2 The contact details of the Authority's Data Protection Officer are: *[to be provided]* [REDACTED] can be used as an interim contact
- 1.3 The contact details of the Supplier's Data Protection Officer are: [REDACTED], [REDACTED].
- 1.4 The Processor shall comply with any further written instructions with respect to processing by the Controller, subject to the Change Control Procedure.
- 1.5 Any such further instructions shall be incorporated into this Schedule.

Description	Details
Identity of Controller for each Category of Personal Data	<p><b>The Authority is Controller and the Supplier is Processor</b></p> <p>The Parties acknowledge that in accordance with Clause 23.2 to 23.15 and for the purposes of the Data Protection Legislation, the Authority is the Controller and the Supplier is the Processor of the following Personal Data:</p> <ul style="list-style-type: none"><li>Personal Data provided by end users of the Service and Personal Data provided by the Authority, in either case to the Processor or any Sub-processors pursuant to the provision of the Services by the Supplier under this Agreement.</li></ul>
Duration of the processing	From the Effective Date until the expiry of the Term or any extension to a Term.
Nature and purposes of the processing	<p>The Processor and its Sub-processors will process Personal Data for the purposes of delivering the Services described in Schedule 2.1 of this Agreement.</p> <p>More specifically, the Processor will use the Personal Data provided by traders registering with the Processor (or its Sub-processors) for the purposes of completing and submitting customs declarations on their behalf and providing educational/advisory services.</p> <p>Processing will include, but is not limited to, the following functions:</p>

	<p>a) collection through trader portal;</p> <p>b) recording (through contact centre);</p> <p>c) storage (cloud); and</p> <p>d) alteration/adaptation for submission of declaration into the Authority's CDS software.</p> <p>The Authority may provide Personal Data directly to the Processor to assist efficient provision of the Services. Such data will be considered Authority Data.</p>
Type of Personal Data	<p>Names, email address, business address, phone no., EORI/VAT no. of end users or potential end users of the Services.</p> <p>Authority Staff details (business phone number, business email, PID)</p>
Categories of Data Subject	<p>End users of the Services</p> <p>HMRC data subjects (staff)</p>
<p>Plan for return and destruction of the data once the processing is complete</p> <p>UNLESS requirement under union or member state law to preserve that type of data</p>	<p>The Processor, and its Sub-processors will be instructed to return and/or delete the Personal Data as per clause 23.5 (e) of this Agreement.</p>

## **Annex 1 to Schedule 11**

### List of Approved Sub-processors

#### Approved Sub-processors

- Institute of Export and International Trade
- EORI UK Limited
- Hinduja Global Solutions UK Limited
- ServiceNow UK Limited
- Amazon Web Services, US
- YourMembership.Com, Inc
- Descartes Systems UK Limited
- Microsoft Limited
- Amazon Web Services, UK
- Fujitsu Technology Solutions Spzoo
- Interxion Nederland B.V.
- CenturyLink Communications Belgium SA