

## Data Processors – Due diligence enquiries

*General enquiries to be raised prior to engagement with a third party data processor to ensure they can comply with data protection law in relation to the proposed data processing activities.*

The Midcounties Co-operative is committed to complying with all applicable laws; in particular those relating to the processing of personal data. Accordingly, we would be grateful if you could please supply the responses and supporting documentation and information requested below so that we can assess the extent to which you comply with data protection laws.

Question	Response
<p><b>Contact details.</b> Please confirm the name and contact details of the data processor.</p>	
<p><b>Data Protection Officer.</b> Please confirm the name and contact details of your Data Protection Officer (if any).</p>	
<p><b>Notification.</b> Please provide a copy of the Company's data protection notification with the Information Commissioner's Office, or any pending notification, and confirm that the Company does not carry out any personal data processing other than in accordance with its current notification.</p>	

Question	Response
<p><b>Certification.</b> Please provide copies of any certificates the Company has in order to demonstrate compliance with data protection law, including the General Data Protection Regulation, and any data security standards.</p>	
<p><b>Policies and Procedures.</b> Please provide copies of all data protection policies and procedures (including the Company's data security and data retention and destruction policies) and confirm that the Company carries out personal data processing in accordance with such policies and procedures.</p>	
<p><b>Data transfers.</b> Please confirm whether the Company proposes to transfer the personal data to a third party and, if so, to whom. Please confirm whether the Company proposes to transfer the personal data outside of the European Economic Area. If so, please describe the arrangements in place to safeguard individual's data privacy.</p>	
<p><b>Data security.</b> Please describe the technical, physical and organisational security measures in place to protect the personal data. Please confirm that such measures are appropriate having regard to the risks presented by the processing and the nature of the personal data to be protected. Does the Company propose to use cloud computing technology or services in relation to the personal data?</p>	

Question	Response
<p><b>Sub-processors.</b> Please confirm whether you intend to appoint sub-processors to process the personal data. If so, please provide details.</p>	
<p><b>Enforcement action and complaints.</b> Please confirm whether any enforcement action (including fines) has been taken against the Company by the Information Commission or any other regulator or body or by any data subject and whether there are any actions threatened or pending in connection with the Company's compliance with data protection laws.</p>	
<p><b>Training.</b> Please describe your arrangements for training staff relating to data protection compliance.</p>	