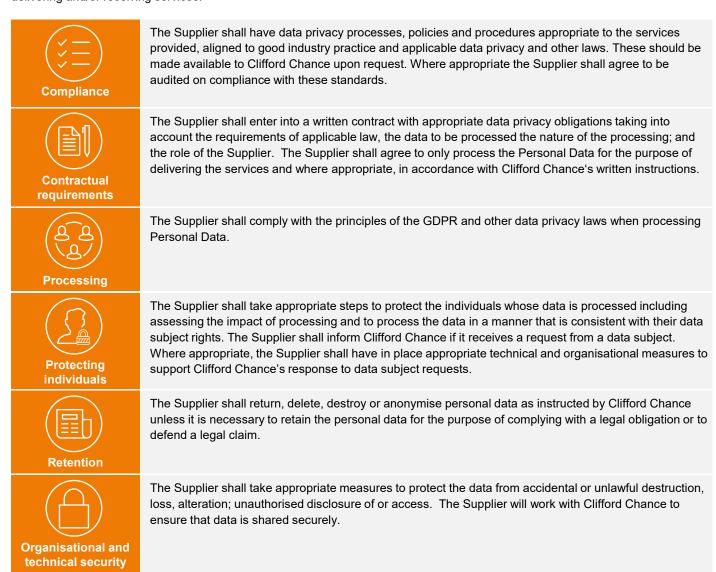


DATA PRIVACY

Our suppliers are expected to reflect and support our commitment to the protection of Personal Data and respect for individual privacy rights. This section outlines the standards Clifford Chance expects whenever Personal Data is exchanged in the context of delivering and/or receiving services.



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DATA PRIVACY

(CONTINUED)



The Supplier shall not transfer personal data outside of the relevant region unless there is adequate protection for the rights and freedoms of individuals in relation to their personal data. Where necessary, the Supplier shall execute additional contractual commitments and assist with transfer impact assessments, as required by Clifford Chance, to ensure compliance with restrictions on the international transfer of personal data.



The Supplier shall give Clifford Chance notice of any personal data breach or other incident prejudicing the security of personal data relating to Clifford Chance people or clients without undue delay. Where the Supplier acts as a Data Processor, the Supplier will work with Clifford Chance, where required to do so, to support the mediation and reporting of the breach.



The Supplier shall exercise appropriate due diligence when working with sub-processors and ensure that appropriate contractual controls are in place to protect personal data. Where sub-processors are appointed, the contract will include appropriate terms regarding the processing of personal data.



The Supplier will conduct appropriate due diligence when hiring new employees and contractors.

All Supplier employees with access to personal data should be informed of the data protection requirements applicable to their role and be expected to commit to appropriate confidentiality terms.



"Data Subject" means a natural person whose personal data is processed by a data controller or processor.

"GDPR" means the General Data Protection Regulation (EU) 2016/679, including any applicable amendment, re-enactment or replacement of it from time to time.

"Personal Data" means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

"Privacy Impact Assessment" means an assessment of the impact of a process or system involving the accessing, processing, storing, creating or transferring of personal data.

"Processing" means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

"**Transfer**" means any transfer or disclosure of personal data, by any means, including by post or courier, by electronic transmission or by making available for download.

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C L I F F O R D C H A N C E

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