

# Appendix 2: Additional data processor(s)

Use this form if your project involves additional data processors to the processor named in section H.

Repeat the content of the form for each distinct entity that will operate as a data processor under written instruction.

Primary applicant (as named in section A1 of the UKHSA Data Application Form):	
Applicant organisation (as named in section A2 of the UKHSA Data Application Form):	
Project title (as indicated in D1.2 of the UKHSA Data Application Form):	

### H4: Additional data processors

Under UK GDPR Article 4(2) 'processing' is described as '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'. Article 4(8) of UK GDPR goes on further to describe a 'processor' as 'a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller'.

It is important to remember that processing the data includes any bodies which touch the data in any way as part of the project. This may include situations such as:

- cloud hosting arrangements to securely store the data
- a specialist organisation instructed to support the distribution of surveys or invitation letters to participate in a study
- third-party analysis, consultation or interpretation of data

Where there is more than one data processor (or a processor has instructed a sub-processor), you must submit this Additional data processor(s) form with your application. The total number of Additional data processor forms will depend on the data management practices within your project and must align to the linear data flow diagram. All applications must be accompanied by a logical data flow diagram to visualise the information flows within the proposed systems, any processes and interaction points between any external and internal parties.

Before completing this form, you are asked to familiarise yourself with the pre-application guidance, including Approval Standards.

- H4.1: Data processor name
- H4.2: Registered address

H4.3: State the written instruction provided by the Applicant(s) to the additional data processor

### H5: Data processing agreement with data processor

You must execute a data processing agreement (a type of contract) with each data processor. This contract must bind the data processor to the data controller in respect of its processing activities, as specified in the application.

## H6: Organisational and technical safeguards of the data processor to process the data

The Data Protection (Charges and Information) Regulations 2018 requires every organisation that processes personal information to pay a fee to the Information Commissioner's Office (ICO), unless they are exempt. You must evidence this is satisfied.

H6.1: ICO Fee Payers Register registration number

H6.2: Registered organisation name

H6.3: Registration expiration date

You must demonstrate that the data processor has appropriate technical and organisational measures to protect the confidentiality, integrity and availability of the data requested (including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage).

UKHSA accepts two types of assurance as evidence:

- a valid Data Security and Protection Toolkit to 'Standard Met' or 'Standard Exceeded'
- a current ISO 27001:2013 certificate issued by an UKAS accredited certification body. You must provide the primary applicant with a copy of the certificate for inclusion in the application

#### H6.4: Security assurance (provide one of the following)

Data Security and Protection Toolkit. If selected complete questions A6.5a-c

ISO27001:2013 certificate. If selected complete questions A6.6a-c

Data Security and Protection Toolkit	ISO 27001:2013 certification
H6.5a ODS code	B6.6a: Certificate number
H6.5b: Latest standard attained	H6.6b: Initial registration date
H6.5c: Version assessed against	H6.6c: Current expiry date

H6.7: Territory of processing of primary applicant, where other describe.

### Processing your data

UKHSA will use the personal information you provide in this form and any supporting evidence to consider your application. Further information on how we collect, hold, and process your information can be found at: https://www.gov.uk/guidance/processing-your-personal-data-for-secondary-purposes