

SUBCONTRACTORS and THIRD PARTY PROCESSORS

1. SCOPE

All external suppliers that process personal data on behalf of Kinetic Solutions are within the scope of this procedure.

2. RESPONSIBILITIES

- 2.1 The Data Protection Officer is responsible for approving the selection of all sub-contracted processors of personal data in line with the requirements of this procedure.
- 2.2 The owners of third-party relationships are responsible for ensuring that all data processing is carried out in line with this procedure.
- 2.3 The Head of IT is responsible for ensuring that adequate technical and other resources that might be required are made available to support the relationship owner in the monitoring and management of the relationship.
- 2.4 The Head of IT is responsible for carrying out regular audits of third-party compliance.

3. PROCEDURE

- 3.1 Kinetic Solutions selects only suppliers that can provide technical, physical and organizational security that meet Kinetic Solutions's requirements in terms of all the personal information they will process on Kinetic Solutions's behalf.
- 3.2 Suppliers from outside the EU will only be selected under the following conditions, in addition to the conditions noted elsewhere in this procedure.
 - 3.2.1 If the supplier or the state in which it resides has been positively identified in an adequacy decision by the EU Commission; or
 - 3.2.2 Where there are legally binding corporate rules, and organizational and technical safeguards, established between Kinetic Solutions and the supplier to secure the rights and freedoms of data subjects at least equal to those afforded within the EU; or
 - 3.2.3 Where the arrangement has been approved by the Information Commissioner.
- 3.3 An information security risk assessment, taking into account the information security controls of ISO 27001 Annex A, is carried out before a supplier is engaged and, if the Data Protection Officer considers it necessary because of the nature of the personal information to be processed or because of the particular circumstances of the processing, an audit of the supplier's security arrangements against the requirements of ISO 27001 may be conducted before entering into the contract.
- 3.4 Kinetic Solutions requires a written agreement to provide the service as specified and requires the supplier to provide appropriate security for the personal information it will process.
- 3.5 All data processing contracts allow Kinetic Solutions to conduct regular audits of the supplier's security arrangements during the period in which the supplier has access to the personal information.
- 3.6 All data processing contracts forbid suppliers from using further subcontractors without Kinetic Solutions's written authorization for the processing of personal information.
- 3.7 Contracts with second-level subcontractors will only be approved if they require the subcontractors to comply with at least the same security and other provisions as the primary subcontracting organization (the supplier) if they specify that, when the contract is terminated, related personal information will either be destroyed or returned to Kinetic Solutions.



Below is a list of the approved Kinetic third party processors and sub-contractors:

<u>SUPPLIER</u>	<u>LOCATION</u>	<u>NATURE OF PROCESSING</u>	<u>DATA TYPE</u>	<u>TRANSFER BASIS</u>
MICROSOFT AZURE	EEA, USA	HOSTING PROVIDER	PERSONAL AND SENSITIVE	DPA as published by Microsoft
CONTOUR SOFTWARE (Pvt.) Ltd	PAKISTAN	DEVELOPMENT AND SUPPORT SERVICES	PERSONAL AND SENSITIVE	DPA based on STANDARD APPROVED EU MODEL CLAUSES
AMAZON WEB SERVICES (AWS)	EEA, USA	CLOUD SERVICES PROVIDER (KXPAYMENTS)	PERSONAL	DPA as published by AWS
GOOGLE CLOUD PLATFORM (GCP)	EEA, USA	CLOUD SERVICES PROVIDER (PULSE)	PERSONAL AND SENSITIVE	DPA as published by GCP
CARDSTREAM	UK	PAYMENT SERVICE PROVIDER (KXPAYMENTS)	PERSONAL	DPA
SMARTHOTELS	EEA	CHANNEL MANAGER	PERSONAL	DPA

