A&O SHEARMAN

Third Party Supplier *Data Protection Requirements*

Confidentiality and security of our data is of the utmost importance to A&O Shearman, its clients and regulators. These requirements apply to all suppliers, including any company, firm or individual, that provide a product or service or undertake any activity for or on behalf of A&O Shearman, either directly or indirectly.
A&O Shearman Personal Data means personal data that is: (i) supplied by or on behalf of A&O Shearman to the supplier (including where the supplier has access to personal data held by the A&O Shearman or on its behalf), (ii) collected, generated or otherwise processed by the supplier for or on behalf of A&O Shearman; or (iii) processed by the supplier in the course of providing the contracted product or services to A&O Shearman.

1. Compliance with data protection obligations

1.1 The supplier must ensure that it has implemented technical, contractual and organisational measures, which are aligned with good industry practice and comply with its data protection obligations in relation to processing A&O Shearman Personal Data. Without limitation, these obligations include those arising from all applicable data protection laws and A&O Shearman's policies, procedures and contracts with the supplier.

1.2 The supplier must be able to demonstrate its compliance with these obligations on A&O's request.

2. Contractual requirements

2.1 The supplier must enter into a written agreement with the A&O Shearman, including mandatory data protection clauses where appropriate. Without limitation, these shall include obligations on the supplier regarding processing restrictions, sub-processors, audit rights, confidentiality and data security, cross border transfers, access restrictions and notifications, record keeping, data breach reporting and handling, complaints, requests and enquiries, data subject rights, communication with data protection authorities, supplier personnel, and data retention and deletion.

2.2 The supplier must execute any additional data transfer agreement with A&O Shearman, where required to ensure compliant cross border transfers of A&O Shearman Personal Data.

3. Assistance

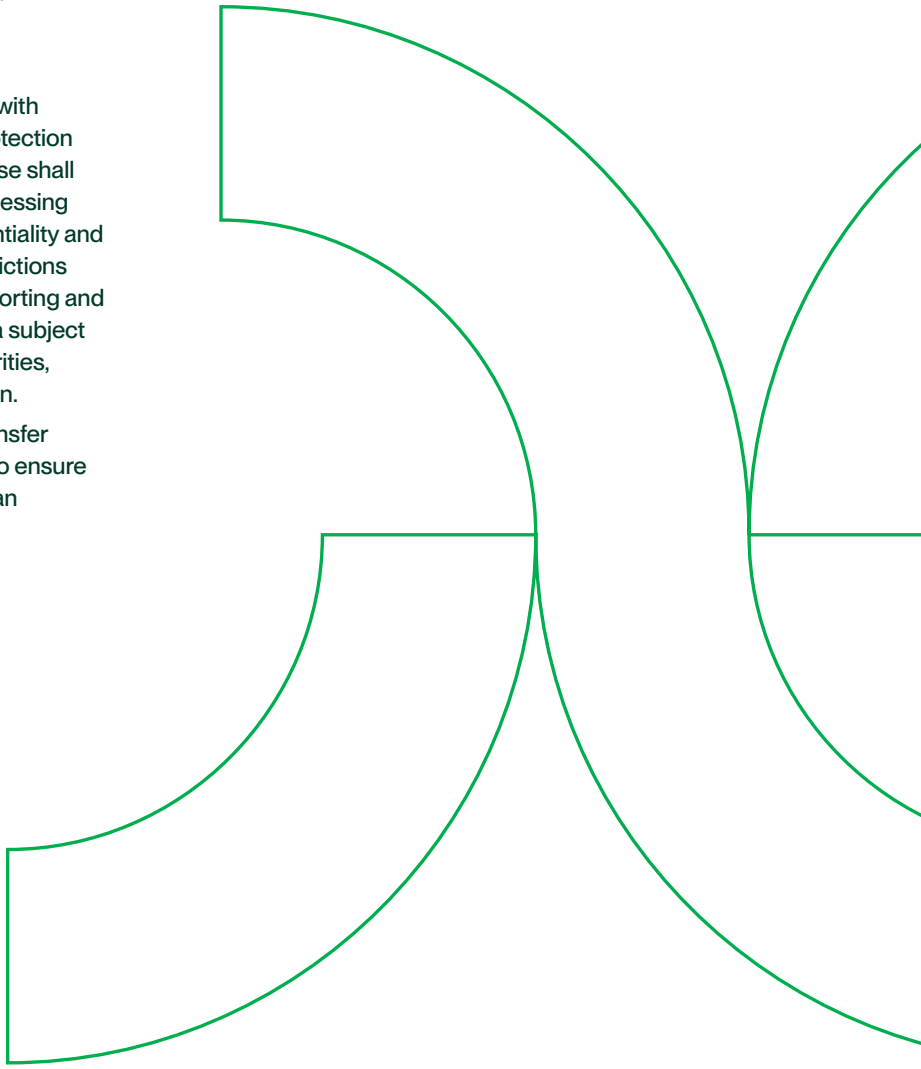
3.1 The supplier must assist A&O Shearman, and provide all relevant information, with any assessment of the impact of processing A&O Shearman Personal Data, including data privacy impact assessments and transfer impact assessments, promptly on A&O Shearman's request.

3.2 The supplier must provide A&O Shearman with all co-operation and assistance requested by A&O Shearman to enable A&O Shearman to comply with its data protection obligations.

3.3 The supplier must designate a contact person who is responsible for ensuring compliance and communication with A&O Shearman in relation to data protection.

4. Data breach reporting

4.1 The supplier must report actual or suspected breaches involving A&O Shearman Personal Data to A&O Shearman promptly and in any event within 24 hours, and co-operate fully with A&O Shearman in their investigation and remediation.



Global presence

A&O Shearman is an international legal practice with approximately 4,000 lawyers, including some 800 partners, working in 29 countries worldwide. A current list of A&O Shearman offices is available at www.aoshearman.com/en/global-coverage.

A&O Shearman means A&O Shearman LLP and/or its affiliated undertakings. A&O Shearman LLP is a limited liability partnership registered in England and Wales with registered number OC306763. A&O Shearman LLP is authorised and regulated by the Solicitors Regulation Authority of England and Wales.

The term partner is used to refer to a member of A&O Shearman LLP or an employee or consultant with equivalent standing and qualifications or an individual with equivalent status in one of A&O Shearman LLP's affiliated undertakings. A list of the members of A&O Shearman LLP and of the non-members who are designated as partners is open to inspection at our registered office at One Bishops Square, London E1 6AD.

© A&O Shearman LLP 2024. This document is for general information purposes only and is not intended to provide legal or other professional advice.

A&O Shearman was formed on 1 May 2024 by the combination of Shearman & Sterling LLP and Allen & Overy LLP and their respective affiliates (the legacy firms). This publication may include content generated by one or more of the legacy firms rather than A&O Shearman.

GB
CS2404_CDD-77236_Data Privacy Requirements