

SECTION 06 OF 10

Processors & Third-Party Tools

UK GDPR · DPA 2018 · DUAA 2025 Compliance Checklist

Where a third party processes personal data on your behalf, Article 28 UK GDPR requires a written contract with specific mandatory terms, and Chapter V governs any transfer outside the UK. The ICO updated its international transfer guidance in early 2026, and DUAA reforms to the research and legitimate interests regime may also affect how you assess certain suppliers.

- ☐ We maintain an up-to-date list of all processors and third-party tools that process personal data on our behalf (booking systems, email platforms, cloud storage, payment providers, AI tools, etc.).
- ☐ We have written Article 28-compliant contracts with our processors that clearly set out roles, responsibilities and instructions.
- ☐ We have assessed our processors' technical and organisational measures and are satisfied they provide appropriate security and compliance.
- ☐ We know where personal data is stored and processed for each supplier (UK, EEA or elsewhere).
- ☐ Where personal data is transferred outside the UK, we have identified and implemented an appropriate transfer mechanism (e.g. UK IDTA, Addendum to the EU SCCs, or an adequacy finding), reviewed against the ICO's updated 2026 international transfer guidance. **DUAA UPDATE**
- ☐ We review key suppliers periodically and update contracts or arrangements when services, sub-processors or risks change.