



Revision History

Version	Date
External Vendor Agreement Policy, 1.0	31 July 2021

EXTERNAL VENDOR AGREEMENT POLICY

It is the policy of USEIC to obtain an External Vendor Agreement (EVA) from a business vendor, service provider or a non-workforce member individual that will have access to Personally Identifiable Information (PII) in compliance with the requirements of the Republic of Singapore Personal Data Protection Act (PDPA, 2012).

Overview

Reason(s) for the Policy

USEIC is required by the PDPA to obtain satisfactory assurances that PII will be appropriately safeguarded by a business vendor, service provider or other non-workforce member that will create, receive, maintain, or transmit PII for or on behalf of USEIC.

USEIC workforce members shall not disclose PII to a business vendor, service provider or any other non-workforce member without a fully executed EVA or other appropriate authorization.

This policy defines when an EVA is required, the procedure to complete an EVA and the responsibilities for USEIC business units when an EVA is obtained.

Primary Guidance to Which This Policy Responds

All USEIC workforce members.

Who is Governed by This Policy

All USEIC workforce members.

Who Should Know This Policy

All USEIC workforce members.

Policy

1. Each business vendor, service provider, or non-workforce member that creates, receives, maintains, or transmits PII for or on behalf of USEIC must enter into an EVA in which the External Vendor is obligated to protect the privacy, security, and confidentiality of such PII in accordance with the PDPA.
2. Each department/program or business unit is responsible for identifying when a business vendor, service provider or non-workforce member will create, receive, maintain, or transmit PII for or on behalf of USEIC.
3. Any department/program or business unit that establishes an External Vendor relationship with a business vendor, service provider, or non-workforce member is responsible for obtaining satisfactory assurances in the form of an EVA that the External Vendor will comply with regulatory requirements to appropriately safeguard PII, including by protecting its confidentiality, integrity, and availability.
4. The EVA template (form) can be requested from the Data Protection Officer (DPO) at dpo@useic.org.

5. If the External Vendor requests to modify the EVA template or does not agree that they are acting in the capacity of an External Vendor, the Executive Manager and DPO shall be consulted.
6. All EVAs shall be submitted to the DPO for review and signature. The fully executed agreement is provided to the Director and a copy will be maintained by the DPO.
7. The DPO is responsible for maintaining a list of all active EVAs.
8. When an External Vendor relationship is terminated, it is the responsibility of the department/program or business unit to assure the return or destruction of PII according to the terms of the EVA and in compliance with PDPA Rules. The department/program or business unit must also inform the DPO when an EVA relationship is terminated.
9. A list of all EVAs is available upon request to the DPO at dpo@useic.org.
10. The Executive Manager and DPO will verify any agreement, contract or other business arrangement includes a fully executed EVA when processing purchase orders or service agreements where an EVA is required pursuant to this Policy.
11. Where an EVA is required, a purchase order will not be processed and access to PII shall not be granted to the External Vendor until an EVA is fully executed.
12. A list of potential External Vendors include, but are not limited to the following:
 - Accreditation organizations;
 - Billing, coding, and collection vendors;
 - Quality assurance organizations;
 - Consultants;
 - Answering services;
 - Shredding, destruction and/or documentation storage companies;
 - Data processing firms;
 - Application service providers;
 - Law firms /attorneys;
 - External auditors or accountants;
 - Professional translator services; and
 - Software vendors.

For further guidance related to a potential External Vendor relationship, contact the DPO at dpo@useic.org

Responsibilities

- The DPO will maintain a list of all signed EVAs.
- Administrators will assure vendors meeting the definition of an External Vendor have an EVA executed before permitting access to PII.
- Administrators will verify vendors have an EVA (where required) before processing a purchase order and periodically verify the status of their EVA relationships.

Definitions

External Vendor – A person or entity that performs certain functions or activities that involve creating, receiving, maintaining, or transmitting personally identifiable information for or on behalf of USEIC.

PDPA Rules – The Personal Data Protection Act (2012) Rules as amended from time to time.

Personally Identifiable Information (PII) is individually identifiable information:

(1) That is: (i) Transmitted by electronic media; (ii) Maintained in electronic media; or (iii) Transmitted or maintained in any other form or medium (includes paper and oral communications).

(2) That is: (i) In education records; (ii) In employment records held by a covered entity in its role as employer; and (iii) Regarding a person who has been deceased for more than 50 years.

Workforce includes faculty, staff, students, and other individuals whose conduct, the performance of work for USEIC is under the direct control of USEIC.