

Joint Data Controller Arrangement

This arrangement is made between the Cabinet Office and the Foreign, Commonwealth & Development Office of the Government of the United Kingdom of Great Britain and Northern Ireland, the United Nations and the secretariat of the United Nations Framework Convention on Climate in the facilitation of COP26, referred to jointly in this arrangement as the participants.

This arrangement will remain valid until superseded by a revised arrangement.

1. Purpose of arrangement

The purpose of this arrangement is to explain the role of each organisation covered by this arrangement and to explain the nature of the personal data collected, processed and shared as part of the facilitation of COP26 and the roles of each of the participants of this arrangement who are joint controllers of the data.

2. Overview

“COP26” means the conference convened by the Conference of the Parties to the United Nations Framework Convention on Climate Change comprising (i) the 26th session of the Conference of the Parties to the United Nations Framework Convention on Climate Change, (ii) the 16th session of the Conference of the Parties serving as the meeting of the Parties to the Kyoto Protocol and (iii) the third session of the Conference of the Parties serving as the meeting of the Parties to the Paris Agreement. The UK holds the Presidency for COP26. To be able to successfully facilitate the conference, the participants of this arrangement have been identified as joint data controllers.

To be able to successfully deliver COP26 the participants of this arrangement are required to collect and share personal data relating to the summit. This information may include personal data or personal sensitive data regarding delegations, attendees and participants and where appropriate participants are required to share this information with each other to facilitate specific needs such as but not limited to access to the venue and access to the United Kingdom.

3. Data Protection

The Cabinet Office and the Foreign, Commonwealth and Development Office (“FCDO”) will comply with all relevant provisions of the UK General Data Protection Regulation (“GDPR”)

and Data Protection Act 2018, and will actively work to ensure that all participants handle personal data appropriately.

The United Nations and the secretariat of the United Nations Framework Convention on Climate Change acknowledge the obligations of the Cabinet Office and of the FCDO under the GDPR and Data Protection Act 2018.

The United Nations and the secretariat of the United Nations Framework Convention on Climate Change will comply with their respective applicable internal policies, rules and procedures on data protection and privacy.

3a. Responsibilities of the Cabinet Office as a Joint Controller

Under this arrangement the Cabinet Office accepts the following specific responsibilities:

- Carry out any necessary data protection impact assessments for the data they collect and hold
- Publish an appropriate privacy policy for the data they collect
- Follow the Cabinet Office Data Security Guidance to ensure that the necessary measures are taken to protect personal data
- Ensure that Cabinet Office staff are appropriately trained in how to use and manage personal data and follow approved processes for data handling
- Ensure that Cabinet Office staff hold appropriate security clearance to access personal data
- Provide arrangements to organisations named under this arrangement to facilitate the lawful sharing of individual level personal data amongst participants where necessary
- Coordinate responses to data subject access requests received by the Cabinet Office and other participants of this arrangement with the FCDO
- Report any data breaches within the Cabinet Office or by other participants of this arrangement to the department's Data Protection Officer, and any reportable breaches to the Information Commissioner's Office (ICO) and affected data subjects as required
- Ensure an appropriate level of technical and organisational security for the personal data, including restricting access to the database to approved staff only
- Maintain any GDPR Article 30 processing records for data held on Cabinet Office systems or on behalf of Cabinet Office

3b. Responsibilities of the FCDO as a Joint Controller

Under this arrangement the FCDO accepts the following specific responsibilities:

- Carry out any necessary data protection impact assessments for the data they collect and hold
- Publish an appropriate privacy policy for the data they collect
- Follow the FCDO data security guidance to ensure that the necessary measures are taken to protect personal data
- Ensure that FCDO staff are appropriately trained in how to use and manage personal data and follow approved processes for data handling
- Ensure that FCDO staff hold appropriate security clearance to access personal data
- Coordinate responses to data subject access requests received by the FCDO and other participants of this arrangement with the Cabinet Office
- Report any data breaches within the FCDO to the department's Data Protection Officer and the Cabinet Office, and any reportable breaches to the ICO and affected data subjects as required
- Ensure an appropriate level of technical and organisational security for the personal data, including restricting access to the database to approved staff only
- Maintain any GDPR Article 30 processing records for data held on FCDO systems

3c. Responsibilities of the United Nations (UN) as a Joint Controller

Under this arrangement the United Nations accepts the following specific responsibilities:

- To handle data in accordance with its internal policies, rules and procedures, including the UN [Principles on Personal Data Protection and Privacy](#)
- To carry out any necessary data protection impact assessments for the data they collect and hold
- Ensure that relevant UN staff are appropriately aware of how to use and manage personal data and follow appropriate processes for data handling
- Notify Cabinet Office about any data subject rights requests they receive relating to COP26, and provide reasonable assistance to Cabinet Office in responding to such requests

- Report any data breaches by the UN to the Cabinet Office upon discovery and where appropriate inform the data subjects
- Ensure an appropriate level of technical and organisational security for the personal data, including restricting access to the database to approved staff only

3d. Responsibilities of the secretariat of the United Nations Framework Convention on Climate Change as a joint controller

Under this arrangement the secretariat of the United Nations Framework Convention on Climate Change (“UNFCCC Secretariat”) accepts the following specific responsibilities:

- To handle data in accordance with its internal policies, rules and procedures
- To carry out any necessary data protection impact assessments for the data they collect and hold
- Ensure that relevant UNFCCC Secretariat staff are appropriately aware of how to use and manage personal data and follow appropriate processes for data handling
- Notify Cabinet Office about any data subject access requests they receive relating to COP26, and provide reasonable assistance to Cabinet Office in responding to such requests
- Report any data breaches by the UNFCCC Secretariat to the Cabinet Office upon discovery and where appropriate inform the data subjects
- Ensure an appropriate level of technical and organisational security for the personal data, including restricting access to the database to approved staff only

4. Data Retention

The Cabinet Office and the FCDO will not keep personal data for longer than needed as per GDPR but notes the requirements the Cabinet Office and FCDO have that where data is considered to be a public record it must be preserved under the Public Records Act 1958.

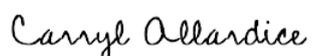
The United Nations and the secretariat of the United Nations Framework Convention on Climate Change will comply with their respective applicable internal policies, rules and procedures on data retention, including administrative issuances on record-keeping and the management of United Nations archives.

5. Publishing this document

The Cabinet Office will take responsibility for publishing this document.

6. Arrangement between Participants

This Arrangement is without prejudice to the privileges and immunities of the United Nations. The below organisations referred to in this document as the 'participants' accept the above roles and responsibilities as joint controllers of data relating to COP26.

| Name | Organisation | Signature | Date |
|------------------|--------------------|--|-----------------|
| Denise Bissell | Cabinet Office |  | 22 Sept 2021 |
| Carryl Allardice | FCDO |  | 22 Sept 2021 |
| Gilles Michaud | UNDSS |  | 6 Oct 2021 |
| Ovais Sarmad | UNFCCC Secretariat |  | 11 October 2021 |