

EEA Client to Clyde & Co Onward Transfer Arrangement	
Application of this arrangement	This Client to Clyde & Co Onward Transfer Arrangement applies automatically to each Client to Clyde & Co Onward Transfer.
Client to Clyde & Co Onward Transfer	<p>A <i>Client to Clyde & Co Onward Transfer</i> is a transfer of personal data:</p> <ul style="list-style-type: none"> by, or on behalf of, one of our clients (<i>Onward Transfer Client</i>) that is a party, in the role of <i>data importer</i>, to the EU's standard contractual clauses for the transfer of personal data from the European Community to third countries (controller to controller transfers) set out in Commission Decision 2004/915/EC in respect of that personal data (<i>Originating EU Controller to Controller Model Clauses</i>); to a Clyde & Co Entity, <p>which, but for the application of this Client to Clyde & Co Onward Transfer Arrangement to the transfer, would constitute a breach by the Onward Transfer Client of the Originating EU Controller to Controller Model Clauses.</p>
Clyde & Co Entities	Clyde & Co LLP together with any entity (including any partnership, company, limited liability partnership or other body corporate or unincorporate) established or practising in any jurisdiction and authorised by Clyde & Co LLP to include in its name 'Clyde & Co' or 'Beaumont & Son' or to describe itself as 'in association with' Clyde & Co LLP.
Additional clauses that apply in respect of the Client to Clyde & Co Onward Transfer	<p>The EU's standard contractual clauses for the transfer of personal data from the European Community to third countries (controller to controller transfers) set out in Commission Decision 2004/915/EC (EU Controller to Controller Model Clauses) shall apply, a copy of which can be found at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32004D0915.</p> <p>This Client to Clyde & Co Onward Transfer Arrangement supplements any other arrangements the Onward Transfer Client and the Clyde & Co Entity have in place in relation to the processing of personal data – such as the data protection provisions set out in the Clyde & Co Entity's Terms of Business.</p> <p>To the extent that there is any conflict or inconsistency between the terms of the EU Controller to Controller Model Clauses and any other arrangement that the Onward Transfer Client and the Clyde & Co Entity have in place in relation to the processing of personal data, the terms of the EU Controller to Controller Model Clauses shall take precedence.</p>
Completing the details needed for the EU Controller to Controller Model Clauses for the Client to Clyde & Co Onward Transfer	<p>For the purposes of the EU Controller to Controller Model Clauses:</p> <ul style="list-style-type: none"> the Onward Transfer Client will be the <i>data exporter</i> and the Clyde & Co Entity will be the <i>data importer</i>; in relation to Clause II(h) of the EU Controller to Controller Model Clauses, the Onward Transfer Client and the Clyde & Co Entity elect to comply with the provisions of sub-Clause II(h)(iii); all references to the <i>data exporter</i> in the definition of <i>the authority</i>, in Clauses I(a), I(c), IV, V(c), VI(b)(iv) and in paragraphs (5) and (8) of Annex A shall be deemed to be references to the data exporter under the Originating EU Controller to Controller Model Clauses; the reference in Clause III(b) to the data exporter's country of establishment shall be deemed to be the country of establishment of the data exporter under the Originating EU Controller to Controller Model Clauses; in relation to Clause II(i) of the EU Controller to Controller Model Clauses, the Onward Transfer Client acknowledges that the Clyde & Co Entity has given appropriate notice to the Onward Transfer Client about onward transfers of the personal data to the recipients described in this table that are data controllers located outside of the European Economic Area; and

	<ul style="list-style-type: none"> the description of the Client to Clyde & Co Onward Transfer for the purposes of Annex B of the EU Controller to Controller Model Clauses is as set out in the rest of this table.
<p>Data subjects</p> <p>The personal data transferred concern the following categories of data subjects</p>	<p>The personal data transferred under the Client to Clyde & Co Onward Transfer will concern one or more of the following categories of data subjects:</p> <ul style="list-style-type: none"> individuals that work for, own or represent the Onward Transfer Client; individuals that work for, own or represent the Onward Transfer Client's service providers; individuals that are either directly or indirectly involved or connected with, or relevant to, a matter on which Clyde & Co is advising the Onward Transfer Client (either directly or indirectly); and individuals whose details are transferred to Clyde & Co in connection with its role as the legal representative of the Onward Transfer Client.
<p>Purposes of the transfer(s)</p> <p>The transfer is made for the following purposes</p>	<p>The Client to Clyde & Co Onward Transfer is made for one or more of the following main purposes:</p> <ul style="list-style-type: none"> to provide the Onward Transfer Client with legal advice and related services; to carry out relevant credit checks; to manage and develop Clyde & Co's business with the Onward Transfer Client, which may include using the personal data for marketing purposes where relevant; and to comply with the Clyde & Co Entity's, and the wider Clyde & Co group's, legal and regulatory requirements. <p>Full details of the purposes for which the Clyde & Co Entity may use the personal data are set out in the Clyde & Co privacy notice, a copy of which can be found at www.clydeco.com/help/privacy.</p>
<p>Categories of data</p> <p>The personal data transferred concern the following categories of data</p>	<p>The Client to Clyde & Co Onward Transfer will include the transfer of one or more of the following categories of personal data:</p> <ul style="list-style-type: none"> individual details – name, address (including proof of address), other contact details (e.g. email and telephone numbers), gender, marital status, date and place of birth, nationality, employer, job title and employment history, and family details, including their relationship to the data subject; identification details – identification numbers relating to the data subject issued by government bodies or agencies, such as national insurance numbers, social security numbers, passport numbers, tax identification numbers and driving licence numbers; financial information – bank account or payment card details, income or other financial information about the data subject; matter details – information about the data subject which is relevant to a matter on which Clyde & Co is advising the Onward Transfer Client; credit, anti-fraud and sanctions data – credit history, credit score and information received from various anti-fraud and sanctions databases relating to the data subject; and identifiers – information which can be traced back to the data subject, such as an IP address, a website tracking code or electronic images of the data subject.
<p>Recipients</p> <p>The personal data transferred may be disclosed only to the following recipients or categories of</p>	<p>The personal data may be disclosed by the Clyde & Co Entity to a number of third parties in connection with the purposes of the Client to Clyde & Co Onward Transfer – including to the Clyde & Co Entity's service providers and to other Clyde & Co Entities.</p> <p>Full details of the recipients to which the personal data may be disclosed are set out in the Clyde & Co privacy notice, a copy of which can be found at</p>

recipients	www.clydeco.com/help/privacy .	
Sensitive data (if appropriate) The personal data transferred concern the following categories of sensitive data	Where relevant, the Client to Clyde & Co Onward Transfer may include the transfer of the following categories of sensitive data: <u>Special categories of personal data</u> : information about health, racial or ethnic origin; political opinions, religious or philosophical beliefs; trade union membership; genetic and biometric data; and information about a person's sex life or sexual orientation, in each case where relevant to the purposes of the transfer. <u>Criminal convictions data</u> : information relating to criminal convictions and offences.	
Data protection registration information of data exporter (where applicable)	Not applicable.	
Additional useful information (storage limits and other relevant information)	None.	
Contact points for data protection enquiries	<p>DATA IMPORTER</p> <p>Clyde & Co has a data protection officer whose job is to oversee the Clyde & Co Entities' data protection compliance. The data protection officer can be contacted by sending:</p> <ul style="list-style-type: none"> • an email to: dataprotectionofficer@clydeco.com • a letter to: The Data Protection Officer, Clyde & Co LLP, The St Botolph Building, 138 Houndsditch, London EC3A 7AR, United Kingdom 	<p>DATA EXPORTER</p> <p>The Onward Transfer Client's data protection compliance function.</p> <p>Please contact the data importer for the contact details of the Onward Transfer Client's data protection compliance function.</p>