

EEA Clyde & Co to Client Onward Transfer Arrangement	
<b>Application of this arrangement</b>	This Clyde & Co to Client Onward Transfer Arrangement applies automatically to each Clyde & Co to Client Onward Transfer.
<b>Clyde &amp; Co to Client Onward Transfer</b>	<p>A <i>Clyde &amp; Co to Client Onward Transfer</i> is a transfer of personal data:</p> <ul style="list-style-type: none"> <li>by, or on behalf of, a Clyde &amp; Co Entity (<i>Onward Transfer Clyde &amp; Co Entity</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 Union to third countries (controller to controller transfers) set out in Commission Decision 2019/914/EU in respect of that personal data (<i>Originating EU Controller to Controller Model Clauses</i>);</li> <li>to one of Clyde &amp; Co's clients (<i>Client</i>),</li> </ul> <p>which, but for the application of this Clyde &amp; Co to Client Onward Transfer Arrangement to the transfer, would constitute a breach by the Onward Transfer Clyde &amp; Co Entity of the Originating EU Controller to Controller Model Clauses.</p>
<b>Clyde &amp; Co Entities</b>	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.
<b>Additional clauses that apply in respect of the Clyde &amp; Co to Client Onward Transfer</b>	<p>The standard contractual clauses for the transfer of personal data to third countries, Module One: Transfer controller to controller, set out in Commission Decision 2021/914/EU (<b>2021 Controller to Controller Model Clauses</b>) shall apply and a copy of which can be found at: <a href="https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32021D0914&amp;from=EN">https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32021D0914&amp;from=EN</a></p> <p>This Clyde &amp; Co to Client Onward Transfer Arrangement supplements any other arrangements the Onward Transfer Clyde &amp; Co Entity and the Client have in place in relation to the processing of personal data – such as the data protection provisions set out in the Onward Transfer Clyde &amp; 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 Client and the Onward Transfer Clyde &amp; 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>
<b>Completing the details needed for the 2021 Controller to Controller Model Clauses:</b>	<p>For the purposes of the 2021 Controller to Controller Model Clauses:</p> <ol style="list-style-type: none"> <li>the Onward Transfer Clyde &amp; Co Entity will be the <i>data exporter</i> and the Client will be the <i>data importer</i>;</li> <li>Clause 7 (Docking clause) of the 2021 Controller to Controller Model Clauses shall not apply;</li> <li>under Clause 8.8 (Onward Transfers), the <i>data exporter</i> agrees that the <i>data importer</i> may disclose personal data to the third parties described in Annex I B;</li> <li>the optional wording set out in Clause 11(a) (Redress) of the 2021 Controller to Controller Model Clauses shall not apply;</li> </ol>

	<p>5. Clause 17 (Governing law), Module One: Transfer Controller to Controller, OPTION 1 of the 2021 Controller to Controller Model Clauses shall apply with the specified law for that Clause being Ireland;</p> <p>6. under Clause 18 (Choice of forum and jurisdiction), Module One: Transfer Controller to Controller, (b), the specified courts shall be the courts Ireland;</p> <p>7. the list of parties, description of transfer and identification of the competent supervisory authority for the purposes of Annex I contained within the Appendix to the 2021 Controller to Controller Model Clauses are as set out in Table 2; and</p> <p>8. the description of the technical and organisational security measures implemented by the <i>data importer</i> for the purposes of Annex II contained within the Appendix to the 2021 Controller to Controller Model Clauses are as set out in Table 3.</p>	
<p><b>Contact points for data protection enquiries</b></p>	<p><b>DATA IMPORTER</b></p> <p>The Client's data protection compliance function.</p> <p>Please contact the data importer for the contact details of the Client's data protection compliance function.</p>	<p><b>DATA EXPORTER</b></p> <p>Clyde &amp; Co has a data protection officer whose job is to oversee the Clyde &amp; Co Entities' data protection compliance. The data protection officer can be contacted by sending:</p> <ul style="list-style-type: none"> <li>• an email to: <a href="mailto:dataprotectionofficer@clydeco.com">dataprotectionofficer@clydeco.com</a></li> <li>• a letter to: The Data Protection Officer, Clyde &amp; Co LLP, The St Botolph Building, 138 Houndsditch, London EC3A 7AR, United Kingdom.</li> </ul>

<p><b>Table 2: Annex I contained within the Appendix to the 2021 Controller to Controller Model Clauses</b></p>	
<p><b>Annex I A: List of parties</b></p>	
<p><b>Data exporter</b></p>	<p><i>Name:</i> As stated in our terms of engagement  <i>Address:</i> As stated in our terms of engagement  <i>Data protection contact name, position and contact details:</i> As stated in the table above  <i>Activities relevant to the data transferred under the 2021 Controller to Controller Model Clauses:</i> As stated in Annex I B of this table  <i>Role:</i> Controller</p>
<p><b>Data importer</b></p>	<p><i>Name:</i> As stated in our terms of engagement  <i>Address:</i> As stated in our terms of engagement  <i>Data protection contact name, position and contact details:</i> As stated in the table above  <i>Activities relevant to the data transferred under the 2021 Controller to Controller Model Clauses:</i> As stated in Annex I B of this table  <i>Role:</i> Controller</p>

<b>Annex I B: Description of transfer</b>	
<p><b>Categories of data subjects whose personal data is transferred</b></p>	<p>The personal data transferred under the Clyde &amp; Co to Client Onward Transfer Arrangement will concern one or more of the following categories of data subjects:</p> <ul style="list-style-type: none"> <li>• individuals that work for, own or represent the Client;</li> <li>• individuals that work for, own or represent the Client’s service providers;</li> <li>• individuals that work for, own or represent Clyde &amp; Co or any of its service providers;</li> <li>• individuals that are either directly or indirectly involved or connected with, or relevant to, a matter on which Clyde &amp; Co is advising the Client (either directly or indirectly); and</li> <li>• individuals whose details are transferred to Clyde &amp; Co in connection with its role as the legal representative of the Client.</li> </ul>
<p><b>Categories of personal data transferred</b></p>	<p>The Clyde &amp; Co to Client Onward Transfer Arrangement will include the transfer of one or more of the following categories of personal data:</p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• 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;</li> <li>• financial information – bank account or payment card details, income or other financial information about the data subject;</li> <li>• matter details – information about the data subject which is relevant to a matter on which Clyde &amp; Co is advising the Client;</li> <li>• 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</li> <li>• 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.</li> </ul>
<p><b>Sensitive data transferred (if applicable) and applied restrictions or safeguards that fully take into consideration the nature of the data and the risks involved, such as for instance strict purpose limitation, access restrictions (including access only for staff having followed specialised training),</b></p>	<p>Where relevant, the Clyde &amp; Co to Client Onward Transfer may include the transfer of the following categories of sensitive data:</p> <p><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.</p> <p><u>Criminal convictions data:</u> information relating to criminal convictions and offences.</p> <p>Please contact the <i>data importer</i> for further details about restrictions and safeguards in place for the sensitive data transferred.</p>

<b>keeping a record of access to the data, restrictions for onward transfers or additional security measures</b>	
<b>The frequency of the transfer (e.g. whether the data is transferred on a one-off or continuous basis)</b>	The personal data is transferred to the <i>data importer</i> as required in order for legal services to be provided to the <i>data importer</i> .
<b>Nature of the processing</b>	Personal data will be processed in any way required in order to fulfil the purposes for which it was transferred, but only to the extent necessary for the purposes of the data transfer (as set out below).
<b>Purpose(s) of the data transfer and further processing</b>	<p>The Clyde &amp; Co to Client Onward Transfer is made for one or more of the following main purposes:</p> <ul style="list-style-type: none"> <li>• to provide the Client with legal advice and related services;</li> <li>• to carry out relevant credit checks;</li> <li>• to manage and develop Clyde &amp; Co's business with the Client, which may include using the personal data for marketing purposes where relevant; and</li> <li>• to comply with the Onward Transfer Clyde &amp; Co Entity's, and the wider Clyde &amp; Co group's, legal and regulatory requirements.</li> </ul> <p>Full details of the purposes for which the Onward Transfer Clyde &amp; Co Entity may use the personal data are set out in the Clyde &amp; Co privacy notice, a copy of which can be found at <a href="http://www.clydeco.com/help/privacy">www.clydeco.com/help/privacy</a>.</p>
<b>The period for which the personal data will be retained, or, if that is not possible, the criteria used to determine that period</b>	The personal data will be retained by the <i>data importer</i> only for as long as is necessary and in accordance with its data retention policy.
<b>For transfers to (sub-) processors, also specify subject matter, nature and duration of the processing</b>	The personal data may be disclosed to other members of the Client's group or to the Client's professional advisers solely in connection with the purposes of the Clyde & Co to Client Onward Transfer.
<b>Annex I C: Competent Supervisory Authority</b>	
<b>Identify the competent supervisory authority/ies</b>	The supervisory authority with responsibility for ensuring compliance by the <i>data exporter</i> with Regulation (EU) 2016/679 as regards the data transfer is the supervisory authority in the country where the Onward Transfer Clyde & Co Entity is located.

**Table 3: Annex II contained within the Appendix to the 2021 Controller to Controller Model Clauses**

**Annex II: Technical and organisational measures including technical and organisational measures to ensure the security of the data**

**Description of the technical and organisational measures implemented by the data importer(s) (including any relevant certifications) to ensure an appropriate level of security, taking into account the nature, scope, context and purpose of the processing, and the risks for the rights and freedoms of natural persons**

Please contact the *data importer* for further details.