

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 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>);</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 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 (<b>EU Controller to Controller Model Clauses</b>) shall apply, a copy of which can be found at: <a href="https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32004D0915">https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32004D0915</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 EU Controller to Controller Model Clauses for the Clyde &amp; Co to Client Onward Transfer</b>	<p>For the purposes of the EU Controller to Controller Model Clauses:</p> <ul 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>in relation to Clause II(h) of the EU Controller to Controller Model Clauses, the Onward Transfer Clyde &amp; Co Entity and the Client elect to comply with the provisions of sub-Clause II(h)(iii);</li> <li>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;</li> <li>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; and</li> <li>the description of the Clyde &amp; Co to Client 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.</li> </ul>

<p><b>Data subjects</b></p> <p>The personal data transferred concern the following categories of data subjects</p>	<p>The personal data transferred under the Clyde &amp; Co to Client Onward Transfer 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>Purposes of the transfer(s)</b></p> <p>The transfer is made for the following purposes</p>	<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>
<p><b>Categories of data</b></p> <p>The personal data transferred concern the following categories of data</p>	<p>The Clyde &amp; Co to Client Onward Transfer 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>Recipients</b></p> <p>The personal data transferred may be disclosed only to the following recipients or categories of recipients</p>	<p>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 &amp; Co to Client Onward Transfer.</p>

<p><b>Sensitive data</b> (if appropriate)</p> <p>The personal data transferred concern the following categories of sensitive data</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><b>Data protection registration information of data exporter</b> (where applicable)</p>	<p>Not applicable.</p>	
<p><b>Additional useful information</b> (storage limits and other relevant information)</p>	<p>None.</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 exporter 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>

Version 1.1, last updated 22.12.2020