

Questions and Answers for BT Suppliers:

CJEU Decision and Impact on the EU-US Privacy Shield Framework

Q: What is the EU-US Privacy Shield Framework?

A: The EU-US Privacy Shield Framework was developed and agreed to by the European Commission and the US Department of Commerce in 2016. It enabled US organizations certified under the programs to legitimately receive personal data from the EU. More information about the programs may be found at the U.S. Department of Commerce's website at:

<https://www.privacyshield.gov/welcome>.

Q: What has happened to the EU-US Privacy Shield Framework?

A: On 16 July 2020, the European Union Court of Justice (CJEU) declared the EU-US Privacy Shield program invalid. As a result, organisations can no longer rely upon their Privacy Shield certification as a method for transferring personal data from the EEA to the US.

Q: What does this mean for suppliers who rely on the Privacy Shield?

A: BT Suppliers will need to enter into the Standard Contractual Clauses (sometimes referred to as model clauses) with BT.

Q: What does this mean for suppliers who use sub-processors who rely on the Privacy Shield?

A: BT Suppliers will need to put in place Standard Contractual Clauses with their sub-processors.

Q: What are the Standard Contractual Clauses?

A: The Standard Contractual Clauses are a set of contract terms created by the European Commission to legitimise the transfer of personal data from the EEA to jurisdictions outside of the EEA which have not been granted adequacy status by the European Commission.

Q: How does my company incorporate Standard Contractual Clauses into my BT contract?

A: If necessary, you can incorporate Standard Contractual Clauses by the clicking on the link provided in the assessment questionnaire. This will open an Adobe Sign webform that you can complete and submit electronically. The Standard Contractual Clauses, by its terms, will be incorporated into your existing agreement with BT.

Q: What should I do if I have additional questions?

A: Please contact data.transfers@bt.com and we will be happy to assist you.