

Transfer of data to third countries or International Organisations Procedures



May 2018

Review Date: May 2021

Transfer of data to third countries or international organisations procedures

Scope

in at the deep end Ltd as a company includes the Training Wave brand. Therefore, throughout all of our policies where we refer to in at the deep end it also applies to any bookings or courses undertaken within the Training Wave brand.

This procedure applies where, in accordance with the GDPR, in at the deep end wishes to transfer personal data to third countries or international organisations outside of the EU for processing. This includes the onward transfer of personal data from a third country, or an international organisation to another third country, as well as to another international organisation within the scope of this procedure.

Responsibilities

It is the responsibility of in at the deep end to ensure that the appropriate level of protection of personal data of natural persons guaranteed by the GDPR to EU residents is not undermined.

Transfers of personal data to third countries or international organisations procedure

When transferring personal data to third countries or international organisations outside of the EU, in at the deep end checks that there is an adequate level of protection established by one of the following:

- the country, or industry sector within that country, of the recipient is on the EU approved list of countries as set out in the Official Journal of the European Union;
- the country of the recipient has adequate data protection controls established by legal or self-regulatory regime;
- in at the deep end has a contract in place that uses existing or approved data protection clauses to ensure adequate protection;
- in at the deep end is making the transfer under approved binding corporate rules;
- in at the deep end is relying on approved codes of conduct or certification mechanisms, together with binding and enforceable commitments in the third country or international organisation to apply the appropriate safeguards in relation to data subject rights.
- Provisions inserted into administrative arrangements between public authorities or bodies authorised by the competent supervisory authority.
- Where there is no adequacy decision or appropriate safeguards in place, in at the deep end can rely on an exemption within the Data Protection Policy on data transfers; in the absence of all of the above, if the processing is necessary for the purposes of the compelling legitimate interests of the organisation (provided such interests are not overridden by the interests of the individual, a one-off transfer is

possible under restricted conditions if the data controller informs the relevant supervisory authority of the transfer and provides additional information to individuals.

Monitoring and Review

We will monitor all of the feedback that we receive in relation to the issues affected by the Policy and will amend the policy as necessary.

The Policy will be updated with any amendments to existing legislation or new legislation.

In any event, all policies are reviewed annually although updates to versions etc. will only take place every three years should there be no other changes to the policy.

Document Owner and Approval

The Data Protection Officer (DPO) is the owner of this document and is responsible for ensuring that this policy document is reviewed in line with the review requirements stated above.

A current version of this document is available to all members of staff on BaseCamp.

This policy was approved by the Company Directors on 2nd March 2018 and is issued on a version controlled basis under the signature of Managing Director.

Date	Version	Author/Contributor	Amendment Details
December 2017	1.00	Mark Mc Nichol	Implementation
May 2018	1.10	Mark Mc Nichol	Addition of Training Wave branding

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