

A close-up photograph of several white computer keyboard keys. The keys are slightly out of focus, with some showing characters like 'V', 'P', and 'H'. The Accenture logo, consisting of a stylized '>' symbol above the word 'accenture' in lowercase, is overlaid in white on the lower-left portion of the keyboard.

accenture

High performance. Delivered.

Global data transfers, BCR and accountability

Bojana Bellamy
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Mechanisms for Global Data Transfers



Adequacy

Derogations

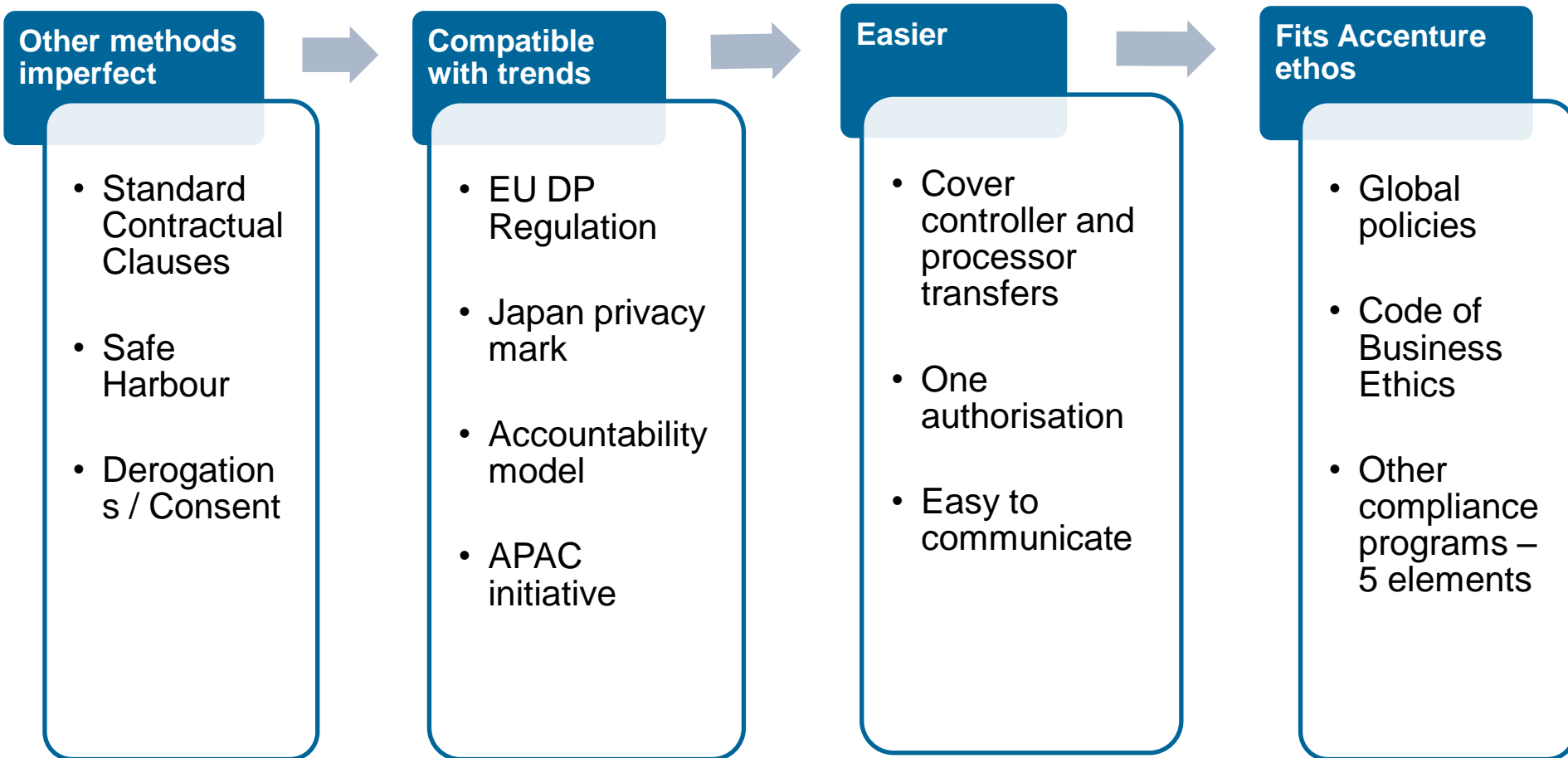
US Safe
Harbour

EU Model
Clauses
Controller to
Controller

EU Model
Clauses
Controller to
Processor

Binding
Corporate
Rules (BCR)

Why BCR Make Sense for Accenture



Accenture Data Privacy Approach



Corporate data privacy and protection programs, applicable to and mandatory for all employees and all Accenture companies worldwide

Accenture Data – Binding Corporate Rules

Client Data – Client Data Protection Program

- Programs establish a uniform high level of data protection for all personal data, regardless of origin and location, but leave space for customization based on local law, or client requirements



5 Elements of Compliance Program



BCR Fits 5 Elements



5 Elements

- Leadership
- Risk Assessment
- Rules and Controls
- Training and Communication
- Audit, Monitor, Respond

Accenture
Global Data Privacy
Program

BCR

- Binding Policies and Procedures
- Data Privacy Oversight / Function
- Training
- Transparency
- Audit
- Binding on employees – possible disciplinary action
- Complaints procedures
- Cooperation with DPAs

The Benefits of BCR



Freedom to operate globally and efficiently

Local legal compliance

Perceived as a regulatory seal of approval

Positive client perception

Trust among our people

Thought and industry leader

