**BREXIT**

**DATA PROTECTION AND TRANSFERS, IF “NO DEAL”**

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**TRANSFER MECHANISM NEEDED**

(Existing arrangements work for now)

U.K. to transitionally recognize EU standard contracts, BCRs, & EU-U.S. Privacy Shield

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**ALSO:**

- Comply with “U.K.” GDPR & the U.K. Data Protection Act 2018
- Select and prove a new lead authority if also established in the EU

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**NO TRANSFER MECHANISM NEEDED**

(You're good)

U.K. to make transitional EU adequacy determination

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**TRANSFER MECHANISM NEEDED**

(Take action)

Options include EU standard contracts or BCRs

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**TRANSFER MECHANISM NEEDED**

(Existing arrangements work for now)

U.K. to transitionally recognize EU standard contracts, BCRs, & adequacy determinations

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**IN GENERAL**

Designate an EU representative and a U.K. representative if subject to the U.K. & EU GDPR from abroad.

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**STAY TUNED**

If a deal on a transition agreement is reached, the U.K. could be under EU law until the end of 2020 (or longer), meaning new transfer mechanisms will not be needed immediately.

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**ALSO:**

- Amend your privacy policy to add "and the United Kingdom" to Privacy Shield commitment
- Ensure your Privacy Shield dispute resolution provider is in the EU or U.S. (not in the U.K.)

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**TO LEARN MORE, VISIT:**

iapp.org/resources/topics/brexit-2/