



## UK BCR PROCESSOR SUMMARY

The Verizon Business Group ("**Verizon**") has approved binding corporate rules for Processors ("**EU BCR-P**"), which are an internationally recognized standard providing adequate protection of personal data in multinational companies. The EU BCR-P were reviewed and approved by data protection authorities across Europe. A copy of Verizon's EU BCR-P is available at <https://www.verizon.com/about/privacy/binding-corporate-rules>

Verizon has entered into the UK BCR Addendum to the approved EU BCR-P. The UK BCR Addendum is a formal legal mechanism which extends the scope of the EU BCR-P to include transfers of personal data from the UK. Together, the EU BCR-P, the UK BCR-P Addendum and this UK BCR-P Summary form Verizon's UK BCR ("**UK BCR-P**"). Further information about the UK BCR addendum process is available on the UK Information Commissioner's Office ("**ICO**") website at <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/international-transfers/guide-to-binding-corporate-rules/a-uk-bcr-addendum/>

The purpose of this UK BCR summary is to provide information to: (i) individuals whose personal data is transferred under the UK BCR-P so that they know how their information is processed, what rights they have under the UK BCR-P and how to enforce them, and (ii) Third Party Exporters.

<b>Contact details for queries about Verizon's UK BCR including from Third Party Exporters</b>	Any questions regarding Verizon's UK BCR-P, your rights under the UK BCR-P or any other data protection issues can be directed to Verizon's Senior Director, International Privacy using the following details: <ul style="list-style-type: none"><li>• Email: <a href="mailto:EMEAdataprotection@verizon.com">EMEAdataprotection@verizon.com</a></li><li>• Telephone: + 44 (0)118 905 5000</li><li>• Address: Verizon Legal Department, Reading International Business Park, Basingstoke Road, Reading RG2 6DA</li></ul>
<b>Description of data transfers covered by Verizon's UK BCR</b>	A description of the data transfers covered by Verizon's UK BCR-P with respect to personal data that is subject to UK data protection law (" <b>UK Personal Data</b> ") is parallel to the transfers described in the "Introduction to this Policy" and "Part I: Background and actions" of the EU BCR-P.  In summary: <ul style="list-style-type: none"><li>• The UK BCR-P is legally binding and apply to all Verizon processor group members that have entered into an intra-group agreement regarding UK Controller Binding Corporate Rules, when processing that information on behalf of a controller third party established in the UK ("<b>Group Members</b>"). A list of the companies bound by the UK BCR-P, including contact details is available <a href="#">here</a>.</li><li>• The UK BCR-P applies to all customer personal information processed by Group Members as processors and/or sub-processors as part of their regular business activities in the course of providing services to a customer established in the UK or otherwise subject to the GDPR.</li><li>• Personal information processed under the UK BCR-P includes customer personal information, including data stored and transmitted across the Verizon network in performing</li></ul>

	<p>communication services under contracts with customers such as audio and images in connection with recorded calls including video calls, call detail records (CDRs), IP addresses, IP network information and geolocation traffic.</p> <ul style="list-style-type: none"> <li>• Transfers of customer personal information under the BCR-P may take place for the purposes of provisioning of services to customers, including call details records in provisioning of services, IP traffic residing in data centres for the purpose of hosting and cloud services, or IP traffic processed in data centres outside the UK for the purposes of providing Managed Security Services.</li> <li>• The UK BCR-P cover both automated and manual types of processing.</li> </ul>	
<p><b>List of countries where personal data is transferred to under the UK BCR</b></p>	<p>The countries where personal data is transferred to under Verizon's UK BCR-P are listed in the <a href="#">"Binding Corporate Rules Participant List"</a>. The countries are as follows:</p>	
	<p>Australia Austria Belgium Bermuda Brazil Bulgaria Canada Chile Czech Republic Denmark Finland France Germany Greece Hong Kong Hungary India Ireland Italy Japan Korea</p>	<p>Lithuania Luxembourg Malaysia Mexico Netherlands New Zealand Norway Peru The Philippines Poland Portugal Romania Singapore Slovakia Spain Sweden Switzerland Taiwan Thailand United Kingdom United States of America</p>
<p><b>The rights of individuals whose personal data is transferred under the UK BCR,</b></p>	<p>The rights of individuals whose personal data is transferred under Verizon's BCR (including the UK BCR) and how to exercise those rights are as described in the following sections of the EU BCR-P:</p>	

<p><b>including third party beneficiary rights, and the means to exercise those rights</b></p>	<ul style="list-style-type: none"> <li>• Rule 4 : Honouring Individuals’ Rights and Appendix 1: Individuals’ Rights Procedure</li> <li>• Section C: Third Party Beneficiary Rights</li> </ul>
<p><b>Responsibility towards the controller</b></p>	<p>As set out in Part I: Background and actions, Section "How does data protection law affect Verizon internationally?" of the EU BCR-P, when Verizon acts as a processor, Verizon's UK customers retain the responsibility to comply with UK data protection law. In practical terms, this means that those acting as controllers (i.e. customers) must pass certain data protection obligations onto any processor which processes customer personal information outside the UK on behalf of those controllers in order to overcome the legal restrictions on international data transfers.</p> <p>If Verizon fails to comply with the data protection obligations imposed on it by its customers, Verizon's customers may be in breach of UK data protection law and Verizon may face a claim for breach of contract which may result in the payment of compensation or other judicial remedies.</p> <p>In such cases, if a customer demonstrates that it has suffered damage, and that it is likely that the damage occurred because of a breach of this UK BCR-P, the obligation will be for Verizon UK Limited to show that the Group Member outside the UK (or a third party sub-processor established outside the UK) is not responsible for the breach, or that no such breach took place.</p> <p>In addition, a customer that has entered into a data processing agreement with Verizon that incorporates this UK BCR-P may enforce this Policy in the courts of England and Wales, where permitted by law and subject to the terms of the data processing agreement, against (i) any Group Member processing customer personal information on behalf of that customer in respect of a breach of the BCR-P caused by that Group Member; and (ii) the Group Member which exported customer personal information to the Group Member in (i), so long as that Group Member exporting customer personal information is located in the UK; or (iii) in those cases where it is not possible to bring a claim against a Group Member in the UK, claims may be made against Verizon UK Limited.</p>
<p><b>How to complain to Verizon BCR Members</b></p>	<p>Details of how to complain to Verizon about the BCRs (including the UK BCR) is as set out in Appendix 5: EU Complaint Handling Procedure of the EU BCR-P.</p> <p>As indicated in Appendix 5 of the EU BCRs and specifically in a UK context, all complaints made under the UK BCR-P can be brought:</p> <ul style="list-style-type: none"> <li>• in writing to Verizon's Senior Director, International Privacy at <a href="mailto:emeadataprotection@verizon.com">emeadataprotection@verizon.com</a>, or</li> <li>• by writing to Senior Director, International Privacy, Verizon, Legal Department, Reading International Business Park, Basingstoke Road, Reading, RG2 6DA.</li> </ul> <p>While data subjects are encouraged to use the above points of contact, this is not mandatory.</p> <p>Where a complaint arises under this BCR-P, the Group Member will communicate the details of the complaint to the customer promptly and will act strictly in accordance with the terms of the contract between the</p>

	<p>customer and Verizon if the customer requires Verizon to deal with the complaint.</p> <p>In circumstances where a customer has disappeared, no longer exists or has become insolvent, individuals whose personal information is processed and transferred between Group Members on behalf of that customer under this BCR-P have the right to complain to Verizon and Verizon will deal with such complaints in accordance with the Complaint Handling Procedure.</p> <p>Individuals also have the right to complain to:</p> <ul style="list-style-type: none"><li>• the UK Information Commissioner; and/or</li><li>• the courts of the UK.</li></ul> <p>These rights will apply whether or not they have first made a complaint to Verizon.</p>
<b>How to complain to the UK Information Commissioner's Office about Verizon's UK BCR</b>	<p>Individuals have the right to make a complaint about Verizon's UK BCR to the ICO – for more information please see <a href="https://ico.org.uk/for-the-public/how-to-make-a-data-protection-complaint/">https://ico.org.uk/for-the-public/how-to-make-a-data-protection-complaint/</a></p> <p>Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF Telephone: 0303 123 1113 Textphone: 01625 545860 Monday to Friday, 9am to 4:30pm</p>
<b>How to bring a claim in the UK courts against Verizon UK Limited for redress and, where appropriate, compensation for a breach of the UK BCR Addendum by Verizon UK Limited and any Non-UK BCR Member</b>	<p>The individual court systems provide guidance on how to bring a claim in <a href="#">England and Wales</a>, <a href="#">Scotland</a> and <a href="#">Northern Ireland</a>.</p> <p>Citizens Advice provides information on taking legal action in <a href="#">England and Wales</a>, <a href="#">Scotland</a> and <a href="#">Northern Ireland</a>.</p> <p>Finally, you can find further information at:</p> <ul style="list-style-type: none"><li>• <a href="http://www.justice.gov.uk">www.justice.gov.uk</a> (England and Wales)</li><li>• <a href="http://www.scotcourts.gov.uk">www.scotcourts.gov.uk</a> (Scotland)</li><li>• <a href="http://www.courtsni.gov.uk">www.courtsni.gov.uk</a> (Northern Ireland)</li></ul>