



VERIZON BUSINESS GROUP

UK BINDING CORPORATE RULES PROCESSOR POLICY

Confidential

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INTRODUCTION TO THIS POLICY

This UK Binding Corporate Rules Processor Policy and its Appendices (together the "**Policy**") establish the approach taken by Verizon Business Group (previously referred to as Verizon Enterprise Solutions) ("Verizon") to the protection and management of Personal Information globally by Verizon UK BCR Processor group members ("**Group Members**") when Processing that information on behalf of a Controller Third Party. .

Verizon provides a cloud based platform to deliver IT, security, mobility and managed solutions to corporate and government Customers. It has a global network that reaches more than 150 countries, with Verizon Communications, Inc. as parent company.

In addition to other definitions provided under this Policy, the following further terms shall have the meanings ascribed to them:

"**Controller**" means the entity which, alone or jointly with others, determines the purposes and means of the Processing of Personal Information;

"**Customer**" means a Controller Third Party for which a Group Member acts a Processor;

"**Customer Personal Information**" means any Personal Information which Group Members process on behalf of a Customer (Controller) and which relates to the identified or identifiable individual who ultimately benefits from or makes use of the services contracted by the Customer (an end-user). Customer Personal Information does not include Personal Information for the operation of the service (i.e. billing data), which is processed by Group Members in their capacity as Controllers and is therefore excluded from this Policy;

"**Data Processing Agreement**" means a contract or any other type of legal instrument containing data Processing terms and conditions;

"**Employee**" means full or part-time, temporary or permanent employees, staff, individual contractors, secondees and interns of a Group Member.

"**GDPR**" means European Union (EU) Regulation 2016/679 (the General Data Protection Regulation) as it forms part of the law of England and Wales, Scotland and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2018, as modified by Schedule 1 to the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019 and 2020 and its successor laws;

"**ICO**" means the Information Commissioner;

"**Local Data Protection Law**" means any applicable local and national data protection law of a third country.

"**Personal Information**" means any Personal Information subject to UK Data Protection Law which relates to an identified or identifiable natural person;

"**Processing**" means any operation that Verizon performs on Personal Information, whether manually or by automatic means. References to the "collection", "use" and "transfer" of Personal Information are all elements of the definition of Processing;

"**Processor**" means the entity which processes Personal Information on behalf of the Controller;

"Profiling" means any form of automated Processing consisting of the Processing of Personal Information to evaluate certain personal aspects relating to an individual, in particular to analyse or predict aspects concerning that individual's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;

"Third Party" means an individual or entity which is not a Group Member;

"UK" means the United Kingdom; and

"UK Data Protection Law" means the United Kingdom's Data Protection Act 2018, the GDPR and regulations made thereunder as amended from time to time.

This Policy 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 UK Data Protection Law.

Group Members and their Employees must comply with and respect this Policy when Processing Customer Personal Information in their capacity as service providers to a Customer.

This Policy does not replace any specific data protection requirements that might apply to a business area or function.

This Policy and a list of Group Members is published on the website accessible at <https://www.verizon.com/about/privacy/binding-corporate-rules>.

PART I: BACKGROUND AND ACTIONS

WHAT IS DATA PROTECTION LAW?

UK Data Protection Law gives people the right to control how their Personal Information is processed. Under UK Data Protection Law, when an organisation processes Personal Information for its own purposes, that organisation is deemed to be a *Controller* of that information and is therefore primarily responsible for meeting the legal requirements.

When, on the other hand, an organisation processes information on behalf of a Third Party, that organisation is deemed to be a *Processor* of the information and the Third Party will be primarily responsible for meeting the legal requirements. So for example, where Verizon provides services to Customers as a global telecommunications provider, Verizon will be acting as a Processor in respect of the Customer Personal Information.

HOW DOES DATA PROTECTION LAW AFFECT VERIZON INTERNATIONALLY?

UK Data Protection Law does not allow the transfer of Personal Information to a third country outside the UK unless (i) the third country in question ensures an adequate level of protection; or (ii) there are appropriate safeguards in place to protect such personal data; or (iii) one or more of the derogations in the UK GDPR applies. Some of the countries in which Verizon operates are not considered to provide an adequate level of protection for individuals' data privacy rights under UK Data Protection Law and derogations are not applicable in many cases.

When Verizon acts as a Processor to a Customer, Verizon's Customer, as Controller, retains the responsibility to comply with UK Data Protection Law although Verizon in its capacity as Processor also has responsibilities under 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.

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.

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 Policy, 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. In addition, a Customer that has entered into a Data Processing Agreement with a Group Member that incorporates this Policy may enforce this Policy in the courts of the United Kingdom, 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 Policy 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.

WHAT IS VERIZON DOING ABOUT IT?

The purpose of this Policy is to set out a framework to satisfy the standards contained in UK Data Protection Law and, as a result, provide an adequate level of protection for all Customer Personal Information transferred to and processed by Group Members outside the UK as Processors or sub-processors.

Although it will be for each of Verizon's Customers to decide whether the commitments made by Group Members in this Policy provide adequate safeguards for the Customer Personal Information transferred to Group Members under the terms of its contract with Verizon, Verizon will apply this Policy whenever a Group Member processes Customer Personal Information as a Processor. Where Verizon's Customers rely upon this Policy as providing adequate safeguards, a link to this Policy will be incorporated into the

contract with that Customer. If a Customer of Verizon chooses not to rely upon this Policy, that Customer will have the responsibility to put in place other adequate safeguards to protect Customer Personal Information.

Verizon will apply this Policy globally where Group Members process Customer Personal Information as a Processor both manually and by automatic means and such Personal Information originates from the UK as identified in the contract with the Customer.

This Policy is legally binding and applies to all Group Members and their Employees where those Group Members process Customer Personal Information as a Processor both manually and by automatic means, and requires that Group Members who collect, process or transfer Customer Personal Information to provide services to a Customer comply with the Rules set out in **Part II** of this Policy together with the policies and procedures set out in the appendices in **Part III** of this Policy.

For completeness, Group Members (and their Employees) must comply with the UK Binding Corporate Rules Controller Policy when they process Personal Information as a Controller, or whenever they act as a Processor for a Controller which is a Group Member. Some Group Members may act as a Controller/Processor for another Group Member and as a Processor for a Third Party, and must therefore comply with this Policy and also the UK Binding Corporate Rules Controller Policy as appropriate.

WHAT PERSONAL INFORMATION DOES THIS POLICY COVER?

Personal Information processed under this Policy specifically relates to Customer Personal Information, including data stored and transmitted across the Verizon network in performing communication services under contracts with Customers, such as call detail records (CDRs), IP addresses, IP network information and geolocation data. Other Customer Personal Information processed under this Policy will include log in credentials, names, telephone numbers, email addresses, images and audio, call history. In connection with [telematics] services provided by Verizon Connect, Customer Personal Information processed under this Policy may also include vehicle unique identifier, tax status, social security number, tachograph card ID and tachograph records, driving licence information and driving history, .

FOR WHAT PURPOSES IS PERSONAL INFORMATION TRANSFERRED UNDER THIS POLICY?

Transfers of Customer Personal Information under this Policy 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.

Customer Personal Information may be transferred by a Group Member in the UK to Group Members located outside of the UK which consists of the following third countries: Australia, Brazil, Chile, Hong Kong, India, Malaysia, Mexico, Peru, the Philippines, Singapore, Taiwan, Thailand and the United States.

FURTHER INFORMATION

If you have any questions regarding the provisions of this Policy, your rights under this Policy or any other data protection issues you can contact Verizon's Director, International Privacy at the address below, who will either deal with the matter or forward it to the appropriate person or department within Verizon.

Attention:	Director, International Privacy
Email:	EMEAdataprotection@intl.verizon.com
Telephone:	+ 44 (0)118 905 5000
Address:	Verizon, Legal Department, Reading International Business Park, Basingstoke Road, Reading RG2 6DA

The Director, International Privacy is responsible for ensuring that changes to this Policy are notified in accordance with [Appendix 7](#).

If you are unhappy about the way in which Verizon has processed your Personal Information, Verizon has a separate complaint handling procedure which is set out in Part III, [Appendix 5](#).

PART II: PROCESSOR OBLIGATIONS

Part II of this Policy is divided into three sections:

- Section A addresses the basic principles that the Group Members must observe when they process Customer Personal Information as a Processor.
- Section B deals with the practical commitments made by the Group Members to the ICO when they process Customer Personal Information as a Processor on behalf of a Customer.
- Section C describes the third party beneficiary rights that the Group Members have granted to individuals in their capacity as a Processor under this Policy.

SECTION A: BASIC PRINCIPLES

RULE 1 – LAWFULNESS AND FAIRNESS

Rule 1A – Group Members will ensure that compliance with this Policy will not conflict with data protection laws where they exist.

Where this Policy applies and:

- Local Data Protection Law requires a higher level of protection than is provided for in this Policy, the Group Members acknowledge that it will take precedence over this Policy; or
- any applicable local legislation prevents Group Members from fulfilling, or has a substantial effect on its ability to comply with its obligations under this Policy, Group Members will follow the process set out in Rule 12.

Rule 1B – Group Members will co-operate and assist a Customer to comply with its obligations under UK Data Protection Law in a reasonable time and to the extent reasonably possible.

Group Members will, taking into account the nature of Processing and information available to the Group Member, within a reasonable time and to the extent reasonably possible, and as may be required under Data Processing Agreements with its Customers, assist Customers on request to comply with their obligations as Controllers under UK Data Protection Law. For example, Group Members will be transparent about sub-processor activities so that its Customers may correctly inform individuals.

RULE 2 – ENSURING TRANSPARENCY AND PROCESSING PERSONAL INFORMATION FOR A KNOWN PURPOSE ONLY

Rule 2A – Group Members will assist a Customer to comply with the requirement to explain to individuals at the time their Customer Personal Information is collected how that information will be processed.

The Group Members' Customers have a duty to explain to individuals, at the time their Customer Personal Information is collected, how that information will be processed. Group Members will provide such assistance and information to their Customers as may be required under the terms of their Data Processing Agreements with their Customers to comply with this requirement, for example, information about any sub-processors appointed by a Group Member to process Customer Personal Information on its behalf.

Rule 2B – Group Members will only process Customer Personal Information on behalf of and in accordance with the instructions of the Customer.

Group Members and their Employees will respect the Policy and only process Customer Personal Information in compliance with the terms of the Data Processing Agreement they have with their Customers in relation to such Processing, and which contains the terms required by UK Data Protection Law in so far as it relates to the engagement of a Processor, including in relation to transfers of Customer Personal Information to destinations outside the UK, unless required to do so by UK law. In such a case, Group Members will inform the Customers of that legal requirement before Processing takes place, unless that law prohibits such information on important grounds of public interest.

Group Members will immediately inform their Customers if, in their opinion, an instruction infringes UK Data Protection Law.

If, for any reason, a Group Member is unable to comply with this Rule or its obligations under this Policy in respect of any Data Processing Agreement it may have with a Customer, the Group Member will inform the Customer promptly of this fact. The Group Member's Customer may then suspend the transfer of Customer Personal Information to the Group Member and/or terminate the contract, depending upon the terms of its contract with the Group Member.

On the termination of the provision of the services related to data Processing to a Customer, Group Members and their sub-processors will act in accordance with the instructions of the Customer and return, destroy or store the Customer Personal Information, including any copies of the Customer Personal Information, in a secure manner or as otherwise required by the Customer. If Group Members and their sub-processors are required to destroy the Customer Personal Information, upon request from the Customer, they will certify that they have deleted any copies of the Customer Personal Information.

In the event UK law prevents a Group Member from returning the Customer Personal Information to a Customer or destroying it, the Group Member will ensure that such information remains confidential and will not process the Customer Personal Information otherwise than in accordance with the instructions of the Customer or as required by UK law.

RULE 3 – ENSURING DATA QUALITY

Rule 3 – Group Members will assist Customers to keep the Customer Personal Information accurate and up to date to the extent reasonably possible.

Group Members will comply with any instructions from their Customers in order to assist them to comply with their obligation to keep Customer Personal Information accurate and up to date.

When required to do so on instruction from their Customers, Group Members will delete, anonymise, update or correct Customer Personal Information. Where for technical reasons Customer Personal Information cannot be deleted, Group Members will advise their Customers accordingly and take steps to put such Customer Personal Information beyond Processing.

Group Members will notify other Group Members or any Third Party sub-processor to whom Customer Personal Information has been disclosed accordingly so that they can update their records.

In practice, when a Group Member acts for a Customer in its capacity as a cloud provider, the Group Member does not have access to the Customer Personal Information of its Customers and so, when acting in this capacity, the Group Member is unlikely to be required to delete, anonymise, update or correct such Customer Personal Information.

RULE 4 – HONOURING INDIVIDUAL RIGHTS

Rule 4 – Group Members will assist Customers to comply with the rights of individuals.

Group Members will act in accordance with the instructions of their Customers and undertake any appropriate technical and organisational measures to enable their Customers to comply with their

duty to respect the rights of individuals. In particular, if any Group Member receives a request from an individual exercising their rights, the Group Member will transfer such request promptly to the relevant Customer and not respond to such a request unless authorised to do so. Group Members will follow the steps set out in section 6 of the Individuals' Rights Procedure (see [Appendix 1](#)).

RULE 5 – SECURITY AND CONFIDENTIALITY

Rule 5A – Group Members will implement appropriate technical and organisational security measures required by UK Data Protection Law.

Where the Group Members provide a service to a Customer which involves the Processing of Customer Personal Information, the contract between the Group Member and its Customer imposes clear obligations dealing with the security of that information which will at least meet the requirements of UK Data Protection Law to ensure that the Group Member has in place appropriate technical and organisational security measures to ensure a level of security to Customer Personal Information appropriate to the risk presented by the Processing.

Group Members will adhere to the security and organisational measures specified in contracts with their Customers, and will assist Customers in implementing appropriate technical and organisational security measures to facilitate compliance with this Policy in practice (such as data protection by design and by default) so far as is reasonable taking into account the state of the art, cost of implementation, risks to individuals, nature, scope, context and purpose of the Processing.

Rule 5B – Group Members will notify Customers of any Data Protection Breach.

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Customer Personal Information transmitted, stored or otherwise processed (a "**Data Protection Breach**"), the person who becomes aware of the breach within the relevant Group Member will, without undue delay, notify databreachreport@one.verizon.com which is managed by the Director, International Privacy and the commercial legal, regulatory and security team (the "**Data Breach Panel**"). The Data Breach Panel will analyse the details of the Data Protection Breach and notify the Customer without undue delay and in accordance with the terms of its contract with that Customer.

If sub-processors are appointed in accordance with Rule 5C below, sub-processors will inform the Customer and the Processor Group Member of any Data Protection Breach without undue delay.

Data Protection Breaches suffered by Group Members and Third Party sub-processors, and the facts, the effects of such incidents and the remedial action taken, will be documented in a Data Protection Breach report which will be available to the Customer on request.

Rule 5C – Group Members will comply with the requirements of a Customer regarding the appointment of any internal and external sub-processor.

Group Members will inform their Customers where Processing undertaken on its behalf will be conducted by an internal and external sub-processor, and will comply with the particular requirements of a Customer with regard to the appointment of sub-processors as set out under the terms of their contract with that Customer, and in particular will obtain prior informed specific or general written authorisation of the Customer regarding the appointment of any sub-processors. Where the Customer has provided general written authorisation, Group Members will ensure that up to date information regarding their appointment of sub-processors is available to those Customers at all times so that Customers have the opportunity to object before the data have been transferred to a new sub-processor. If, on reviewing this information, a Customer objects to the appointment of a sub-processor to process Customer Personal Information on its behalf, that Customer will be entitled to take such steps as are consistent with the terms of its contract with the Group Member and as referred to in Rule 2B of Part II of this Policy (i.e. the Group Member's Customer may then suspend the transfer of Customer Personal Information to the Group Member and/or terminate the contract, depending upon the terms of its contract with the Group Member).

Rule 5D – Group Members will ensure that internal and external sub-processors undertake to comply with provisions which are consistent with (i) the terms in its contracts with its Customers and (ii) this Policy, and in particular that the sub-processor will adopt appropriate and equivalent security measures.

Group Members must only appoint internal and external sub-processors who provide sufficient guarantees in respect of the commitments made by them in this Policy. In particular, such sub-processors must be able to provide appropriate technical and organisational measures that will govern their Processing of the Customer Personal Information to which they will have access in accordance with the terms of the Group Member's contract with its Customer.

To comply with this Rule, where a sub-processor has access to Customer Personal Information covered by this Policy, Group Members will take steps to ensure that they have in place appropriate technical and organisational security measures to safeguard the Customer Personal Information and will impose strict contractual obligations in writing on the sub-processor that comply with UK Data Protection Law. Those requirements include:

- commitments on the part of the sub-processor regarding its assistance in the compliance with UK Data Protection Law, data quality, transparency and purpose limitation principles, individuals' rights and security of that information, consistent with those contained in this Policy (and in particular, and without limitation, Rules 1, 2A, 2B, 3, 4, 5A and 5B above) and with the terms of the contract the Group Member has with its Customer in respect of the Processing in question;
- that the sub-processor will act only on the Group Member's instructions when Processing Customer Personal Information;
- adequate safeguards (under UK Data Protection Law) with respect to transfers of Customer Personal Information to a Third Party sub-processor established in a country outside the UK that does not ensure an adequate level of protection for individuals' data privacy rights; and
- such obligations as may be necessary to ensure that the commitments on the part of the sub-processor reflect those made by the Group Member in this Policy as may be applicable to sub-processors.

SECTION B: PRACTICAL COMMITMENTS

RULE 6 – COMPLIANCE AND ACCOUNTABILITY

Rule 6A – Group Members will have appropriate staff and support to ensure and oversee privacy compliance with this Policy throughout the business and will make available to the Customer all necessary information to demonstrate compliance.

Verizon has appointed its Director, International Privacy as the person to oversee and ensure compliance with this Policy, supported by legal and compliance officers at regional and country level who are responsible for overseeing and enabling compliance with this Policy on a day to day basis. A summary of the roles and responsibilities of Verizon's privacy team is set out in [Appendix 2](#).

Rule 6B – Group Members Processing Customer Personal Information will maintain a written (including in electronic form) record of their Processing activities and make that record available to the ICO on request.

The data processing records maintained by Group Members will contain:

- the Group Member's name and contact details;
- the name and contact details of each Customer on whose behalf the Group Member

processes Customer Personal Information and, where applicable, the Customer's representative and data protection officer;

- the categories of Processing carried out on behalf of each Customer;
- details of the third country or countries to which Customer Personal Information is transferred, including the identification of that third country or international organisation and the documentation of suitable safeguards in the event of transfers under the second subparagraph of Article 49(1) of the UK GDPR; and
- where possible, a general description of the technical and organisational security measures used to protect Customer Personal Information.

RULE 7 – TRAINING

Rule 7 – Group Members will provide appropriate training to employees who have permanent or regular access to Customer Personal Information, who are involved in the Processing of Customer Personal Information or in the development of tools used to process Customer Personal Information in accordance with the Privacy Training Requirements attached as Appendix 3.

RULE 8 – AUDIT

Rule 8 – Group Members will comply with the Audit Protocol set out in Appendix 4.

RULE 9 – COMPLAINT HANDLING

Rule 9 – Group Members will comply with the Complaint Handling Procedure set out in Appendix 5.

RULE 10 – COOPERATION WITH THE ICO

Rule 10 – Group Members will comply with the Co-operation Procedure set out in Appendix 6.

RULE 11 – UPDATE OF THE POLICY

Rule 11 – Group Members will comply with the Updating Procedure set out in Appendix 7.

RULE 12 – ACTION WHERE NATIONAL LEGISLATION PREVENTS COMPLIANCE WITH THE POLICY

Rule 12A – Group Members will ensure that where they believe that any legislation applicable to them prevents them from fulfilling the instructions received from the Customer or their obligations under this Policy or contract with the Customer, Group Members will promptly inform (unless otherwise prohibited by law):

- the Customer, as provided for in Rule 2B;
- Verizon's Director, International Privacy;
- Verizon UK Limited; and
- the ICO.

Rule 12B – Group Members will ensure that, where they receive a legally binding request from a law enforcement agency or state security body for disclosure of Customer Personal Information transferred outside the UK under this Policy, they will, unless prohibited from doing so by the requesting authority:

- **put the request on hold; and**
- **promptly notify the Customer and the ICO.**

Where Group Members outside the UK receive a legally binding request for disclosure of information transferred outside the UK under this Policy and are prohibited by a law enforcement authority from putting the request on hold and/or from notifying the ICO, Group Members will:

- use their best efforts to obtain a waiver of this prohibition in order to communicate as much information as they can as soon as possible to the ICO including information about the data requested, the requesting body and the legal basis for disclosure; and
- demonstrate to the ICO the steps they followed to deal with the request in accordance with this Policy.

If the Group Member is not able to obtain a waiver of the prohibition to notify the ICO, the Group Member will provide to the ICO on an annual basis general information about the nature and number of such requests that it receives, type of data requested and the requesting body if possible.

In any event, Group Members will ensure that any transfers of Customer Personal Information under this Policy that it makes to a public authority are not massive, disproportionate or indiscriminate in a manner that would go beyond what is necessary in a democratic society.

SECTION C: THIRD PARTY BENEFICIARY RIGHTS

- (a) Where Customer Personal Information is processed under this Policy by a UK Group Member acting as a Processor under a Data Processing Agreement with a Customer, that individual whose Customer Personal Information is transferred under the terms of that Data Processing Agreement to a Group Member outside the UK, will have the rights as Third Party beneficiaries, in accordance with The Contract (Rights of Third Parties) Act 1999, to enforce Rules 1B, 2, 3, 4, 5, 9, 10, 12, the right to access the Policy via <https://www.verizon.com/about/privacy/BCRparticipants>, or to obtain a hard copy of the Policy as well as a list of the Group Members bound by this Policy, and the right to enforce the provisions in Section C (a), (c), (d), (e), (f) (g) and (h) granting third-party beneficiary rights and setting the liability and jurisdiction rules under the Policy.
- (b) Where Customer Personal Information is processed under this Policy by a UK Group Member acting as a Processor under a Data Processing Agreement with a Customer and where: (i) the individual whose Customer Personal Information is transferred as described in (a) above is unable to bring a claim against the Customer because the Customer has factually disappeared or ceased to exist in law or has become insolvent; and (ii) no successor entity has assumed the entire legal obligations of the Customer by contract or by operation of law, that individual will have the rights as Third Party beneficiary in accordance with The Contract (Rights of Third Parties) Act 1999, to enforce Rules 1B, 2, 3, 4, 5, 9, 10, 12, the right to access the Policy via <https://www.verizon.com/about/privacy/binding-corporate-rules>, or to obtain a hard copy of the Policy as well as a list of the Group Members bound by this Policy, and the right to enforce the provisions in Section C (b), (c), (d), (e), (f) (g) and (h) granting third-party beneficiary rights and setting the liability and jurisdiction rules under the Policy.
- (c) This Policy ensures that the individuals referred to in Section C (a) and (b) above are able to enforce the rights outlined in those sections by:
- (i) *making complaints*: individuals may make complaints to a Group Member (in accordance with the Complaint Handling Procedure set out in [Appendix 5](#)) and to the ICO in the UK; and/or

- (ii) *bringing proceedings* against Verizon UK Limited in the courts of the United Kingdom.
- (d) Where the Group Member and the Customer involved in the same Processing are found responsible for any damage caused by such Processing, the individuals referred to in Section C(a) and (b) above will be entitled to receive compensation for the entire damage directly from the Group Member.
- (e) The individuals referred to in Section C (a) and (b) above may also seek appropriate redress from Verizon UK Limited including the remedy of any breach of the provisions in those sections, and where appropriate, receive compensation from Verizon UK Limited for the entirety of any damage whether material or non-material suffered as a result of a breach of those provisions by:
 - (i) any Group Member outside the UK acting as a Processor; or
 - (ii) any Third Party sub-processor which is established outside the UK and which is acting on behalf of a Group Member.
- (f) Verizon UK Limited will ensure that any necessary action is taken to remedy any breach of this Policy by a Group Member outside the UK or any Third Party sub-processor which is established outside the UK and which is Processing Customer Personal Information on behalf of a Customer.
- (g) For the avoidance of doubt, individuals shall benefit from the third party beneficiary rights as described in this Section C and the courts of the United Kingdom or the ICO shall have jurisdiction as if the breach of the provisions described in this Section C or any of them was caused by Verizon UK Limited in the UK. Verizon UK Limited may not rely on a breach by a sub-processor (internal or external) of its obligations in order to avoid its own liabilities.
- (h) In the event of a claim being made under this Section C in which an individual has suffered damage as described above and where that individual can demonstrate that it is likely that the damage has occurred because a breach of this Policy, the Group Members have agreed that the burden of proof to show that a Group Member outside the UK (or any Third Party sub-processor which is established outside the UK and which is acting on behalf of a Group Member) is not responsible for the breach, or that no such breach took place, will rest with Verizon UK Limited.

PART III: APPENDICES

Appendix 1

UK Individuals' Rights Procedure

1. INTRODUCTION

- 1.1 When a Group Member processes Personal Information for their own purposes, the Group Member is deemed to be a *Controller* of that information and is therefore primarily responsible for meeting the requirements of UK Data Protection Law in relation to the exercise of individuals' rights.
- 1.2 All individuals whose Personal Information is processed by a Group Member acting as Controller, and transferred between Group Members within the scope of the UK Binding Corporate Rules Controller Policy have the right to:
 - (a) be informed by the Group Member whether any Personal Information about them is being processed by the Group Member and, if the Group Member does process their Personal Information, they are entitled to access it (this is known as the right of **access**); and
 - (b) rectify, erase, restrict, port and/or object to the Processing of their Personal Information.
- 1.3 Requests to exercise these rights will be dealt with in accordance with the terms of this UK Individuals' Rights Procedure ("**Procedure**").
- 1.4 This Procedure explains how Group Members deal with requests relating to Personal Information that fall into the categories in section 1.2 above (referred to as a "**valid request**" in this Procedure). Where Local Data Protection Law differs from this Procedure and requires a higher level of protection for personal data, the law which affords the higher protection for data subjects will prevail.
- 1.5 Information about how individuals may exercise the rights described in section 1.2 above is also set out in the fair Processing statements provided to individuals by Group Members.
- 1.6 Requests from individuals relating to the rights described in section 1.2 above may be made via the Verizon website at <https://www.verizon.com/about/international/privacy/data-subject-rights>, by email to emeadataprotection@verizon.com or orally. Where an oral request is made, Verizon will document the request and provide a copy to the individual making the request before dealing with it.

2. INDIVIDUALS' RIGHTS

- 2.1 An individual making a valid request to a Group Member when the Group Member is a Controller of the Personal Information requested is entitled to:
 - (a) be informed whether the Group Member is Processing Personal Information about that individual;
 - (b) be given a description of:
 - (i) the purpose for which the Personal Information is being processed and the categories of Personal Information concerned;
 - (ii) the recipients or categories of recipients to whom the information is, or may be, disclosed by Group Members, including recipients located

outside the UK;

- (iii) the period for which the Personal Information will be stored, or the criteria used to determine that period;
 - (iv) the existence of the rights to rectification, erasure, restriction of and to object to Processing and to complain to the ICO;
 - (v) the source of the Personal Information and the categories of Personal Information concerned, if it was not collected from the individual;
 - (vi) the safeguards in place where Personal Information is transferred from the UK to a country outside the UK;
 - (vii) the existence of any decision-making undertaken by automated means, including Profiling, and at least in those cases, meaningful information about the logic involved in as well as the significance and consequences of such Processing;
- (c) be provided with a copy of the Personal Information held by Group Members. If the request is made by email, the information shall be provided via email, unless the individual making the request indicates otherwise;
 - (d) require the rectification, erasure, restriction and portability of their Personal Information;
 - (e) not to be subject to a decision based solely on automated Processing, including Profiling, which produces legal or similar significant effects; and/or
 - (f) object to the Processing of his or her Personal Information.

3. RECEIVING A REQUEST

- 3.1 If a Group Member, including a Group Member outside the UK, receives any request from an individual relating to the rights described in section 1.2 above, this must be passed to the Director, International Privacy immediately upon receipt indicating the date on which it was received together with any other information which may assist the Director, International Privacy to deal with the request. Such requests can be sent to emeadataprotection@verizon.com.
- 3.2 The Director, International Privacy will make an initial assessment of the request to decide whether it is a valid request and whether confirmation of identity or any further information is required. The request does not have to be official or mention data protection law to qualify as a valid request.
- 3.3 When the individual making the valid request is not an Employee of a Group Member and the Group Member has reasonable doubts concerning the identity of the individual, the Group Member may request such information that it may reasonably require in order to confirm the identity of the individual making the request.
- 3.4 Group Members must deal with a valid request without undue delay and in any event within 1 month of its receipt. Group Members may extend this period, by up to two further months if necessary, taking into account the complexity and number of the requests. Where a Group Member extends the period in which it will deal with a valid request, the Group Member will inform

the individual of the extension within one month of receipt of their request, together with the reasons for the delay.

- 3.5 The Director, International Privacy will contact the individual in writing to confirm receipt of the valid request, seek confirmation of identity or further information (e.g. clarification on the Processing activities to which the request relates), if required, or decline the request in accordance with section 4 below.

4. DECLINING VALID REQUESTS

- 4.1 A valid request may be refused on the following grounds:

- (a) where the request is made to a UK Group Member and relates to the Processing of Personal Information by that Group Member, if:
 - (i) the refusal is consistent with UK Data Protection Law; or
 - (ii) the Group Member demonstrates that the request is manifestly unfounded or excessive; or
- (b) where the valid request is made to a Group Member outside the UK and the Director, International Privacy is unable to deal with the request in accordance with section 3, the relevant Group Member outside the UK will only refuse the request if the grounds for such refusal are consistent with UK Data Protection Law.

- 4.2 The Director, International Privacy on behalf of the Group Member will within one month of the receipt of the request inform the individual of the refusal of the request, the reason for such refusal, and will also inform the individual of his/her right to complain to the ICO or seek a judicial remedy in relation to the refusal.

5. GROUP MEMBER'S RESPONSE

- 5.1 The Director, International Privacy will arrange a search of all electronic and paper filing systems relevant to the request.
- 5.2 The Director, International Privacy may refer any complex cases to the Chief Privacy Officer for advice, particularly where the request includes information relating to third parties or where the release of Personal Information may prejudice commercial confidentiality or legal proceedings.
- 5.3 Where the Valid Request is a request for subject access, the information requested will be collated by the Director, International Privacy into a readily understandable format (internal codes or identification numbers used by Group Members that correspond to Personal Information shall be translated before being disclosed). A covering letter will be prepared by the Director, International Privacy which includes information required to be provided in response to the valid request.
- 5.4 If the valid request is for the erasure, rectification, restriction or portability of personal data, or is an objection to Processing or relates to the right not to be subject to automated decision-making where the Group Member is the Controller for that Personal Information, such a request must be considered and dealt with as appropriate by the Director, International Privacy. In particular:
- (a) if the valid request is advising of a change or any inaccuracy in an individual's personal information, where the Group Member is the Controller for that personal information, such information must be rectified or updated accordingly if the Group Member is satisfied that there is a legitimate basis for doing so;

- (b) when, pursuant to a valid request, a Group Member erases, anonymises, updates, corrects or restricts the Processing of Personal Information, either in its capacity as Controller or on instruction of a Customer when it is acting as a Processor in accordance with section 6 below, that Group Member will notify other Group Members or any sub-processor to whom the Personal Information has been disclosed accordingly so that they can also update their records; and
- (c) if the valid request made to a Group Member as a Controller is to erase that individual's Personal Information in accordance with the provisions of UK Data Protection Law, the matter will be assessed by the Director, International Privacy . Where the Processing undertaken by the Group Member is required or permitted by law, or is necessary for the exercising of the right of freedom of expression and information, the request will be refused.

5.5 All queries relating to this Procedure are to be addressed to the Director, International Privacy .

6. **REQUESTS MADE TO A GROUP MEMBER WHERE the Group Member Is A PROCESSOR**

- 6.1 When a Group Member processes information on behalf of a Customer (for example, to provide a service) the Group Member is deemed to be a Processor of the information and it is the Customer's duty to handle valid requests. When necessary, the Group Member will support the Customer in fulfilling its obligations, pursuant to the following sections.
- 6.2 While the Group Member, as the Processor, is not responsible for the handling of valid requests according to UK Data Protection Law, an individual may attempt to communicate their valid request directly to a Group Member instead of the Customer. In such case, to the extent legally permitted and as set out in the Data Processing Agreement the Group Member has with its Customers, the Group Member will promptly notify Customer if the Group Member receives a valid request. Certain data protection obligations are passed to Verizon in the contracts which Verizon has with its Customer and Verizon must act in accordance with the instructions of its Customer and undertake any reasonably necessary measures to enable its Customer to comply with their duty to respect the rights of individuals. This means that if any Group Member receives a request from an individual to exercise his or her rights under UK Data Protection Law in the Group Member's capacity as a Processor on behalf of a Customer, that Group Member must transfer such request promptly to the relevant Customer and not respond to the request unless authorised by the Customer to do so.
- 6.3 When a Group Member (acting as a Processor) is notified by the Customer of a request for erasure, rectification or restriction in relation to Personal Information that had been previously disclosed by a Customer, the Group Member will update its records accordingly.
- 6.4 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 the UK Processor Policy, have the right to raise a valid request to the Group Member and the Group Member will deal with such requests in accordance with sections 1 to 5 of this UK Individuals' Rights Procedure.

Appendix 2

UK Compliance Structure

1. OVERVIEW

- 1.1 Verizon's Organisational Privacy Structure (the "**OPS**") is a global network of privacy professionals. The structure of the OPS is shown on the attached diagram (Annex 1).
- 1.2 The OPS is led by the Vice President & Deputy General Counsel, Chief Privacy Officer (the "**CPO**"), who reports to the Executive Vice President & Chief Legal Officer who has responsibility for all legal and corporate security functions within Verizon.
- 1.3 The CPO oversees the US Privacy Team and the International Privacy Team. The latter covers all regions where Verizon has a presence other than the US, principally Europe, Latin America, Asia Pacific and Canada. The responsibilities of each team in the OPS and its reporting channels are clearly identified.

International

The Director, International Privacy

- 1.4 The Director, International Privacy is based in Verizon's International HQ in the UK, and is responsible for all aspects of privacy compliance and Processing pursuant to the GDPR, UK Data Protection Law and Local Data Protection Laws throughout Verizon's Group Members.
- 1.5 The International Privacy Team comprises of 4 privacy counsel based in Reading in the UK,. All report to the Director, International Privacy and deal with matters of compliance outside the US. The International Privacy Team is further supported by a legal counsel and privacy specialist based in Dublin.
- 1.6 More specifically, the Director, International Privacy's responsibilities include:
 - ensuring Verizon's compliance with Verizon's Binding Corporate Rules Controller and Processor Policies;
 - in cases where the Internal Audit Department identifies areas of non-compliance with Verizon's Binding Corporate Rules Controller and Processor Policies, instructing the Verizon Compliance team to correct these within a reasonable timescale;
 - reviewing new products and services from a privacy perspective to ensure compliance with international privacy laws;
 - maintaining and updating Verizon's privacy policies and privacy-related instructions;
 - counselling business units on internal and external privacy principles and requirements;
 - ensuring Verizon's compliance with international privacy laws, regulations, principles and policies;
 - responding to regulatory bodies and industry organisations regarding opinions, proposals and drafts of proposed changes to international privacy legislation and policy;
 - working with Verizon Security on security issues which relate to Customer or Employee privacy;
 - providing face-to-face and online privacy training where Employees (in teams such as Human Resources, Sales, Customer Services and Billing) are required to have a heightened awareness of international privacy issues;

- providing privacy training and updates to Employees on existing and new privacy law and policies, including the Binding Corporate Rules Controller and Processor Policies;
- assisting the commercial legal team in contract negotiations and ensuring that Verizon's contracts reflect the requirements of international privacy law; and
- ensuring compliance with all in-country elements of international privacy law including, where necessary, ensuring that data protection registrations and notifications are complete and permits for the international transfer of personal data are obtained.

1.7 The Director, International Privacy reports to the CPO and, in her role as Data Protection Officer, to the Executive Vice President & Chief Legal Officer. The Director, International Privacy therefore enjoys the highest management support in exercising her functions.

International Regulatory Officers

1.8 In addition to the International Privacy Team, Verizon has a team of in-country International Regulatory Officers who are responsible for data protection compliance in European countries where Verizon operates and the UK. Regulatory Officers assist the International Privacy Team and local Employees with specific in-country privacy issues and are a conduit for communication between the International Privacy Team, the ICO and other local competent supervisory authorities where required.

US Privacy Team: Verizon's privacy structure in the US

1.9 The Verizon US Privacy Team serves as a centralised privacy and compliance function within the US. The US Privacy Team also provides support to the Chief Information Security Officer and the International Privacy Team when appropriate on matters that cross multiple regions.

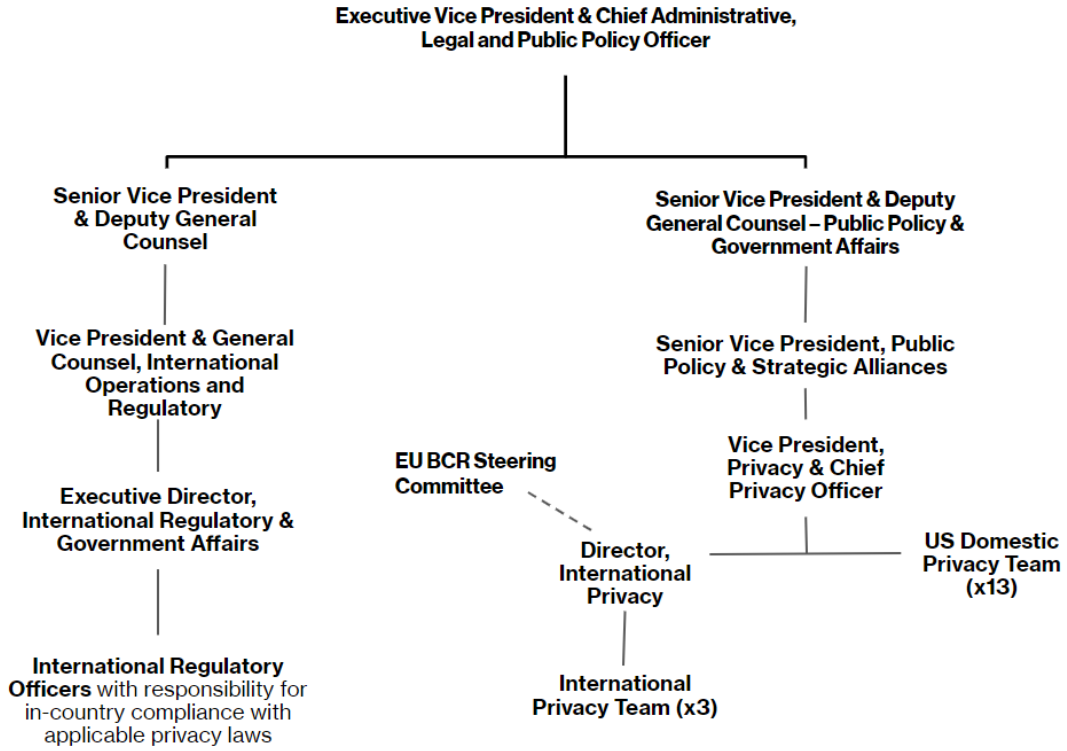
1.10 The Verizon US Privacy Team is responsible for:

- reviewing new products and services relating to US privacy matters;
- maintaining and updating Verizon's US-facing privacy policies and privacy-related instructions to ensure compliance with US law;
- counselling business units on internal and external privacy principles and requirements;
- ensuring Verizon's compliance with US privacy laws, regulations, principles and policies;
- responding to federal and state legislative and regulatory proposals that address the issue of privacy;
- working with Verizon Security on security issues which relate to US Customer or Employee privacy; and
- providing privacy training and updates to Employees on existing and new privacy law and policies.

1.11 In addition to the functions described above, the CPO sits on the company's Compliance Council and the Executive Security Council (VESC). The CPO also reports to the Audit Committee of the Board of Directors and regularly meets with Verizon's Internal Audit team.

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Annex 1 – Verizon Organisational Privacy Structure



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Appendix 3

Privacy Training Requirements

1. BACKGROUND

- 1.1 The purpose of this Privacy Training Requirements document is to provide a summary of how Group Members train their Employees on the requirements of the Binding Corporate Rules Controller and Processor Policies (the "**Policies**").
- 1.2 Verizon's Corporate Compliance Department has overall responsibility for compliance training within Verizon, including the delivery and tracking of Verizon's privacy training programs. Training on the Policies is overseen by the Director, International Privacy, the Chief Privacy Officer and in-region privacy professionals around the globe.
- 1.3 All Verizon Employees receive periodic training on privacy and data protection (the "**General Privacy training**") and on Verizon's Code of Conduct. Training on other specific privacy-related matters such as Records Management, HIPAA Privacy and Security, or country-specific data protection is also provided on a need-to-know basis.
- 1.4 Employees who have permanent or regular access to Personal Information, or who are involved in the Processing of Personal Information or in the development of tools to process Personal Information, receive additional tailored training on international privacy principles, including on the Policies (the "**International Privacy training**") and specific data protection issues relevant to their role. This training is further described below and is repeated on a regular basis.
- 1.5 The General Privacy training and the International Privacy training are together referred to in this document as the "**Privacy and compliance training program**".

2. OVERVIEW OF TRAINING

- 2.1 All Group Members' Employees are required to participate in the General Privacy training program once every two years. The program is called "*Privacy and Information Security*" and alternates with biennial training on Verizon's Code of Conduct, which also covers privacy obligations.
- 2.2 The General Privacy training covers a range of subjects, including data privacy, data protection breaches, and Verizon's Privacy and Information Security policies and procedures.
 - 2.2.1 In addition to the yearly training described in section 2.1 and 2.2, where relevant to an Employee's role, training will cover the following procedures under the Policies.
 - (a) Individuals' Rights Procedure
 - (b) Audit Protocol
 - (c) Updating Procedure
 - (d) Cooperation Procedure
 - (e) Complaint Handling Procedure

3. AIMS OF THE PRIVACY AND COMPLIANCE TRAINING PROGRAM

- 3.1 The aim of Verizon's Privacy and compliance training program is to help create and maintain an environment in which:
 - 3.1.1 Employees have an understanding of the basic principles of data privacy, confidentiality, and information security;
 - 3.1.2 Employees understand Verizon's Privacy and Information Security policies and procedures; and

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- 3.1.3 Employees in positions with permanent or regular access to Personal Information, or who are involved in the Processing of Personal Information or in the development of tools to process Personal Information, receive appropriate training, as described in section 4, to enable them to process Personal Information in accordance with the Policies.
- 3.2 General data protection and privacy training for new joining Employees
 - 3.2.1 New Employees must complete the General Privacy training, the International Privacy training (if required) and training on Verizon's Code of Conduct shortly after joining Verizon. The Code of Conduct requires Employees to follow Verizon's Privacy and Information Security policies and procedures.
- 3.3 General data protection and privacy training for all Employees
 - 3.3.1 Employees worldwide receive the General Privacy training. This training covers basic data privacy rights and principles and data security in line with the requirements of the Policies. It is designed to be both informative and user-friendly, generating interest in the topic. Completion of the course is monitored and enforced by Verizon's Corporate Compliance Department, which drives 100% completion by all required Employees and is accountable to the Audit Committee of the Board of Directors.
 - 3.3.2 All Employees also benefit from:
 - (a) Code of Conduct training, which provides a detailed review of Verizon's commitment to ethical behaviour, including specific discussion of key ethics and compliance risks, privacy and security; and
 - (b) ad-hoc communications consisting of emails, awareness messaging placed on Verizon's intranet pages, and information security posters displayed in offices which convey the importance of information security and data protection issues relevant to Verizon, including for example, social networking, remote working, engaging data Processors and the protection of confidential information.

4. FURTHER INFORMATION

Any queries about training under the Policies should be addressed to the Corporate Compliance Department, which can be contacted at: Verizon.Compliance@one.verizon.com.

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Appendix 4

UK Audit Protocol

1. BACKGROUND

- 1.1 Group Members are required to audit their compliance with the UK Binding Corporate Rules Controller Policy ("**UK Controller Policy**") and the UK Binding Corporate Rules Processor Policy ("**UK Processor Policy**") (together the "**Policies**") and satisfy certain conditions in so doing, and this document describes how Group Members deal with such requirements.
- 1.2 The role of Verizon's Director, International Privacy in the International headquarters in the UK and the network of Regulatory Officers is to provide guidance about the Processing of Personal Information subject to the Policies and to assess the Processing of Personal Information by Group Members for potential privacy-related risks. The Processing of Personal Information is, therefore, subject to detailed review and evaluation on an on-going basis. Accordingly, although this Audit Protocol describes the formal assessment process adopted by Group Members to ensure compliance with the Policies as required by the ICO, this is only one way in which Group Members ensure that the provisions of the Policies are observed and corrective actions taken as required.

2. APPROACH

- 2.1 Overview of audit
 - 2.1.1 Compliance with the Policies is overseen on a day to day basis by the Director, International Privacy.
 - 2.1.2 The Internal Audit Department will be responsible for performing and/or overseeing independent audits of compliance with the Policies and will ensure that such audits address all aspects of the Policies. The Internal Audit Department will be responsible for ensuring that any issues or instances of non-compliance are brought to the attention of the Director, International Privacy and that any corrective actions to ensure compliance take place within a reasonable timescale.
 - 2.1.3 To the extent that a Group Member acts as a Processor, audits of compliance with the commitments made in the UK Processor Policy may also be carried out by or on behalf of the Group Members' Customers in accordance with the terms of the Data Processing Agreement the Group Member has with a Customer in respect of such Processing, and such audits may (at the Customer's discretion) also extend to any sub-processors acting on a Group Member's behalf in respect of such Processing. The ability to audit such sub-processors will be carried out in accordance with the terms of the contract between the Group Member and the sub-processors which includes the right for Customers of Group Members to audit sub-processors.
- 2.2 Timing and scope of audit
 - 2.2.1 Audit of the Policies will take place:
 - (a) annually in accordance with the Group Member's audit procedure(s); and/or
 - (b) more frequently, at the request of the Director, International Privacy.
 - 2.2.2 To the extent that a Group Member processes Personal Information on behalf of a third party ("**Third Party Controller**"), audit of the UK Processor Policy will take place as required under the contract in place between that Group Member and that Third Party Controller.
 - 2.2.3 The scope and coverage of the audit performed will be determined by the Internal Audit Department based on a risk-based analysis which will consider relevant criteria, for example: areas of known non-compliance; areas of current regulatory focus; areas of specific or new risk for the business; areas with changes to the systems or processes used to safeguard information;

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areas where there have been previous audit findings or complaints; the period since the last review; the nature, method and location of the Personal Information processed; IT systems, applications and databases; onward transfers; and issues arising from conflict of laws or vendor management.

2.2.4 In the event that a Third Party Controller on whose behalf a Group Member processes Personal Information exercises its right to audit the Group Member for compliance with the UK Processor Policy, the scope of the audit shall be limited to the data Processing facilities, files, documents (where appropriate) and activities relating to that Controller. Group Members will not provide a Controller with access to systems which process Personal Information of other Controllers.

2.3 Auditors

2.3.1 Audit of the procedures and controls in place to give effect to the commitments made in the Policies will be undertaken by Verizon's Internal Audit Department, and Group Members may use other accredited internal/external auditors as determined by the Group Members.

2.3.2 In the event that a Third Party Controller on whose behalf a Group Member processes Personal Information exercises their right to audit the Group Member for compliance with the UK Processor Policy, such audit may be undertaken by that Controller or by independent, accredited auditors selected by that Controller as stipulated in the contract between Verizon and that Controller, where applicable, in agreement with the ICO.

2.4 Report

2.4.1 On completion of the audit, the report and findings will be made available to the Director, International Privacy and the Executive Director, Legal & Regulatory Affairs Europe (also responsible for the UK). A summary of the findings will be provided to the Management Committee in the UK with details of any remedial action required, recommendations and timescales for remedial action to be undertaken. Where appropriate, the result may be communicated to the board of the ultimate parent of Verizon Communications, Inc.

2.4.2 Upon request, Group Members have agreed to:

(a) provide copies of the results of any audit of the Policies to the ICO who will upon receiving the audit results be reminded of its duty of professional secrecy under UK Data Protection Law; and

(b) to the extent that an audit performed under section 2.2.2 above relates to Personal Information processed by Group Members on behalf of a Third Party Controller, to make the results of any audit of compliance with the UK Processor Policy available to that Controller.

2.4.3 Verizon's Director, International Privacy will be responsible for liaising with the ICO for the purpose of providing the information outlined in section 2.4.2(a).

2.4.4 In addition, all Group Members agree to be audited by the ICO in accordance with applicable audit procedures of the ICO, who will be reminded of its duty of professional secrecy under UK Data Protection Law.

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Appendix 5

UK Complaint Handling Procedure

1. INTRODUCTION

- 1.1 The purpose of this UK Complaint Handling Procedure is to explain how complaints brought by an individual whose Personal Information is processed by Group Members under the UK Binding Corporate Rules Controller Policy (“**UK Controller Policy**”) and the UK Binding Corporate Rules Processor Policy (“**UK Processor Policy**”) (together the “**Policies**”) are dealt with.

2. HOW INDIVIDUALS CAN BRING COMPLAINTS

- 2.1 All complaints made under the Policies whether a Group Member is Processing information on its own behalf or on behalf of a Customer can be brought in writing to Verizon's Director, International Privacy at emeadataprotection@verizon.com or by writing to Director, International Privacy, Verizon, Legal Department, Reading International Business Park, Basingstoke Road, Reading, RG2 6DA. When an oral complaint is made, the complaint shall be recorded by Verizon and verified with the individual making the complaint before taking any further action.

3. WHO HANDLES COMPLAINTS?

3.1 Complaints where a Group Member is a Controller

- 3.1.1 Verizon's Director, International Privacy will handle all complaints arising under the UK Controller Policy in respect of the Processing of Personal Information where a Group Member is the Controller of that information. Verizon's Director, International Privacy will liaise with relevant business units to investigate the complaint. The Director, International Privacy will coordinate a response.

3.1.2 What is the response time?

Verizon's Director, International Privacy will acknowledge receipt of a complaint to the individual concerned within 5 working days, investigating and making a substantive response within one month. If, due to the complexity of the complaint and number of requests, a substantive response cannot be given within this period, Verizon's Director, International Privacy will advise the complainant of the reason for the delay within one month of receipt of the complaint, and provide a reasonable estimate (not exceeding two further months from the date on which the individual was notified of the extension) for the timescale within which a response will be provided.

3.1.3 When a complainant disputes a finding

If the complainant disputes the response of the Director, International Privacy (or the individual or department within Verizon dealing with the complaint) or any aspect of a finding, and notifies Verizon accordingly, the matter will be referred to the Vice President, Deputy General Counsel Privacy & Chief Privacy Officer (“**CPO**”) who will review the case and advise the complainant of his/her decision either to accept the original finding or to substitute a new finding. The CPO will respond to the complainant within one month of the referral. If, due to the complexity of the complaint and number of requests, a substantive response cannot be given within this period, the CPO will advise the complainant of the reason for the delay within one month of receipt of the referral, and provide a reasonable estimate for the timescale (not exceeding two further months) within which a response will be provided. If the complaint is upheld, the CPO will arrange for any necessary steps to be taken as a consequence.

- 3.1.4 Individuals whose Personal Information is processed under the UK Controller Policy also have the right to: i) complain to the ICO; ii) and/or to bring proceedings in the courts of the United Kingdom, as described in Section C of the UK Controller Policy. These rights will apply whether

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or not they have first made a complaint to Verizon.

3.2 Complaints where a Group Member is a Processor

3.2.1 Where a complaint arises under the UK Processor Policy in respect of the Processing of Personal Information where a Group Member is the Processor in respect of that information, 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 Customer and Verizon if the Customer requires Verizon to deal with the complaint.

3.2.2 When a Customer ceases to exist

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 the UK Processor Policy, have the right to complain to Verizon and Verizon will deal with such complaints in accordance with this Complaint Handling Procedure. In such cases, individuals also have the right to complain to the ICO; and/or to bring proceedings in the courts of the United Kingdom as described in Section C of the UK Processor Policy and this will apply whether or not they have first made a complaint to Verizon.

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Appendix 6

UK Co-operation Procedure

1. INTRODUCTION

1.1 This UK Co-operation Procedure sets out the way in which Verizon will co-operate with the ICO in relation to the UK Binding Corporate Rules Controller Policy ("**UK Controller Policy**") and the UK Binding Corporate Rules Processor Policy ("**UK Processor Policy**") (together the "**Policies**") (together the "**Policies**").

2. CO-OPERATION PROCEDURE

2.1 Where required, Group Members will make the necessary personnel available for dialogue with the ICO in relation to the Policies.

2.2 Group Members will actively review and consider:

- (a) any decisions made by the ICO on any data protection law issues that may affect the Policies; and
- (b) the views of the ICO as outlined in its published UK guidance on Binding Corporate Rules for Controllers and Processors.

2.3 Upon request, Group Members will provide copies of the results of any audit of the Policies to the ICO who will upon receiving the audit results be reminded of its duty of professional secrecy under UK Data Protection Law.

2.4 In addition, all Group Members agree to be audited by the ICO in accordance with applicable audit procedures of the ICO, who will be reminded of its duty of professional secrecy under UK Data Protection Law

2.5 Group Members agree to abide by a formal advice of the ICO where a right to appeal is not exercised on any issues relating to the interpretation and application of the Policies.

2.6 Group Members will comply with any decisions and enforcement notices issued by the ICO.

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Appendix 7

UK Updating Procedure

1. INTRODUCTION

- 1.1 This UK Updating Procedure sets out the way in which Verizon will communicate changes to the UK Binding Corporate Rules Controller Policy ("**UK Controller Policy**") and to the UK Binding Corporate Rules Processor Policy ("**UK Processor Policy**") (together the "**Policies**") to the ICO, individuals, its Customers and to the Group Members.

2. MATERIAL CHANGES TO THE POLICIES

- 2.1 Verizon will communicate any material changes to the Policies such as those that potentially affect data protection compliance, are potentially detrimental to data subject rights, potentially affect the level of protection offered by the Policies or affect the binding nature of the Policies without undue delay to the ICO and all Group Members.
- 2.2 Where a change to the UK Processor Policy affects the conditions under which Verizon processes Personal Information on behalf of any Customer, Verizon will also communicate such information to any affected Customer before it is implemented, and with sufficient notice to enable affected Customers to object. Verizon's Customer may then suspend the transfer of Personal Information to Verizon and/or terminate the contract, in accordance with the terms of its contract with Verizon.

3. ADMINISTRATIVE CHANGES TO THE POLICIES

- 3.1 Verizon will communicate changes to the Policies which are administrative in nature (including changes in the list of Group Members) or which have occurred as a result of a change of UK Data Protection Law, through any legislative, court or measure introduced by the ICO to Group Members on a regular basis and to the ICO at least once a year. Verizon will also provide a brief explanation to the ICO of the reasons for any notified changes to the Policies.
- 3.2 Verizon will make available changes to the UK Processor Policy which are administrative in nature (including changes in the list of Group Members) or which have occurred as a result of a change of UK Data Protection Law, through any legislative, court or measure introduced by the ICO to any Customer on whose behalf Verizon processes Personal Information.

4. COMMUNICATING AND LOGGING CHANGES TO THE POLICIES

- 4.1 The Policies contain a change log which sets out the date of revisions to the Policies and the details of any revisions made. Verizon's Director, International Privacy will maintain an up to date list of the changes made to the Policies.
- 4.2 Verizon will communicate all changes to the Policies, whether administrative or material in nature via the Verizon website <https://www.verizon.com/about/privacy/binding-corporate-rules>:
- 4.2.1 to the Group Members bound by the Policies; and
- 4.2.2 systematically to Customers on whose behalf Verizon processes Personal Information, and to the individuals who benefit from the Policies, via the Verizon website <https://www.verizon.com/about/privacy/binding-corporate-rules>.
- 4.3 Verizon's Director, International Privacy will maintain an up to date list of the changes made to the Policies, the list of Group Members bound by the Policies and, in regard to the UK Processor Policy, a list of the sub-processors appointed by Verizon to process Personal Information on behalf of its Customers. The list of Group Members and any updates to the Policies will be available to and accessible by the individuals and the ICO (and to the Customer in the case of the UK Processor Policy) upon request.

5. NEW GROUP MEMBERS

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- 5.1 Verizon's Director, International Privacy will ensure that any Verizon group entity can be effectively bound by and deliver compliance with the Policies before they are admitted as a new Group Member.