

## **UK BCR CONTROLLER SUMMARY**

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

Verizon has entered into the UK BCR Addendum to the approved EU BCR-C. The UK BCR Addendum is a formal legal mechanism which extends the scope of the EU BCR-C to include transfers of personal data from the UK. Together, the EU BCR-C, the UK BCR-C Addendum and this UK BCR-C Summary form Verizon's UK BCR ("**UK BCR-C**"). Further information about the UK BCR addendum process is available on the UK Information Commissioner's Office ("**ICO**") website

https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/international-transfers/guide-t o-binding-corporate-rules/a-uk-bcr-addendum/

The purpose of this UK BCR summary is to provide information to individuals whose personal data is transferred under the UK BCR-C so that they know how their information is processed, what rights they have under the UK BCR-C and how to enforce them.

Contact details for queries about Verizon's UK BCR	Any questions regarding Verizon's UK BCR-C, your rights under the UK BCR-C or any other data protection issues can be directed to Verizon's Senior Director, International Privacy using the following details:	
	Email: <u>EMEAdataprotection@verizon.com</u>	
	• Telephone: + 44 (0)118 905 5000	
	<ul> <li>Address: Verizon Legal Department, Reading International Business Park, Basingstoke Road, Reading RG2 6DA</li> </ul>	
Description of data transfers covered by Verizon's UK BCR	A description of the data transfers covered by Verizon's BCRs (including the UK BCRs) can be found in the "Introduction to this Policy" and "Part I: Background and actions" of the EU BCR-C. In summary:	
	• The UK BCR-C is legally binding and apply to all Verizon group members that have entered into an intra-group agreement regarding UK Controller Binding Corporate Rules ("Group Members") and their employees where those Group Members process personal information. A list of the companies bound by the BCR-C, including contact details is available <u>here</u> .	
	<ul> <li>Personal information processed by Group Members for their own purposes [or as a processor on behalf of another Group Member] fall within scope of the UK BCR-C.</li> </ul>	
	<ul> <li>The UK BCR-C applies to all such personal information processed by Verizon: (i) in the course of customer and supplier management</li> </ul>	

r	(including and upons of Variable products and continue) and (")
	(including end-users of Verizon's products and services), and (ii) which relates to employees and contractors.
•	Personal information is collected from the following categories of data subjects under the UK BCR-C: customers, suppliers, employees and contractors and end-users.
•	Categories of personal information processed under the BCR include:
	<ul> <li>in relation to customers: customer contact names; addresses; contact telephone numbers; email addresses; bank account numbers; directors' details including names, professional addresses and dates of birth; IP addresses; call detail records (CRDs); audio and images in connection with recorded calls including video calls; data collected for customer support; username and passwords; level of responsiveness to marketing; CCTV images from Verizon premises;</li> </ul>
	<ul> <li>in relation to suppliers: company contact information including names, professional addresses and telephone numbers of company contacts; directors' information including names, professional addresses and dates of birth; audio and images in connection with recorded calls including video calls; CCTV images from Verizon premises;</li> </ul>
	<ul> <li>in relation to employees and contractors: name; address; date of birth; photograph; marital status; sexual orientation; next of kin; contact telephone number; email address; email and IP traffic; unique identifiers of company-issued devices; audio and images in connection with recorded calls including video calls; CCTV images from Verizon premises; educational history and qualifications; results of background checks; bank account details; race/ethnicity, national identity and/or social security number; driving licence details; passport details; health information and health records; salary and bonus details; information relating to performance and conduct; pension contributions; membership of benefits schemes including private health schemes; areas of expertise and disciplinary information; and</li> </ul>
	<ul> <li>in relation to end-users: name; contact information; date of birth; occupation/employment; marketing preferences; survey information and responses and images; IP addresses, phone numbers and call detail records (CDRs).</li> </ul>
•	Purposes for which personal information is transferred under the UK BCR-C include:
	<ul> <li>Transfers of customer personal information are made for billing; marketing; providing, evaluating and monitoring the</li> </ul>

		s and services; providing training and services; IT development and security.
		lier personal information are made for supplier management, including supply d record keeping.
	are made for open contact; compliand and other regulate to fraud and co workforce; the o contact directorie training; payroll	yee and contractor personal information rational purposes, including: emergency with mandatory reporting obligations ory requirements; investigations relating lisciplinary matters; management of peration of internal global employee s; administration; the management of and benefit administration; and erformance and talent management.
	the purposes of including: enabling	user personal information are made for customer and supplier management Group Members to provide services to benefit from the services provided to rs.
	<ul> <li>The UK BCR-C cover b processing.</li> </ul>	oth automated and manual types of
List of countries where personal data is transferred to under the UK BCR	The countries where personal data is transferred to under Verizon's UK BCR-C are listed in the " <u>Binding Corporate Rules Participant List</u> ". The countries are as follows:	
	Australia	Lithuania
		Liuluallia
	Austria	Luxembourg
	Austria	Luxembourg
	Austria Belgium	Luxembourg Malaysia
	Austria Belgium Bermuda	Luxembourg Malaysia Mexico
	Austria Belgium Bermuda Brazil	Luxembourg Malaysia Mexico Netherlands
	Austria Belgium Bermuda Brazil Bulgaria	Luxembourg Malaysia Mexico Netherlands New Zealand
	Austria Belgium Bermuda Brazil Bulgaria Canada	Luxembourg Malaysia Mexico Netherlands New Zealand Norway
	Austria Belgium Bermuda Brazil Bulgaria Canada Chile	Luxembourg Malaysia Mexico Netherlands New Zealand Norway Peru
	Austria Belgium Bermuda Brazil Bulgaria Canada Chile Czech Republic	Luxembourg Malaysia Mexico Netherlands New Zealand Norway Peru The Philippines
	Austria Belgium Bermuda Brazil Bulgaria Canada Chile Czech Republic Denmark	Luxembourg Malaysia Mexico Netherlands New Zealand Norway Peru The Philippines Poland
	Austria Belgium Bermuda Brazil Bulgaria Canada Chile Czech Republic Denmark Finland	Luxembourg Malaysia Mexico Netherlands New Zealand Norway Peru The Philippines Poland Portugal
	Austria Belgium Bermuda Brazil Bulgaria Canada Chile Czech Republic Denmark Finland France	Luxembourg Malaysia Mexico Netherlands New Zealand Norway Peru The Philippines Poland Portugal Romania
	Austria Belgium Bermuda Brazil Bulgaria Canada Canada Chile Czech Republic Denmark Finland France Germany Greece Hong Kong	Luxembourg Malaysia Mexico Netherlands New Zealand Norway Peru Peru The Philippines Poland Portugal Romania Singapore
	Austria Belgium Bermuda Brazil Bulgaria Canada Chile Czech Republic Denmark Finland France Germany Greece	Luxembourg Malaysia Mexico Netherlands New Zealand Norway Peru Peru The Philippines Poland Portugal Romania Singapore Slovakia

	India	Switzerland	
	Ireland	Taiwan	
	Italy	Thailand	
	Japan	United Kingdom	
	Korea	United States of America	
The rights of individuals whose personal data is transferred under the UK BCR, including third party beneficiary rights, and the means to exercise those rights	<ul> <li>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-C:</li> <li>Rule 5 : Honouring Individuals' Rights and Appendix 1: Individuals' Rights Procedure</li> <li>Section C: Third Party Beneficiary Rights</li> </ul>		
How to complain to Verizon BCR Members	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-C.		
	As indicated in Appendix 5 of the EU BCRs and specifically in a UK context, all complaints made under the UK BCR-C can be brought:		
	<ul> <li>in writing to Verizon's Senior Director, International Privacy at emeadataprotection@verizon.com, or</li> </ul>		
	<ul> <li>by writing to Senior Director, International Privacy, Verizon, Legal Department, Reading International Business Park, Basingstoke Road, Reading, RG2 6DA.</li> </ul>		
	Where a complaint arises under this UK BCR-C, Verizon's Senior Director, International Privacy will handle all complaints by liaising with relevant business units to investigate the complaint and coordinate a response.		
	Individuals also have the right to complain to:		
	the UK Information Commissioner; and/or		
	• the courts of the UK.		
	These rights will apply whether or poly verizon.	not they have first made a complaint to	
How to complain to the UK Information Commissioner's Office about Verizon's UK BCR	he UK Information commissioner's Office about the ICO – for more information please <u>https://ico.org.uk/for-the-public/how-to-make-a-data-protection-comp</u>		
	Wycliffe House Water Lane		
	Wilmslow		
	Cheshire		
	SK9 5AF		

	Telephone: 0303 123 1113 Textphone: 01625 545860 Monday to Friday, 9am to 4:30pm
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	<ul> <li>The individual court systems provide guidance on how to bring a claim in England and Wales, Scotland and Northern Ireland.</li> <li>Citizens Advice provides information on taking legal action in England and Wales, Scotland and Northern Ireland.</li> <li>Finally, you can find further information at: <ul> <li>www.justice.gov.uk (England and Wales)</li> <li>www.scotcourts.gov.uk (Scotland)</li> <li>www.courtsni.gov.uk (Northern Ireland)</li> </ul> </li> </ul>