ITEM [2.3.1] - 12/02 INFO NOTE - Information on BCRs for companies which have ICO as BCR Lead Supervisory Authority – Discussion and Adoption

Strategic Advisory Expert Subgroup

I. Background

Taken into account the recent developments regarding Brexit, the January plenary decided to give priority to Brexit questions. The ITS had already received a mandate to work on BCRs for companies which have ICO as BCR lead supervisory authority.

II. Current state of play

The ITS held a meeting on the 29 January 2019 and drafted a note relating to the impact of the Brexit for BCRs where the ICO is involved in case of a no deal scenario. This was added as an annex to the Information note on data transfers after Brexit prepared by the [ ]. Members discussed - during the Strategic Advisory expert SG (SAESG) held on the 31 January 2019 - the Information note, including the annex provided for by the ITS. The SAESG were in favor to make two separate documents in view of the plenary. They decided to raise this question at the plenary meeting (see INFO NOTE - Information note on GDPR data transfers – discussion and adoption).

III. Discussion points

The Strategic Advisory expert subgroup members discussed the content of the note and the [ ] proposal under option 2 of the note.
Request to the Plenary:

The question on the possible integration of this ITS note within the SEC information note relating to data transfers under the GDPR in the event of a no-deal Brexit is addressed in the info note relating to the SEC document.

Attachments: Note on BCRs for companies which have ICO as BCR Lead Supervisory Authority