

Pre-GDPR BCRs overview list

The list of pre-GDPR BCRs provides information on BCRs which were submitted to supervisory authorities (SAs) for approval prior to 25 May 2018 and for which the informal cooperation procedure was closed successfully. The list states which SA took charge of coordinating the informal EU cooperation procedure.

Inclusion in the list does not imply endorsement by the EDPB of these BCRs. Inclusion in the list is without prejudice to any decision or measure the competent SA wishes to take, in particular regarding the BCRs or the processing involved.

Please note that this overview list is provided for information purposes only. Companies have a responsibility to inform the competent supervisory authorities of changes to the BCRs. The overview list is updated based on information provided by the company to the competent supervisory authorities.

Companies relying on BCRs for data transfers are obliged to give concerned data subjects easy access to their BCRs. For more details about the BCRs, please contact the company.

| Title* | Type of BCR* | Closure of the EU cooperation | SA* | Terminated BCR | Updates | Last update of the overview* |
|--------------------------|--------------------------|-------------------------------|-----------------|----------------|--|------------------------------|
| ABN AMRO Group N.V. | Controller | 2012 | NL SA | N | | 20200703 |
| Accenture | Controller | 2009 | UK SA | | Lead SA change: IE SA as of March 2019 | 20200528 |
| ADIANT | Controller | | BE SA | N | | 20201021 |
| AGCO | Controller | | DE SA (Bavaria) | N | | 20201020 |
| Air liquid | Controller | 2018 | FR SA | | | 20201026 |
| Airbus | Controller | 2014 | FR SA | | | 20201026 |
| Akastor ASA | Controller | | NO SA | | | 20180524 |
| Aker Solutions ASA | Controller | | NO SA | | | 20180524 |
| Akzo Nobel N.V. | Controller | 2014 | NL SA | N | | 20200706 |
| Align Technologies, Inc. | Controller and Processor | 2014 | NL SA | N | | 20200706 |

* Mandatory fields

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|---------------------------------------|--------------------------|-----------------------------------|-----------------|----------------|---|------------------------------|
| Allianz | Controller | | DE SA (Bavaria) | N | | 20201020 |
| American Express Company | Controller | 2012 | UK SA | | BCR in effect as of 28 January 2013 Lead SA change: ES SA as of September 2019 | 20200528 |
| AMGEN | Controller | 2016 | FR SA | N | | 20201026 |
| Arcadis N.V. | Controller | 2017 | NL SA | N | | 20200706 |
| ArcelorMittal Group | Controller | 2013 | LU SA | N | | 20201030 |
| Ardian | Controller | 2013 | FR SA | N | Name change: group was called Axa Private Equity | 20201026 |
| Astra Zeneca AB | Controller | 2014 | UK SA | N | Lead change: SE SA as of October 2020 | 20201030 |
| Atos | Controller and Processor | 2014 | FR SA | | | 20201026 |
| Automated Data Processing Inc. (ADP) | Controller and Processor | 2018 Controller 2018 Processor | NL SA | N | | 20200703 |
| AVAYA Group | Controller and Processor | 2018 | DE SA (Hessen) | Y | | 20201029 |
| AXA | Controller | 2013 | FR SA | N | | 20201026 |
| BakerCorp International Holdings Inc. | Controller | 2015 | NL SA | | | 20200707 |
| BMC Software | Controller and Processor | 2015 | FR SA | | | 20201026 |
| BMW | Controller | | DE SA (Bavaria) | N | | 20201020 |
| BNP Paribas SA | Controller | 2018 | FR SA | | | 20201026 |

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|--------------------------------------|--------------------------|-------------------------------|----------------------|----------------|---|------------------------------|
| Box, Inc | Controller and Processor | 2016 | UK SA | | | 20200528 |
| BP | Controller | 2010 | UK SA | | | 20200528 |
| Bristol Myers Squibb | Controller | 2011 | FR SA | N | Lead Authority change: IE SA as of June 2019 on date 20190625 | 20201026 |
| BT Group Plc. | Controller and Processor | 2017 | UK SA | | Lead Authority change: NL SA as of September 2020 | 20200901 |
| CA Plc. (trading as CA Technologies) | Controller | 2015 | UK SA | | Lead SA change: DE (Hessen) as of 28/08/2018 | 20200528 |
| Capgemini | Controller and Processor | 2016 | FR SA | | | 20201026 |
| Cardinal Health, Inc | Controller | | MT SA | | | 20180524 |
| CareFusion Inc. | Controller | 2011 | UK SA | Y | BCRs withdrawn 2019 at request of applicant | 20200528 |
| Cargill, Inc. | Controller | 2013 | UK SA | | Lead change: NL SA as of July 2020 | 20200528 |
| Christian Louboutin SAS | Controller | 2018 | FR SA | | | 20201026 |
| Cisco Systems, Inc. | Controller | 2018 | NL SA | N | | 20200706 |
| Citigroup | Controller | 2012 | UK SA | N | BCR in effect as of 6 June 2013 Lead change: IE SA as of December 2020 | 20201020 |
| CMA-CGM | Controller | 2011 | FR SA | N | | 20201026 |
| Continental Group | Controller | | DE SA (Lower Saxony) | N | | 20201021 |
| Corning | Controller | 2015 | FR SA | | | 20201026 |
| Coöperatieve Rabobank U.A. | Controller | 2014 | NL SA | N | | 20200706 |
| Danfoss A/S | Controller | | DK SA | | | 20201020 |

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| Deutsche Post DHL | Controller | 2011 | DE SA (BFDI) | N | | 20201030 |
| Deutsche Telekom | Controller | 2014 | DE SA (BFDI) | N | | 20201030 |
| DNV GL | Controller | | NO SA | | | 20180524 |
| DocuSign | Controller and Processor | 2018 | IE SA | N | | 20201020 |
| DSM | Controller | | NL SA | | | 200117 |
| e-Bay | Controller | 2009 | LU SA | N | | 20201030 |
| ENGIE | Controller | 2015 | FR SA | | Name change: group was called GDF SUEZ | 20201026 |
| EY | Controller and Processor | 2013 Controller 2018 Processor | UK SA | N | Lead change: NL SA as of May 2019 Name change: group was called Ernst & Young | 20200706 |
| Festo Group | Controller | 2017 | DE SA (Baden-Württemberg) | N | | 20201118 |
| First Data Corporation | Controller and Processor | 2011 | UK SA | | Lead change: IE SA as of December 2020 | 20200528 |
| Flex | Controller | 2015 | UK SA | | Name change: group was called Flextronics International Ltd | 20200528 |
| Fluor Corporation INC. | Controller | 2015 | UK SA | N | Lead change: NL SA as of April 2020 | 20200703 |
| General Electric (GE) | Controller and Processor | 2012 Controller 2018 Processor | FR SA | | | 20201026 |
| Giesecke & Devrient | Controller and Processor | | DE SA (Bavaria) | N | | 20201020 |
| GlaxoSmithKline Plc | Controller | 2013 | UK SA | | Lead change: IE SA as of October 2020 | 20200528 |

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|----------------------------|--------------------------|--------------------------------------|------------|-----------------------|---|-------------------------------------|
| Henner | Controller | 2017 | FR SA | Y | Company notified Lead SA of termination in March 2020 | |
| Hermès | Controller | 2012 | FR SA | N | | 20201026 |
| Hewlett Packard Company | Controller | 2011 | FR SA | Y | Corporate reorganisation: Hewlett Packard Company was split into 2 companies in 2015: HP Inc. and HP Enterprise | 20201026 |
| Hewlett Packard Enterprise | Controller and Processor | 2011 Controller 2017 Processor | FR SA | | Corporate reorganisation: Hewlett Packard Company was split into 2 companies in 2015: HP Inc. and HP Enterprise | 20201026 |
| Hewlett Packard Inc. | Controller and Processor | 2011 Controller 2018 Processor | FR SA | | Corporate reorganisation: Hewlett Packard Company was split into 2 companies in 2015: HP Inc. and HP Enterprise | 20201026 |
| Hyatt | Controller | 2009 | UK SA | | | 20200528 |
| IMS Health Incorporated | Controller | 2010 | UK SA | Y | BCRs withdrawn 2019 at request of applicant | 20200528 |
| ING Bank N.V. | Controller | 2013 | NL SA | N | | 20200706 |
| Intel Corporation | Controller | 2012 | IE SA | N | | 20201020 |

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| International Business Machines Corporation (IBM) | Controller | 2017 | UK SA | | Lead change: NL SA as of September 2020 | 20200528 |
| International SOS | Controller | 2011 | FR SA | N | | 20201026 |
| ISS Group | Controller | | DK SA | | | 20201020 |
| Itera ASA | Processor | | NO SA | | | 20180524 |
| Jacobs Douwe Egberts N.V. | Controller | 2011 | NL SA | N | Name change: group was called D.E. Master Blenders 1753 ("DEMB") until 23 June 2015 Name change: group was called Sara Lee International B.V. (indirect subsidiary of Sara Lee Corporation) until 4 July 2011 | 20200706 |
| John Deere | Controller | 2018 | DE SA (Baden-Württemberg) | N | | 20201118 |
| Johnson Controls | Controller | | BE SA | N | | 20201021 |
| JPMC | Controller | 2010 | UK SA | | Lead change: DE (Hessen) as of December 2020 | 20200528 |
| Kongsberg | Controller | | NO SA | | | 20180524 |
| Koninklijke DSM N.V. | Controller | | NL SA | | | 20200706 |
| Koninklijke Vopak N.V. | Controller | 2017 | NL SA | N | | 20200706 |
| Kvaerner ASA | Controller | | NO SA | | | 20180524 |
| Latham & Watkins LLP | Controller | 2016 | UK SA | | Lead change: DE (Hessen) as of December 2020 | 20200528 |

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| LeasePlan Corporation N.V. | Controller | 2015 | NL SA | N | | 20200706 |
| Ledvance | Controller | | DE SA (Bavaria) | N | | 20201020 |
| Lego Group | Controller | | DK SA | | | 20201020 |
| Legrand | Controller | 2014 | FR SA | | | 20201026 |
| Linkbynet | Controller and Processor | 2014 | FR SA | | | 20201026 |
| Linklaters LLP | Controller | 2012 | UK SA | | Lead SA change: BE SA as of 1 February 2020 | 20200528 |
| Louis Vuitton Moët Hennessy (LVMH) | Controller | 2010 | FR SA | N | | 20201026 |
| Maersk Group | Controller | | DK SA | | | 20201020 |
| Marsh and McLennan Companies Inc. | Controller and Processor | 2017 | UK SA | | Lead change: IE SA as of September 2020 | 20200528 |
| Mastercard | Controller and Processor | | BE SA | N | | 20201021 |
| Merck Sharp & Dohme (MSD) | Controller | | BE SA | | | 20180524 |
| Michelin | Controller | 2010 | FR SA | N | | 20201026 |
| Microchip Technology Inc. | Controller | 2009 | UK SA | | Name change: group was called the Atmel Corporation Lead SA change: NO SA as of October 2018 | 20200528 |
| Motorola Mobility LLC | Controller | 2013 | UK SA | | | 20200528 |
| Motorola Solutions | Controller | | UK SA | N | Lead Authority change: DK SA as of December 2020 | 20201020 |
| NetApp, Inc. | Controller | 2015 | NL SA | N | | 20200706 |
| NextiraOne Europe B.V. | Processor | 2016 | NL SA | N | | 20200706 |

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| Norsk Hydro | Controller | | NO SA | | | 20180524 |
| NOVARTIS | Controller | 2012 | FR SA | N | | 20201026 |
| Novo Nordisk A/S | Controller | | DK SA | | | 20201020 |
| Nutreco N.V. | Controller | 2016 | NL SA | N | | 20200706 |
| Oracle EMEA Ltd | Processor | 2017 | IE SA | N | | 20201020 |
| Osram | Controller | | DE SA (Bavaria) | N | | 20201020 |
| OVH | Controller | 2012 | FR SA | N | | 20201026 |
| PayPal | Controller | 2018 | LU SA | N | | 20201030 |
| Rakuten | Controller | 2017 | LU SA | N | | 20201030 |
| Rockwool | Controller | | DK SA | | | 20201020 |
| Royal Dutch Shell Plc. | Controller | 2012 | NL SA | N | | 20200706 |
| Royal Philips Electronics | Controller and Processor | 2012 Controller 2014 Processor | NL SA | N | | 20200706 |
| Safran | Controller | 2010 | FR SA | N | | 20201026 |
| Salesforce | Processor | 2015 | FR SA | N | | 20201026 |
| Sanofi Aventis | Controller | 2009 | FR SA | N | | 20201026 |
| Schlumberger Ltd. | Controller | 2012 | NL SA | N | | 20200706 |
| Schneider Electric | Controller | 2012 | FR SA | N | | 20201026 |
| Siemens Group | Controller | | DE SA (Bavaria) | N | | 20201020 |
| Simon-Kucher & Partners | Controller | | DE SA (North Rhine-Westphalia) | | | 20180524 |
| Société Générale | Controller | 2013 | FR SA | N | | 20201026 |
| Sopra HR Software | Controller and Processor | 2012 Controller 2013 Processor | FR SA | N | Name change: group was called HR Access | 20201026 |
| Spencer Stuart | Controller | 2011 | UK SA | | | 20200528 |
| Starwood Hotels and Resorts | Controller | | BE SA | Y | As of 15 October 2018 the Starwood BCRs are terminated | 20180524 |
| Statoil ASA | Controller | | NO SA | | | 20180524 |
| Telefonaktiebolaget LM Ericsson | Controller and Processor | 2016 Processor | SE SA | N | | 20201030 |

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| | | 2017 Controller | | | | |
| Teleperformance ² | Controller and Processor | 2018 | FR SA | N | | 20201026 |
| TMF Group B.V. | Controller and Processor | 2014 | NL SA | N | | 20200706 |
| TNT Express N.V. | Controller | 2017 | NL SA | N | Due to an acquisition of TNT by FedEx, the geographical scope of the BCR has been extended. The name of the group entity in the NL is "TNT Nederland B.V." and with the acquisition "Federal Express Corp. In the U.S. joined. | 20200706 |
| Total | Controller | 2014 | FR SA | N | | 20201026 |
| Twilio Ireland Ltd | Controller and Processor | 2018 | IE SA | N | | 20201020 |
| UCB | Controller | | BE SA | N | | 20201021 |
| United Technologies Corporation (UTC) | Controller | | BE SA | N | | 20201021 |
| Univar, Inc. | Controller | 2017 | NL SA | N | | 20200706 |
| Verizon communications inc. | Controller and Processor | 2018 | UK SA | | Lead change: IE SA as of December 2020 | 20200528 |
| VMware International Limited | Processor | 2018 | IE SA | N | | 20201020 |
| Workday | Processor | 2018 | IE SA | N | | 20201020 |
| Yara | Controller | | NO SA | | | 20180524 |

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| Zendesk International Limited | Controller and Processor | 2017 | IE SA | N | | 20201020 |

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