

## **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 responsability 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
ADIENT	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

<sup>\*</sup> Mandatory fields

Title*	Type of BCR*	Closure of the EU cooperation	SA*	Terminated BCR	Updates	Last update of the overview*
Align Technologies, Inc.	Controller and Processor	2014	NL SA	N		20200706
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		Lead change: SE SA as of October 2020	
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)	N	Correction: BCR was mistakenly listed as terminated	20230303
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
ВР	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	Υ	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
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

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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	7(11.7	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 GmbH	Controller and Processor		DE SA (Bavaria)	N	Name change: group was called Giesecke&Devrient	20230317
GlaxoSmithKline Plc	Controller	2013	UK SA		Lead change: IE SA as of October 2020	
Henner	Controller	2017	FR SA	Υ	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	20201026

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					into 2 companies in 2015: HP Inc. and HP Enterprise	
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	Υ	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
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 subsidiairy of Sara	20200706

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					Lee Corporation) until 4 July 2011	
John Deere	Controller	2018	DE SA (Baden- Württemberg)	1/1		20201118
Johnson Controls	Controller		BE SA	Ν		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
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

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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
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

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Simon-Kucher & Partners	Controller		DE SA (North Rhine- Westphalia)			20180524
Sociéte 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
Starwoord Hotels and Resorts	Controller		BE SA	Υ	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 2017 Controller	SE SA	N		20201030
Teleperformance <sup>2</sup>	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 aquisition "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

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United Technologies Corporation (UTC)	Controller		BE SA	N		20201021
Univar Solutions	Controller	2017	NL SA	N	Name change: group was listed under 'Univar, Inc.'	20210114
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
Zendesk International Limited	Controller and Processor	2017	IE SA	N		20201020

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