Guernsey Addendum to the EU BCR-C

The Northern Trust BCRs create a binding corporate rules (BCR) framework which has been approved by the lead European Supervisory Authority as providing an adequate level of protection for Personal Data transferred to members of the Northern Trust Group outside the EEA and located in a Third Country. According to section 56 (2) (b) of the Data Protection (Bailiwick of Guernsey) Law, 2017, this approval by the lead European Supervisory Authority also constitutes a guarantee of adequate data protection for transfers of Personal Data from Guernsey to countries without an adequate level of data protection according to Guernsey data protection legislation.

In view of and within the scope of applicability of Guernsey data protection laws, the BCRs are supplemented as follows:

i. References to the "Applicable Law" include, in particular, references to the Data Protection (Bailiwick of Guernsey) Law, 2017 ("GDPL") and all other local laws, ordinances and regulations governing data protection and privacy.

ii. References to the "Competent Supervisory Authority" and "Supervisory Authority" are to be understood as including references to the Authority and the Commissioner under the GDPL.

iii. References to the "EEA Data Privacy Laws" include references to the GDPL and/or Applicable Law.

iv. References to the "EEA" and "EEA member states" are to be understood as including the islands constituting the Bailiwick of Guernsey.

v. References to the "GDPR" are to be understood as references to the GDPL including a reference to Applicable Law. In case of references to specific provisions in the GDPR, the references should be understood as references to the corresponding provision in the GDPL and/or Applicable Law.

vi. References to the "Privacy and Electronic Communications Law" are to be understood to include the European Communities (Implementation of Privacy Directive (Guernsey) Ordinance 2004 ("Privacy Ordinance"), to the extent that the Privacy Ordinance is applicable and relevant in the specific context.

vii. References to the "Substantial Public Interest" are to be understood to include Guernsey law.

viii. References to "Third Country" are to be understood to include any country that does not have an adequate level of data protection according to the GDPL.

ix. References to the "European Union" or "EU Member State" are to be understood to include the islands constituting the Bailiwick of Guernsey (whether individually or collectively, as appropriate).

x. The Reference to the EC-approved Standard Contractual Clauses are to be understood to include the necessary adjustments to those clauses according to the GDPL and/or Applicable Law, which include the Bailiwick of Guernsey Addendum for the EU Commission's Standard Contractual Clauses.

xi. The postal address in section 8.3 in Guernsey is: PO Box 71, Trafalgar Court, Les Banques, St Peter Port, Guernsey, GY1 3DA.