

## **Brexit – Statement of Assurance**

### **From the Managing Directors Office; 22/12/2020**

The UK left the EU (“**Brexit**”) on January 31, 2020. The UK is in a transition period until the end of December 2020. The business of PrimarySite Limited is to offer school website and communication services and our platform relies on both UK and EU data centres. During 2018 we invested in moving our personal data storage from the EU to the UK where it is now hosted in Google’s London data centre. However we continue to use the AWS platform in Ireland for the storage of assets published on our websites, as well as for encoding videos and the relaying of emails.

We don’t expect Brexit to have any impact on our customers’ use of our services or cause any interruption to our supply of services or to the supply of the underlying Google or AWS services . During and after the transition period, customers will be able to transfer data into and out of AWS Regions throughout the European Economic Area (“**EEA**”) and the UK, just as they did before Brexit.

Here’s how:

**Transfers between the EEA and the UK during the transition period.** During the transition period, EU laws will continue to apply (including the GDPR). Transfers of personal data between the EEA and the UK during the transition period will not be considered to be transfers to a third country under the GDPR and will not require any additional safeguards.

**Transfers from the EEA to the UK after the transition period.** If no special arrangements for transfer are agreed between the UK and the EU, then customers wishing to transfer personal data from the EEA to the UK (including to the AWS London Region) can rely on the Standard Contractual Clauses for the transfer. The Standard Contractual Clauses are a part of every AWS services agreement and are contained in the [AWS Data Processing Addendum](#)

You can read the European Data Protection Board’s note regarding the use of Standard Contractual Clauses in connection with Brexit [Here](#)

**Transfers from the UK to the EEA (and other countries) after the transition period.** The UK government intends to grant “adequacy” to all EEA countries for the purposes of personal data flows so that additional safeguards will not be necessary. This would be relevant to customers wishing to transfer personal data from the UK to the EEA (including to the AWS Frankfurt, Ireland, Paris and Stockholm Regions). The UK government also intends to recognise existing EU adequacy decisions and the European Commission-approved Standard Contractual Clauses (which are the same as those in the AWS Data Processing Addendum) as a basis for international data transfers after the transition period.

You can read the UK ICO’s guidance on international data flows [here](#).

We will continue to provide you with updates on the subject. In the interim if to have any concerns or require further information on this statement in the first instance please contact PrimarySites Data Protection Officer [dpo@primarysite.net](mailto:dpo@primarysite.net).