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Aligned with standards and regulations

Standard / Regulation	Clause / Control / Article	Applicability	Coverage Type	Comment
ISO/IEC 27701:2025	Clause 7.5; Clause 8.1	Both	Primary	Transfer evidence and operational control
ISO/IEC 27701:2025	Clause 9.1; Clause 10.2	Both	Supporting	Monitoring, nonconformity and corrective action
ISO/IEC 27701:2025	Annex A.1.2.8; Annex A.1.2.9	Controller / Joint Controller	Supporting	Joint responsibility and processing records
ISO/IEC 27701:2025	Annex A.1.5.2; Annex A.1.5.3	Controller	Primary	Transfer basis and transfer locations
ISO/IEC 27701:2025	Annex A.1.5.4; Annex A.1.5.5	Controller	Primary	Transfer and disclosure records
ISO/IEC 27701:2025	Annex A.2.2.2; Annex A.2.2.3; Annex A.2.2.7	Processor	Supporting	Customer agreement, instructions and processor records
ISO/IEC 27701:2025	Annex A.2.5.2; Annex A.2.5.3	Processor	Primary	Processor transfer basis and locations
ISO/IEC 27701:2025	Annex A.2.5.4; Annex A.2.5.5; Annex A.2.5.6	Processor	Supporting	Processor disclosure records and legally binding disclosures
GDPR	Article 5(2); Article 24	Controller	Supporting	Accountability and controller measures
GDPR	Article 26	Joint Controller	Supporting	Joint responsibility allocation
GDPR	Article 28	Processor	Supporting	Processor instructions and authorization
GDPR	Article 30	Both	Supporting	Transfer records
GDPR	Article 44	Both	Primary	General transfer principle
GDPR	Article 45	Controller	Primary	Adequacy mechanism
GDPR	Article 46	Controller	Primary	Appropriate safeguards
GDPR	Article 47	Controller	Supporting	Binding corporate rules

GDPR	Article 48	Both	Supporting	Public authority disclosure requests
GDPR	Article 49	Controller	Supporting	Derogations for specific situations
ISO/IEC 29100:2020	Clause 5.6; Clause 5.10; Clause 5.12	Both	Supporting	Disclosure limitation, accountability and privacy compliance
ISO/IEC 29151:2022	Annex A.7	Both	Supporting	Use, retention, disclosure and transfer protection

1. Scope

- 1.1 This policy establishes the organization's requirements for identifying, approving, recording, reviewing, restricting and suspending international transfers of PII.
- 1.2 This policy applies to controller, joint controller, processor and subprocessor activities where PII is made available to, accessed from, stored in, hosted in, disclosed to, or otherwise transferred to a country, territory, international organization or recipient outside the approved processing boundary recorded in REG02 or REG09.
- 1.3 This policy applies to transfers involving internal affiliates, external recipients, processors, subprocessors, service providers, support access, hosting locations, remote administration, onward transfers, public authority disclosure requests and transfer-related service changes.
- 1.4 This policy does not provide legal advice, define standard contractual clause text, create a separate transfer impact assessment register, create a separate SCC register, define security-control architecture, define processor lifecycle governance, or define incident response workflow. Those matters are handled through related policies, customer-specific legal configuration or approved REG09 evidence.
- 1.5 For this policy, a material transfer change means any change to transfer destination, recipient, processing role, hosting location, support access location, transfer mechanism, onward transfer path, processor or subprocessor arrangement, legal or regulatory transfer condition, transfer safeguard, or residual transfer risk.

2. Purpose

- 2.1 The purpose of this policy is to ensure that international PII transfers are identified before they occur, supported by approved transfer mechanism evidence, reviewed for transfer risk, governed for onward transfers, and suspended or remediated when required evidence or safeguards are not maintained.
- 2.2 This policy enables the organization to demonstrate accountable transfer governance using REG09 as the primary transfer evidence object and REG02, REG08 and REG12 as supporting evidence objects.

3. Objectives

3.1 The objectives of this policy are to:

- 3.1.1 identify international PII transfers before processing begins or changes;
- 3.1.2 maintain approved transfer records in REG09;
- 3.1.3 document transfer mechanisms and supporting evidence;
- 3.1.4 define transfer risk review and approval requirements;
- 3.1.5 control processor, subprocessor and onward transfer authorization;
- 3.1.6 review active transfers on a defined cadence;
- 3.1.7 suspend or remediate transfers when required evidence, authorization or safeguards are not maintained;
- 3.1.8 avoid unnecessary legal-advice text, duplicate registers and duplicate supplier-governance controls.

4. Policy Statements

4.1 Transfer identification and registration

- 4.1.1 [Controller] The Process Owner / Business Owner MUST identify international PII transfer destinations, recipient categories and access locations in REG02 before the processing activity begins or materially changes.

- 4.1.2 [Controller] The Privacy Lead / PIMS Manager MUST create or update the REG09 transfer record before any new or materially changed controller international PII transfer begins.
- 4.1.3 [Processor] The Vendor / Procurement Owner MUST record customer-authorized processor transfer destinations, service locations and remote access locations in REG08 and REG09 before processor transfer activity begins or changes.
- 4.1.4 [Joint Controller] The Privacy Lead / PIMS Manager MUST record joint-controller responsibility allocation for international transfer decisions in REG08 and REG09 before joint transfer activity begins or changes.
- 4.1.5 [Both] The Process Owner / Business Owner MUST identify onward transfer routes, onward recipient categories and onward transfer conditions in REG09 before the onward transfer is approved.

4.2 Transfer mechanism selection and approval

- 4.2.1 [Controller] The Privacy Lead / PIMS Manager MUST record the approved transfer mechanism and supporting evidence in REG09 before a controller international PII transfer begins.
- 4.2.2 [Controller] The Data Protection Officer / Privacy Advisor MUST review transfer mechanism evidence in REG09 before approval of a new, materially changed or higher-risk international PII transfer.
- 4.2.3 [Processor] The Vendor / Procurement Owner MUST obtain documented customer authorization or instruction in REG08 and REG09 before initiating any processor international PII transfer.
- 4.2.4 [Subprocessor] The Vendor / Procurement Owner MUST record subprocessor transfer authorization and applicable flow-down transfer conditions in REG08 and REG09 before subprocessor transfer activity begins.
- 4.2.5 [Both] The Privacy Lead / PIMS Manager MUST block or defer an international PII transfer in REG09 when the transfer mechanism, destination, recipient, role allocation or supporting evidence is incomplete before planned transfer start.

[... Sections 4.3–8 are not included in this preview. Purchase the full document to access the complete policy content. ...]

9. Exceptions

- 9.1.1 [All] The Process Owner / Business Owner MUST submit any request to proceed with incomplete, delayed or exceptional transfer evidence in REG12 before the exception becomes active.
- 9.1.2 [All] The Privacy Lead / PIMS Manager MUST approve or reject transfer exception requests in REG12 before the exception becomes active.
- 9.1.3 [All] The Data Protection Officer / Privacy Advisor MUST record advice in REG12 before approval of any transfer exception involving higher-risk processing, missing transfer mechanism evidence, public authority disclosure, onward transfer or certification impact.
- 9.1.4 [All] Top Management MUST approve transfer exceptions exceeding 90 days, affecting higher-risk processing, affecting repeated transfer activity or affecting external assurance in REG12 before the exception becomes active.
- 9.1.5 [All] The Privacy Lead / PIMS Manager MUST assign an owner, expiry date, compensating control and review frequency in REG12 for every approved transfer exception.
- 9.1.6 [All] The Privacy Lead / PIMS Manager MUST review each open transfer exception in REG12 at least monthly until closure.

10. Enforcement

- 10.1.1 [All] The Privacy Lead / PIMS Manager MUST record a nonconformity in REG12 within five business days of identifying an unrecorded transfer, unsupported transfer mechanism, missing processor authorization, overdue review, missing onward transfer evidence or unauthorized transfer continuation.
- 10.1.2 [Controller] The Privacy Lead / PIMS Manager MUST suspend a controller international PII transfer in REG09 when required transfer mechanism evidence is absent before the planned transfer start.
- 10.1.3 [Processor] The Vendor / Procurement Owner MUST suspend processor international transfer activity in REG08 and REG09 when required customer authorization is missing before transfer activity begins.
- 10.1.4 [Subprocessor] The Vendor / Procurement Owner MUST escalate unauthorized subprocessor international transfer activity in REG08 and REG12 within five business days of identification.
- 10.1.5 [All] Top Management MUST assign corrective action ownership in REG12 within 10 business days for repeated, prolonged, high-risk or certification-relevant transfer failures.
- 10.1.6 [All] The Internal Audit / Compliance Reviewer MUST verify corrective action effectiveness for transfer-related nonconformities in REG12 at the next scheduled audit or within 60 days of closure, whichever occurs first.

11. Review and Maintenance

- 11.1.1 [All] The Privacy Lead / PIMS Manager MUST review this policy annually and record the review outcome in REG12.
- 11.1.2 [All] The Privacy Lead / PIMS Manager MUST review this policy within 30 days of material change to transfer law, transfer mechanism availability, processor service model, hosting location, support access location, subprocessor arrangement, transfer safeguard, or PIMS certification requirements.
- 11.1.3 [All] The Data Protection Officer / Privacy Advisor MUST review privacy-significant changes to this policy in REG12 before approval.
- 11.1.4 [All] Top Management MUST approve material changes to this policy in REG12 before publication.
- 11.1.5 [All] The Privacy Lead / PIMS Manager MUST record communication of approved policy changes in REG11 within 30 days of publication.

12. Related Policies

- 12.1 This policy is supported by the following related policies:
- 12.2 PII01 - Privacy Information Management System Policy
- 12.3 PII02 - Privacy Roles, Responsibilities and Accountability Policy
- 12.4 PII03 - PII Processing Inventory and Lawful Basis Policy
- 12.5 PII04 - Privacy Notice and Transparency Policy
- 12.6 PII07 - Privacy Risk Assessment and DPIA Policy
- 12.7 PII08 - Privacy by Design and Default Policy
- 12.8 PII09 - PII Collection, Use, Disclosure and Sharing Policy
- 12.9 PII12 - Processor, Subprocessor and Third-Party Privacy Management Policy
- 12.10 PII14 - PII Security and Access Control Policy
- 12.11 PII17 - PIMS Documented Information and Evidence Management Policy
- 12.12 PII18 - PIMS Monitoring, Audit and Improvement Policy

13. Reference Standards and Frameworks

13.1 This policy is mapped to the following standards and regulations. The mapping explains how the policy supports the cited requirements and identifies the internal clauses that implement or support them.

13.2 ISO/IEC 27701:2025

13.2.1 **Clause 7.5; Clause 8.1** - Mapped to documented transfer evidence, transfer operational control, REG09 transfer fields, transfer approvals, transfer implementation records and transfer evidence reconciliation. Addressed by clauses [4.1.1; 4.1.2; 4.1.3; 4.2.1; 4.2.5; 7.1.1; 7.1.2; 7.1.3; 7.1.5; 7.1.6].

13.2.2 **Clause 9.1; Clause 10.2** - Mapped to monitoring, metrics, review, suspension, nonconformity and corrective action for international transfer controls. Addressed by clauses [4.3.4; 4.5.1; 4.5.3; 6.1.1; 6.1.2; 8.1.1; 8.1.2; 8.1.3; 8.1.4; 8.1.6; 10.1.1; 10.1.5; 10.1.6].

13.2.3 **Annex A.1.2.8; Annex A.1.2.9** - Mapped to joint-controller responsibility evidence and controller processing records containing international transfer information. Addressed by clauses [4.1.1; 4.1.4; 4.1.5; 4.5.5; 6.1.4; 7.1.5].

13.2.4 **Annex A.1.5.2; Annex A.1.5.3** - Mapped to controller transfer basis, transfer mechanism evidence, countries, international organizations, destinations and transfer review evidence in REG09. Addressed by clauses [4.1.2; 4.2.1; 4.2.2; 4.3.1; 4.5.1].

13.2.5 **Annex A.1.5.4; Annex A.1.5.5** - Mapped to transfer and disclosure records, onward transfer route identification and completed transfer or disclosure evidence. Addressed by clauses [4.1.5; 4.4.3; 4.4.5; 7.1.7].

13.2.6 **Annex A.2.2.2; Annex A.2.2.3; Annex A.2.2.7** - Mapped to processor customer agreements, documented customer instructions, processor records and authorization evidence for processor international transfers. Addressed by clauses [4.1.3; 4.2.3; 4.2.4; 4.4.2; 6.1.5; 7.1.6; 10.1.3].

13.2.7 **Annex A.2.5.2; Annex A.2.5.3** - Mapped to processor transfer basis, customer-authorized transfer destinations, service locations and transfer-location evidence. Addressed by clauses [4.1.3; 4.2.3; 4.2.4; 4.5.2; 7.1.6].

13.2.8 **Annex A.2.5.4; Annex A.2.5.5; Annex A.2.5.6** - Mapped to processor disclosure records, disclosure request handling evidence, public authority disclosure request routing and onward transfer evidence. Addressed by clauses [4.4.1; 4.4.2; 4.4.3; 4.4.4; 4.4.5; 10.1.4].

13.3 GDPR

13.3.1 **Article 5(2); Article 24** - Mapped to accountability, controller governance, transfer evidence, transfer risk review, exception handling and corrective action. Addressed by clauses [4.1.2; 4.2.1; 4.3.1; 4.3.4; 4.3.5; 6.1.2; 8.1.1; 9.1.2; 9.1.3; 10.1.1; 11.1.1].

13.3.2 **Article 26** - Mapped to joint-controller international transfer responsibility allocation. Addressed by clauses [4.1.4; 6.1.4].

13.3.3 **Article 28** - Mapped to processor and subprocessor transfer authorization, customer instructions, flow-down evidence and suspension where authorization is missing. Addressed by clauses [4.1.3; 4.2.3; 4.2.4; 4.4.2; 4.5.2; 6.1.5; 10.1.3; 10.1.4].

13.3.4 **Article 30** - Mapped to processing activity records and transfer records in REG02, REG08 and REG09. Addressed by clauses [4.1.1; 4.1.2; 4.1.3; 4.4.5; 4.5.5; 7.1.5].

13.3.5 **Article 44** - Mapped to general transfer governance, transfer mechanism approval, transfer risk review, missing-evidence suspension and transfer reassessment. Addressed by clauses [4.1.2; 4.2.1; 4.2.5; 4.3.1; 4.5.3; 4.5.4].

13.3.6 **Article 45** - Mapped to adequacy-based transfer mechanism evidence, review and approval in REG09. Addressed by clauses [4.2.1; 4.2.2; 4.5.1].

13.3.7 **Article 46** - Mapped to appropriate safeguards, safeguard evidence, technical safeguard dependency routing and transfer suspension where safeguards are missing or invalid. Addressed by clauses [4.2.1; 4.2.2; 4.3.2; 4.3.3; 4.5.3; 4.5.4].

13.3.8 **Article 47** - Mapped to binding corporate rules as a transfer mechanism option where applicable and recorded in REG09. Addressed by clauses [4.2.1; 4.2.2; 4.3.1].

13.3.9 **Article 48** - Mapped to foreign public authority disclosure request recording and privacy advice before response where practicable. Addressed by clauses [4.4.3; 4.4.4].

13.3.10 **Article 49** - Mapped to exceptional transfer mechanism evidence and exception approval where specific-situation derogations are used. Addressed by clauses [4.2.1; 4.2.2; 9.1.3].

13.4 ISO/IEC 29100:2020

13.4.1 **Clause 5.6; Clause 5.10; Clause 5.12** - Mapped to disclosure limitation, accountable transfer governance, transfer compliance evidence, review and corrective action. Addressed by clauses [4.1.2; 4.1.5; 4.3.5; 4.4.1; 4.5.1; 6.1.1; 8.1.1; 10.1.1].

13.5 ISO/IEC 29151:2022

13.5.1 **Annex A.7** - Mapped to transfer protection, disclosure limitation, transfer safeguard evidence, onward transfer control and suspension where transfer safeguards are missing or invalid. Addressed by clauses [4.2.1; 4.3.2; 4.3.3; 4.4.1; 4.5.3; 7.1.4].