



## Appendix 5 – Binding Corporate Rules (“BCR”)

Updating Procedure



- 1 This Updating Procedure sets out the way in which ISS will communicate changes to the BCR to the EEA data protection authorities, data subjects and to the ISS Entities bound by the BCR.
- 2 ISS' Group DPM will keep track of and record any updates to the BCR and provide the necessary information to the data subjects or EEA data protection authorities upon request.
- 3 ISS will without undue delay communicate any material changes to the BCR or to the list of ISS Entities bound by the BCR to the Danish Data Protection Agency (in Danish: "Datatilsynet") and any other relevant EEA data protection authority. ISS will also provide a brief explanation of the reasons for any notified changes to the BCR. ISS will once a year provide Datatilsynet with an overview of changes made, which are not considered to be substantial.
- 4 ISS will communicate any changes to the BCR to the ISS Entities bound by the BCR without undue delay and to relevant data subjects who benefit from the BCR. The BCR contains a change log which sets out the date the BCR is revised and the details of any revisions made.
- 5 ISS' Group DPM will maintain an up-to-date list of the ISS Entities bound by the BCR and will ensure that all new ISS Entities are bound by the BCR and can deliver compliance with the BCR before a transfer of personal data to them takes place.