



Data Transfers Policy

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1 Introduction

1.1 This data transfers policy (“**Policy**”) sets out how V. transfers Personal Data to a Third Country for processing.

1.2 This Policy:

- (a) Forms part of V.’s Data Protection Policy (<https://vgrouplimited.com/data-protection-overview/>); and
- (b) may be amended by V. at any time, consistent with the requirements of applicable laws and regulations. Any revisions will take effect from the date on which the amended Policy is published, as indicated by the version number.

2 Definition

2.1 “**Data Controller**” means the person or entity which, alone or jointly with others, determines the purposes and means of the processing of Personal Data;

“**Data Processor**” means any person or entity (other than an employee of the Data Controller) which processes Personal Data on behalf of the Data Controller;

“**Data Subject**” is as defined in the Data Protection; Policy;

“**Personal Data**” is as defined in the Data Protection Policy;



“**process**” or “**processing**” or “**processed**” is as defined in

the Data Protection Policy;

“**Third Country**” means any country outside the European Economic Area (“**EEA**”) and United Kingdom which is not subject to an adequacy decision by the European Commission and United Kingdom government or whose laws do not provide an adequate level of protection for the rights of Data Subjects in respect of their Personal Data; and

“**V.**” is as defined in the Data Protection Policy.

3 Scope

3.1 This Policy covers:

- (a)** the transfer of Personal Data from the United Kingdom and EEA to a Third Country;
- (b)** the transfer of Personal Data from a Third Country to another Third Country; and
- (c)** the transfer of Personal Data from China to a territory outside of China.

3.2 Such transfers include without limitation transfers to an international organisation which has locations in both a Third Country and the EEA. If making a transfer to an

international organisation located in a Third Country, simply because it has locations in both a Third Country and the UK or EEA does not stop this transfer from being a transfer to a Third Country.

3.3 This Policy is a global policy which applies to transfers made by V. globally.

3.4 The UK is a third country and has an adequacy decision as regards to it adopted by the European Commission. This means that Personal Data can flow freely from the EEA to the United Kingdom where it benefits from an essentially equivalent level of protection to that guaranteed under European Union law.

4 Transfers

4.1 When transferring Personal Data to Third Countries, in its capacity as a Data Processor, V. shall ensure that, prior to any such transfer, such transfers are permissible under the data processing agreement (or other contract containing the



relevant provisions required under EU or UK data protection laws) in place between the relevant V. entity and the Data Controller on whose behalf such V. entity is processing the Personal Data.

4.2 When transferring Personal Data to Third Countries, in its capacity as a Data Controller or Data Processor, V. shall ensure that, prior to any such transfer:

(a) It has carried out an appropriate transfer risk assessment, the scope of which is reasonable and proportionate taking into account the risk inherent in the data being transferred, the amount of data being transferred and the resources available to V. as Data Controller or Data Processor, for each category of Personal Data of which V. is making repeated or similar transfers; and

it has adopted an appropriate transfer mechanism, being (i) in respect of transfers of Personal Data from the UK only, the Information Commissioner's Office's International Data Transfer Agreement; or (ii) in respect of transfers of Personal Data from the EU, the European Commission's Standard Contractual Clauses (**SCCs**) and, to the extent that it also concerns the transfer of UK Personal Data, the UK Addendum to the EU SCCs.

(b) In relation to international transfers of Personal Data involving the Philippines, and/or Philippines citizens and residents, please see the Data Transfers Policy (Philippines) (<http://www.vgrouplimited.com/data-transfers-policy-philippines.aspx>).

(c) In relation to international transfers of Personal Data from China to a territory outside of China, V. shall ensure that, in relation to such transfer:

(i) it shall pass the security evaluation organised by the Cyberspace Administration of China ("CAC"); or

(ii) it shall have been certified by a specialised agency for protection of personal information in accordance with the provisions of the CAC; or

(iii) it shall enter into a contract with the overseas recipient under the standard contract formulated by the CAC, specifying the rights and obligations of both parties; or

(iv) it shall meet other conditions prescribed by applicable laws, administrative regulations or the CAC, and V. will take necessary measures to ensure that the Personal Data handling activities by an overseas recipient meet the standards for protection of that Personal Data described in this paragraph (c); and

(v) Data Subjects shall be informed of (i) the name of the overseas recipient, (ii) their contact information, (iii) the purpose and method of Personal Data handling, (iv) the type of Personal Data and (v) the



method and procedure for the Data Subjects to exercise their rights (stipulated in the Privacy Notice) against the overseas recipient, and such matters shall require separate consent; and

(vi) without the approval of the competent authorities of China, no Personal Data stored within the territory of China shall be provided to foreign judicial or law enforcement authorities directly.

(d) In relation to international transfers of Personal Data, V. will apply the appropriate transfer requirements under the Data Protection Laws applicable to that jurisdiction, the Personal Data being transferred or the Data Subject concerned.

4.3 The general prohibition on transfers of Personal Data to Third Countries can be derogated from in certain specific situations. A transfer, or set of transfers, may be made where the transfer is:

(a) made with the Data Subject's informed consent;

(b) necessary for the performance of a contract between the Data Subject and the recipient or for pre-contractual steps taken at the Data Subject's request;

(c) necessary for the performance of a contract made in the interests of the Data Subject between the controller and another person;

(d) necessary for important reasons of public interest;

(e) necessary for the establishment, exercise or defence of legal claims;

(f) necessary to protect the vital interests of the Data Subject or other persons, where the Data Subject is physically or legally incapable of giving consent; or

(g) made from a register which, by law, is intended to provide information to the public (and which is open to consultation by either the public in general or those able to show a legitimate interest in inspecting the register).

5 Data Integrity

5.1 V. shall only transfer any Personal Data in a manner that is consistent with the purposes for which such Personal Data was collected or otherwise processed. Prior to any such transfer, V. shall take reasonable steps to ensure that the Personal Data being transferred is accurate, complete, relevant and up to date.

6 Notice

6.1 V. shall ensure that any transfers of Personal Data are made within the parameters of any privacy or other notices that have been given to the Data Subjects to which the Personal Data relates. Any such notices about the possibility of transfer will have been



given at the time the Personal Data was collected, in clear and transparent language. If no such privacy notices were given, then such notices will be given to the relevant Data Subjects prior to transfer, unless a derogation or exemption applies.

7 Data Minimisation

7.1 V. limits the Personal Data to be transferred to the minimum necessary to fulfil the necessary processing purpose(s). The transfers shall be limited to those who need to know the same in connection with the processing purpose(s).

8 Documents Control

8.1 The General Counsel & Company Secretary is the owner of this Policy and is responsible for ensuring alongside the Global DPO that it is reviewed in line with the relevant review requirements.

8.2 A current version of this Policy is available at <https://vgrouplimited.com/data-protection-overview/>

8.3 This Policy was approved as stated in this Paragraph and is issued on a version-controlled basis.

Version	Details of Version(s)	Revision Approved by	Date
1	Initial Policy	Rod Day, Chief Financial Officer	05.04.2018
2	Update Policy	Deborah Grimason, General Counsel & Company Secretary	28.06.2019
3	Update Policy	Deborah Grimason, General Counsel & Company Secretary	06.12.2021
5	Update Policy	Niree Mahabeer, General Counsel & Company Secretary	11.08.2023