Roadmap: Applying the Principle of Accountability to Data Transfers in Practice

Ensuring compliance with the level of protection required under EU law of personal data transferred to third countries

Step 1: Know your transfers
- Adequacy decisions or derogation

Step 2: Identify the transfer tool you rely on
- Transfer tools: SCCs/BCRs/Certifications/...

Step 3: Is the transfer tool effective in the place of destination of your data?
- Yes, it offers an essentially equivalent level of protection
- No, there are gaps in the level of protection

Step 4: Can supplementary measures fill the gaps?
- NO: Do not start transferring personal data
- YES: Take applicable procedural steps

Step 5: Regularly re-evaluate the level of protection of the personal data transferred

Step 6: Suspend/endo ongoing transfers

EDPB European Data Protection Board