



## GDPR, Brexit and Citrix Services

At Citrix, we are aware that the United Kingdom's exit from the European Union (**Brexit**) has raised questions among our customers about how their use of Citrix cloud, technical support and consulting services (**Services**) may be impacted. This letter is designed to provide you with a better understanding of how Brexit does (and does not) impact your use of Citrix Services.

### Background

The United Kingdom (**UK**) left the European Union (**EU**) on 31 January 2020 and entered a Transition Period which ended on 31 December 2020. Following the Transition Period, a UK version of the GDPR will apply to our UK-based processing activities involved in the delivery of our Services (**UK GDPR**). This will operate alongside the EU GDPR provisions which have extra-territorial effect and are designed to protect the personal data of individuals under its scope.

The UK GDPR is aligned with the GDPR in most respects, but is adapted to work in a "non-EU" context. It has extra-territorial effect designed to protect the personal data of individuals under its scope (in the same way that the EU GDPR currently does). The core data protection principles – namely, the controller and processor obligations and rights of individuals – will remain substantially the same under the UK GDPR as under the EU GDPR. However, the mechanisms by which we transfer personal data to and from the UK will change.

### Cross Border Personal Data Transfers

Starting January 1, 2021 the following will apply to transfers of personal data to and from the UK:

- *UK to the EU:* Transfers of personal data from the UK to the EU will continue uninterrupted because the UK government has deemed the EU to be adequate to allow for data flows from the UK, pending further review.
- *EU to the UK* – To date, the EU has not made an adequacy decision in favor of the UK. However, the [EU-UK Trade and Cooperation Agreement](#) provides a bridging mechanism that allows transfers of personal data from the EU to the UK pending any adequacy decision in favour of the UK, for at least 4 months, with an option to be extended to 6 months. If no adequacy decision is made by then, where applicable, Citrix will rely on valid and appropriate transfer mechanisms required for transfers outside of the EU, such as the European Commission Standard Contractual Clauses. Please see [the Information notice of the EDBP](#) or [here](#) for further information about the bridging mechanism.
- *UK to non-EU countries:* Personal data transfers from the UK to countries already covered by an EU adequacy decision<sup>1</sup> will continue uninterrupted. Transfers from those third countries to the UK are very likely to continue uninterrupted (the UK government has stated that 11 of these 12 countries have confirmed this – confirmation from Andorra is awaited). Transfers from the UK to all other countries will require a transfer mechanism, and we plan to rely on the European Commission Standard Contractual Clauses, [an approach that the UK Information Commissioner's Office has endorsed](#).

<sup>1</sup> Andorra, Argentina, Canada (commercial organizations only), Faroe Islands, Guernsey, Isle of Man, Israel, Japan (private-sector organizations only), Jersey, New Zealand, Switzerland and Uruguay.



## Citrix Contract Terms

Citrix provides [data processing terms in its Data Processing Addendum \(DPA\)](#) that align to the applicable sections of the EU GDPR and UK GDPR, including the [EU Standard Contractual Clauses](#). The DPA is incorporated by reference into Services contracts and does not require execution. However, the Citrix EU Standard Contractual Clauses (SCCs) may be signed at your option.

If you would like to sign the SCCs, an executable version is available by following a few simple steps:

1. Go to Citrix.com and Sign In to your Citrix My Account,
2. Click “View EU Standard Contractual Clauses” on the left side, and
3. Click “Sign Document” to complete the SCCs electronically.

## More Information

For more information about Citrix Privacy Compliance and Security practices, please see our [Trust Center](#).

The Citrix Privacy Team

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