

## **CROSS BORDER DATA TRANSFER ADDENDUM (EVENTS)**

This Cross Border Data Transfer Addendum (Events) forms part of the agreement entered into between With Intelligence and the Client ("Agreement"). This Cross Border Data Transfer Addendum (Events) is not intended to act as a stand-alone agreement.

### **BACKGROUND**

This Addendum has been issued by the Information Commissioner for Parties making Restricted Transfers. The Information Commissioner considers that it provides Appropriate Safeguards for Restricted Transfers when it is entered into as a legally binding contract.

The Importer is situated outside of the UK in a territory which does not benefit from an adequacy decision pursuant to Article 45 of Regulation (EU) 2016/679 (an **Adequacy Decision**).

The Exporter is a service provider and the Importer is the client or customer of the Exporter. This Addendum is entered into and forms part of the agreement between the Exporter and the Importer created by the Order Form.

The Exporter is located within the United Kingdom and is entering into this Addendum with the Importer in order to fulfil its legal obligations to institute appropriate safeguards for restricted transfers when sharing personal data with entities who are based in countries which do not benefit from an Adequacy Decision.

Any capitalised terms used below shall have the meaning given to them in the Order Form.

**AGREED TERMS**

**Table 1: Parties**

The Parties	Exporter (who sends the Restricted Transfer)	Importer (who receives the Restricted Transfer)
<b>Parties' details</b>	As set out on the Order Form.	As set out on the Order Form
<b>Key contacts</b>	Full name (optional): Richard Kelly	As set out on the Order Form.
	Job title: General Counsel of With Intelligence Limited	
	Contact details including email: Richard.Kelly@withintelligence.com	
	Full name (optional): Richard Kelly	
	Job title: General Counsel of Pageant Gaming Media Limited	
	Contact details including email: Richard.Kelly@withintelligence.com	

**Table 2: Selected SCCs, Modules and Selected Clauses**

Addendum EU SCCs		<input checked="" type="checkbox"/> The Approved EU SCCs, including the Appendix Information and with only the following modules, clauses or optional provisions of the Approved EU SCCs brought into effect for the purposes of this Addendum.				
Module	Module in operation	Clause 7 (Docking Clause)	Clause 11 (Option)	Clause 9a (Prior Authorisation or General Authorisation)	Clause 9a (Time period)	Is personal data received from the Importer combined with personal data collected by the Exporter?
1	X			-	-	-
2						-
3						-

4				-	-	
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**Table 3: Appendix Information**

"Appendix Information" means the information which must be provided for the selected modules as set out in the Appendix of the Approved EU SCCs (other than the Parties), and which for this Addendum is set out in:

List of Parties: <b>Annex 1A</b>
Description of Transfer: <b>Annex 1B</b>
Technical and organisational measures including technical and organisational measures to ensure the security of the data: <b>Annex II</b>
List of Sub processors (Modules 2 and 3 only): <b>N/A</b>

**Table 4: Ending this Addendum when the Approved Addendum changes**

Ending this Addendum when the Approved Addendum changes	<p>Which Parties may end this Addendum as set out in Section 19:</p> <p><input checked="" type="checkbox"/> Importer</p> <p><input checked="" type="checkbox"/> Exporter: any Exporter may end this Addendum without being obliged to obtain the consent of any other Exporters</p> <p><input type="checkbox"/> Neither Party</p>
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**Part 2: Mandatory Clauses**

Mandatory Clauses	<p>Part 2: Mandatory Clauses of the Approved Addendum, being the template Addendum B.1.0 issued by the ICO and laid before Parliament in accordance with section 119A of the Data Protection Act 2018 on 2 February 2022, as it is revised under Section 18 of those Mandatory Clauses.</p>
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## **Annex 1A – List of Parties**

### **Data exporter(s):**

1. Name: With Intelligence Limited (or such other entity as may be listed in the Order Form)

Address: 1 London Wall, London, England, EC2Y 5EA

Contact person's name, position and contact details: Richard Kelly, General Counsel,  
Richard.Kelly@withintelligence.com

Activities relevant to the data transferred under these Clauses: The delivery of the services set out in the Order Form.

Role (controller/processor): Controller

### **Data importer(s):**

Name: The Client (as is set out on the Order Form)

Address: As listed in the Order Form

Contact person's name, position and contact details: As listed in the Order Form

Activities relevant to the data transferred under these Clauses: The receipt of the services set out in the Order Form.

Role (controller/processor): Controller

## **Annex 1B – Description of Transfers**

### **Data subjects**

The personal data transferred concern the following categories of data subjects:

*Employees of the Data Exporter(s); Customers/clients and employees of customers/clients of the Data Exporter(s); event attendees; registered product users; details of individuals who have been captured and added to the Data Exporter(s)'s product databases*

### **Purposes of the transfer(s)**

The transfer is made for the following purposes:

*To ensure that the services more particularly described in the Order Form are delivered in accordance with its terms; to allow for the successful running of events operated by the Data Exporter; to fulfil contracts entered into by the Data Exporter.*

### **Categories of data**

The personal data transferred concern the following categories of data:

- *Identity data, including first names, last names, job titles, dates of birth and gender;*

- *Contact data including billing addresses, delivery addresses, email addresses and telephone numbers;*
- *Marketing and Communications data including personal preferences in receiving marketing from us and our third parties and any communication preferences.*

Recipients

The personal data transferred may be disclosed only to the following recipients or categories of recipients:

*Such employees of the Data Importer who need to know it for the purposes set out in the Order Form or for obtaining the benefit of the services provided by way of the Order Form.*

Sensitive data (if appropriate)

The personal data transferred concern the following categories of sensitive data:

*None*

Data protection registration information of a data exporter (where applicable)

*Pageant Gaming Media Limited is registered with the UK ICO under number ZA591417*

*With Intelligence Limited is registered with the UK ICO under number ZB495642*

Additional useful information (storage limits and other relevant information)

*Access to personal data by the Data Importer shall be limited to its employees who strictly need-to-know the personal data for fulfilling the purpose set out in this Annex 1B.*

Contact points for data protection enquiries

<b>Exporter</b>	<b>Importer</b>
Entity: As per Order Form  Contact: Richard Kelly, General Counsel Richard.Kelly@withintelligence.com  One London Wall, London, EC2Y 5EA, United Kingdom	Entity: As per Order Form  Contact: As per Order Form

**Annex II - Technical and organisational measures including technical and organisational measures to ensure the security of the data:**

Both parties will take appropriate technical and organizational measures to ensure the security of processing, having taken account of the level of risk involved. This includes ensuring that staff are subject to a duty of confidence.