



## Frequently Asked Questions

### 1. What are Binding Corporate Rules (BCRs)?

Binding Corporate Rules (BCRs) are a set of internal data protection policies that can be adopted by large multinational companies to ensure **lawful and secure transfer of personal data within the corporate group from European Economic Area (EEA) entities to entities located outside the EEA (third countries)**. BCRs also provide Autodesk with a **comprehensive framework for protecting personal data** across borders and maintaining consistent data privacy standards throughout our company. Our BCRs consist of two separate policies:

- a) the [Controller Policy](#): governs personal data that Autodesk transfers as a controller.
- b) the [Processor Policy](#): governs data Autodesk transfers as a processor.

### 2. Did Autodesk receive BCR Approval?

Yes. Autodesk received formal approval of its BCRs from the Irish Data Protection Commission (IDPC) for the first time on May 24<sup>th</sup>, 2023, following an extensive consultation period with EU data protection authorities. Both BCRs are updated yearly, and the most recent update was approved by the DPC in July 2024, reflecting improvements in its privacy program and complying with recent EDPB requirements. The BCRs available in Autodesk's Trust Center are the most updated version of it.

### 3. What benefits will the implementation of BCRs bring to Autodesk and our customers?

BCRs provide significant benefits for Autodesk and our customers. Because BCRs are subject to Data Protection Authority approval, they are a strong demonstration of Autodesk's commitment to Privacy and to respect people's rights wherever they are located. They promote **consistent data governance practices** across subsidiaries and business units, reducing risk, and enhancing privacy protection. Finally, BCRs provide a **legal mechanism for onward data transfers** between affiliates in different regions, ensuring lawful and efficient operations. This is important to our Customers, since our Processor BCR covers all transfers related to data processing activities made on behalf of our Customers.

### 4. How do BCRs differ from other data protection mechanisms, and why did we choose them?

BCRs differ from other GDPR data protection mechanisms, such as standard contractual clauses or adequacy decisions, as they are company-specific and require approval from data protection authorities. We chose them to provide greater legal certainty for our transfers of personal data from the EEA to third countries.

## **5. What other international data transfer mechanisms does Autodesk rely on?**

Besides relying on adequacy decisions and having approved and updated BCRs, Autodesk relies on a Data Privacy Framework certification (DPF) for transfers from the EU, UK, and Switzerland to the United States. You can verify Autodesk's certification status [here](#). Other than that, whenever we need to perform data transfers not covered by Autodesk's BCRs and DPF certification, Autodesk's relies on Standard Contractual Clauses (SCC) with third parties (such as vendors and sub-processors), following a Transfer Impact Assessment process to safeguard such transfer.

## **6. Where can Customers request Autodesk's BCRs?**

Autodesk's BCRs are available via the Autodesk [Trust Center](#), or can be requested via [privacy.questions@autodesk.com](mailto:privacy.questions@autodesk.com).