



## Frequently Asked Questions

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

Binding Corporate Rules (BCRs) are a set of internal data protection policies that are generally adopted by large multinational companies to ensure **lawful and secure transfer of personal data within the corporate group from EEA** entities to entities located outside the EEA (**third countries**). Our BCRs consist of two separate policies: the **Controller Policy**, and the **Processor Policy**. The Controller Policy governs personal data that Autodesk transfers as a controller, while the Processor Policy governs where Autodesk acts as a processor. BCRs also provide Autodesk with a **comprehensive framework for protecting personal data** across borders and maintaining consistent data privacy standards throughout our company.

### 2. Did Autodesk receive BCR Approval?

Yes. Autodesk received formal approval of its BCRs from the Irish Data Protection Commission (IDPC) on May 24<sup>th</sup> 2023, following an extensive consultation period with EU data protection authorities.

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

Binding Corporate Rules (BCRs) will provide significant benefits for Autodesk and our customers. Firstly, they will help **strengthen trust between Autodesk and both customers and regulators**. Secondly, they will promote **consistent data governance practices** across subsidiaries and business units, reducing risk, and enhancing privacy protection. Thirdly, BCRs provide a **legal mechanism for onward data transfers** between affiliates in different regions, ensuring lawful and efficient operations. Overall, BCRs will enhance Autodesk's reputation as a trusted company.

### 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 BCRs do not cover?**

BCRs **are not a one-size fits all solution** for all data transfer scenarios. They are not the same as other transfer mechanisms (such as adequacy decision or Standard Contractual Clauses “SCCs”). BCRs are specific for large multinational corporations as they provide internal framework for ensuring lawful transfers within the company group. This does not automatically mean that external data transfers are covered by BCRs, additional mechanisms may be required for those scenarios. Also, our BCRs apply to personal data transfers from the EU and do not address data transfer issues related to government data, sensitive industry sector data, non-EU data, etc.

## **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) . Autodesk will update its Data Protection Agreement shortly to reflect the Processor BCRs.