# CROSS-BORDER DATA TRANSFER POLICY

JANUARY 2026

POLICY NUMBER: TMG-SEC-052
APPROVAL AUTHORITY: BOARD OF DIRECTORS

THE MAZI GROUP

# 1. PURPOSE

This Cross-Border Data Transfer Policy establishes The Mazi Group's framework for transferring personal data across international borders in compliance with data protection laws. As a global company, we must ensure that data transfers maintain adequate protection regardless of where data is processed. This policy applies across all brands: Mazi Beauty, Glam Switch, On The Go Mists, and Upvendo.

# 2. SCOPE

This policy applies to:

- All transfers of personal data across national borders
- All brands and business units
- All employees handling personal data
- Third-party processors receiving data internationally
- Intra-group data transfers

# 3. LEGAL FRAMEWORK

## 3.1 European Union (GDPR)

- Transfers outside EEA require legal basis
- Adequacy decisions
- Standard Contractual Clauses (SCCs)
- Binding Corporate Rules
- Derogations for specific situations

## 3.2 United Kingdom

- UK GDPR requirements
- UK adequacy decisions
- International Data Transfer Agreement (IDTA)

## 3.3 United States

- EU-US Data Privacy Framework
- State privacy law requirements

- Sectoral requirements

### 3.4 Other Jurisdictions

- Canada PIPEDA
- Brazil LGPD
- Other applicable data protection laws

## 4. TRANSFER MECHANISMS

### 4.1 Adequacy Decisions

- Transfers to countries with adequacy status
- No additional safeguards required
- Monitor adequacy status changes

### 4.2 Standard Contractual Clauses (SCCs)

- EU-approved contractual terms
- Controller-to-controller transfers
- Controller-to-processor transfers
- Processor-to-processor transfers
- Transfer Impact Assessment required

### 4.3 Binding Corporate Rules (BCRs)

- Intra-group transfer mechanism
- Requires regulatory approval
- Comprehensive data protection commitments

### 4.4 EU-US Data Privacy Framework

- Self-certification by US organizations
- Verify recipient certification
- Monitor framework validity

### 4.5 Derogations

Limited use for specific situations:

- Explicit consent
- Contract performance
- Legal claims
- Vital interests
- Public interest

## 5. TRANSFER IMPACT ASSESSMENT

### 5.1 When Required

- Transfers relying on SCCs
- Transfers to countries without adequacy
- Changes in circumstances

### 5.2 Assessment Elements

- Nature of data transferred
- Destination country laws
- Government access risks
- Supplementary measures needed
- Effectiveness of safeguards

### 5.3 Supplementary Measures

- Technical measures (encryption, pseudonymization)
- Organizational measures (access controls, policies)
- Contractual measures (additional commitments)

## 6. DATA TRANSFER INVENTORY

- Maintain inventory of cross-border transfers
- Document transfer mechanisms used
- Track data recipients
- Record countries of destination
- Regular review and updates

## 7. THIRD-PARTY TRANSFERS

### 7.1 Vendor Assessment

- Assess data protection practices
- Verify transfer mechanisms
- Review security measures
- Due diligence documentation

### 7.2 Contractual Requirements

- Data Processing Agreements
- Standard Contractual Clauses
- Security requirements
- Audit rights
- Sub-processor restrictions

## 8. INTRA-GROUP TRANSFERS

- Identify intra-group data flows
- Implement appropriate mechanisms
- Intra-group data sharing agreements
- Consider BCRs for extensive transfers

## 9. CLOUD SERVICES

- Assess cloud provider data locations
- Verify transfer mechanisms
- Data residency options
- Contractual protections
- Monitor for changes in data locations

## 10. DATA LOCALIZATION

- Identify data localization requirements
- Implement local storage where required

- Document compliance approach
- Monitor for new requirements

## 11. INCIDENT RESPONSE

- Report transfer-related incidents
- Assess impact on data subjects
- Notify authorities if required
- Document and remediate

## 12. TRAINING

- Data transfer training for relevant staff
- Awareness of transfer requirements
- Updates on regulatory changes

## 13. DOCUMENTATION

- Transfer impact assessments
- Contractual agreements
- Transfer inventory
- Compliance records

## 14. ROLES AND RESPONSIBILITIES

### 14.1 Privacy/Legal

- Oversee transfer compliance
- Conduct transfer impact assessments
- Negotiate transfer agreements
- Monitor regulatory developments

### 14.2 IT

- Implement technical safeguards
- Manage cloud and infrastructure

- Support data localization

### 14.3 Business Units

- Identify data transfer needs
- Engage Privacy for new transfers
- Comply with transfer requirements

## 15. RELATED POLICIES

This policy should be read in conjunction with:

- TMG-SEC-016: Data Privacy and Protection Policy
- TMG-SEC-018: Consumer Data Rights and CCPA/GDPR Compliance
- TMG-SEC-019: Third-Party Data Sharing and Processing Agreements
- TMG-SEC-040: Cloud Computing and SaaS Governance Policy

## 16. POLICY REVIEW

This policy shall be:

- Reviewed annually by Privacy and Legal
- Updated for regulatory changes
- Approved by DPO and CLO
- Communicated to relevant personnel

## 17. DEFINITIONS

- **Cross-Border Transfer:** Movement of personal data from one country to another.
- **Adequacy Decision:** Determination that a country provides adequate data protection.
- **SCCs:** Standard Contractual Clauses - pre-approved contract terms for transfers.
- **BCRs:** Binding Corporate Rules - intra-group transfer mechanism.
- **TIA:** Transfer Impact Assessment - evaluation of transfer risks.

**For questions about this policy, contact:**
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