

Checklist of documents to be provided to supervisory authorities for approval of binding corporate rules

- The main principles document.
- A document setting out third-party rights if the third-party rights clause is not contained in the main principles document.
- The appropriate application form ([WP 264](#) for controllers and [WP 265](#) for processors).
- Documents to make the BCRs binding (for example, resolution of a parent company board to make the principles binding; employee notice to require application of the principles; pro forma contract terms for use with subcontractors; intra-group contract which confers third-party rights).
- Supporting documents that demonstrate that commitments in the BCRs are being respected. This may include:
 - privacy policies used to inform data subjects about the way the company protects their personal information;
 - guidelines for employees that have access to personal data to help the employees easily understand and apply the rules set out in the BCRs;
 - a data protection audit plan and programme;
 - examples and explanations for the training programme for employees;
 - documents demonstrating that the member of the group transferring data outside the EEA, and either the EEA group headquarters or EEA member with delegated data protection responsibilities has sufficient assets to pay any compensation resulting from breach of the BCRs;
 - a description of the internal complaint system;
 - a list of entities in the group bound by the BCRs;
 - a security policy for IT systems that process EU personal data;
 - a certification process to ensure that all new IT applications that process EU personal data are compliant with the BCRs;
 - any standard contracts that are used with processors (including within the corporate group and entities outside the group) that process EU personal data; and
 - a job description of any DPOs or other persons that are in charge of data protection in the company.