



The Association of Compliance Officers in Ireland

ACOI Schrems II Member Survey

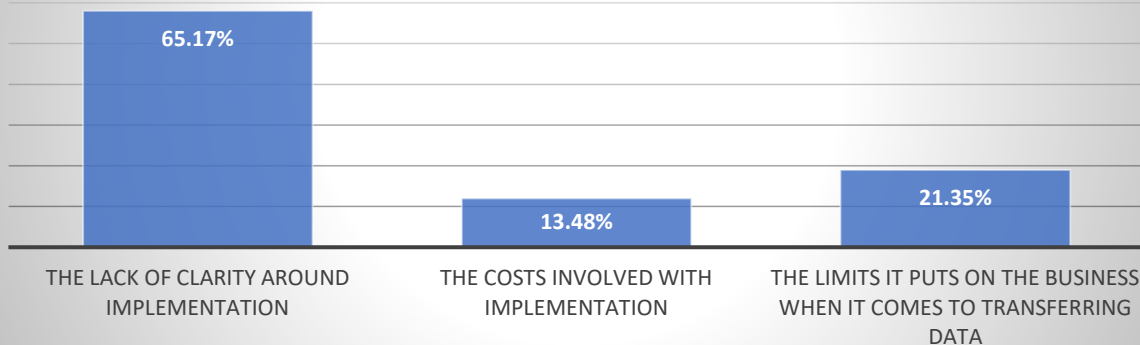
Issued to ACOI Members on 4th November 2020

Is the CJEU's decision in the Schrems II case likely to have a negative impact on the way in which your firm can transfer data internationally?



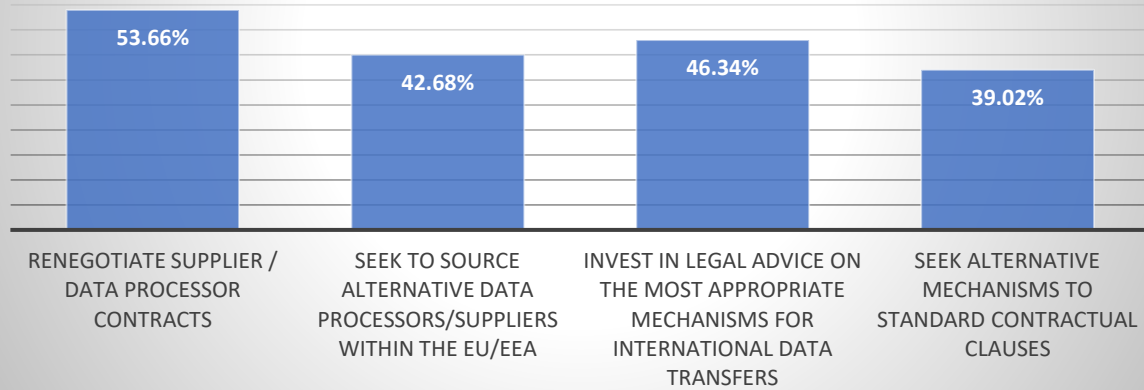
Yes	51.11%
No	48.89%

What do you believe is the biggest challenge facing your business on the back of this ruling?



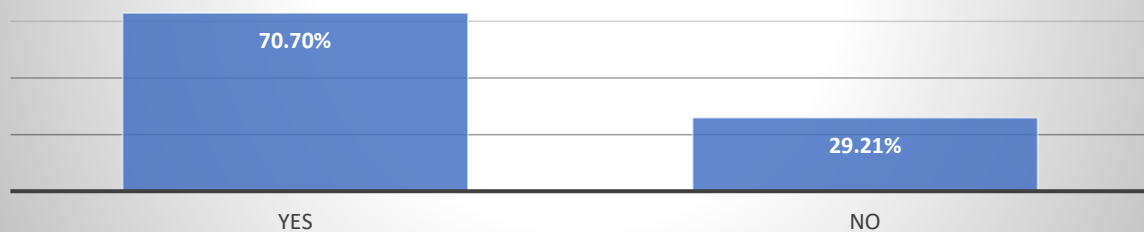
The lack of clarity around implementation	65.17%
The costs involved with implementation	13.48%
The limits it puts on the business when it comes to transferring data	21.35%

What actions will your firm need to undertake in response to the CJEU's decision in the Schrems II case? Please tick as many answers that are applicable to you.



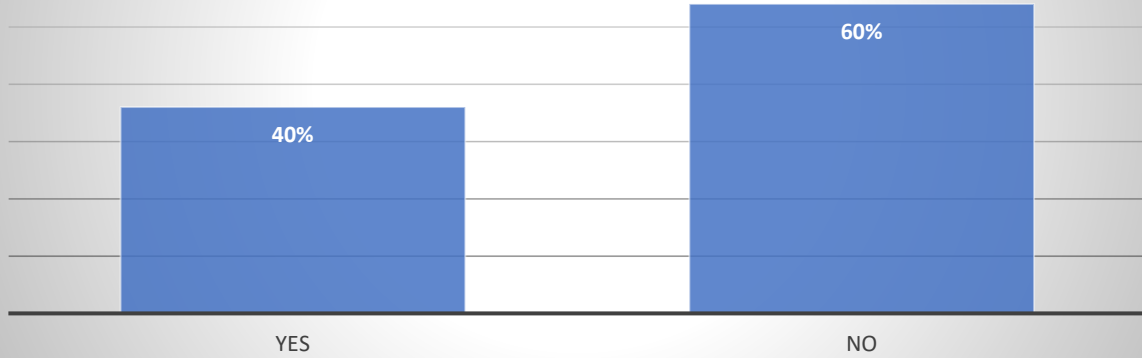
Renegotiate supplier / data processor contracts	53.66%
Seek to source alternative data processors/suppliers within the EU/EEA	42.68%
Invest in legal advice on the most appropriate mechanisms for international data transfers	46.34%
Seek alternative mechanisms to standard contractual clauses	39.02%

Do you think the Government should provide interim solutions that will allow companies to continue to transfer data until an effective substitute is in place?



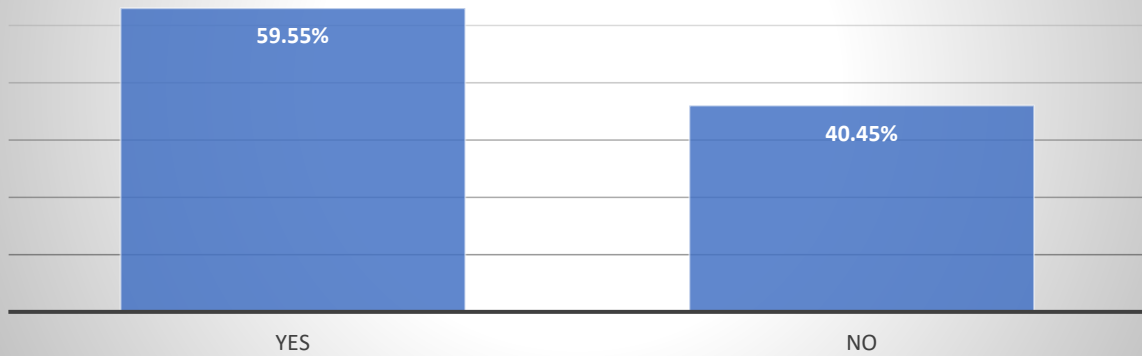
Yes	70.79%
No	29.21%

Will the decision affect your firm's current or future ability to do business with the US?



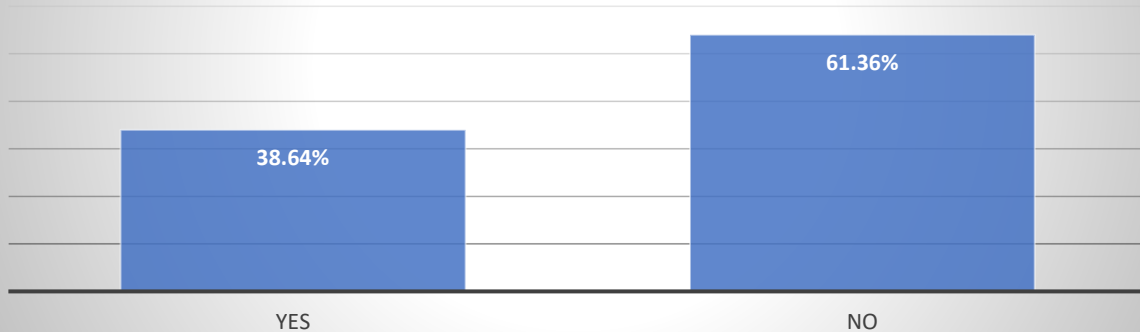
Yes	40%
No	60%

Will the decision affect your firm's ability to do business with UK firms post-Brexit?



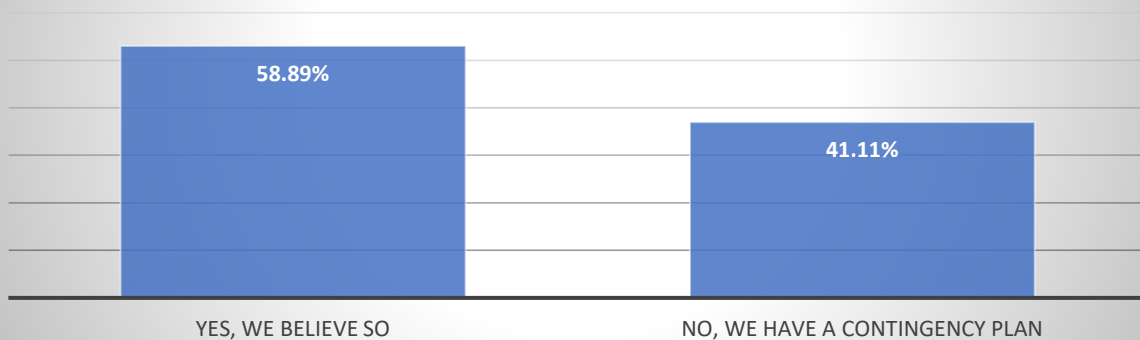
Yes	59.55%
No	40.45%

Has your firm taken steps to restrict/cease personal data transfers to the UK in light of Schrems II and Brexit?



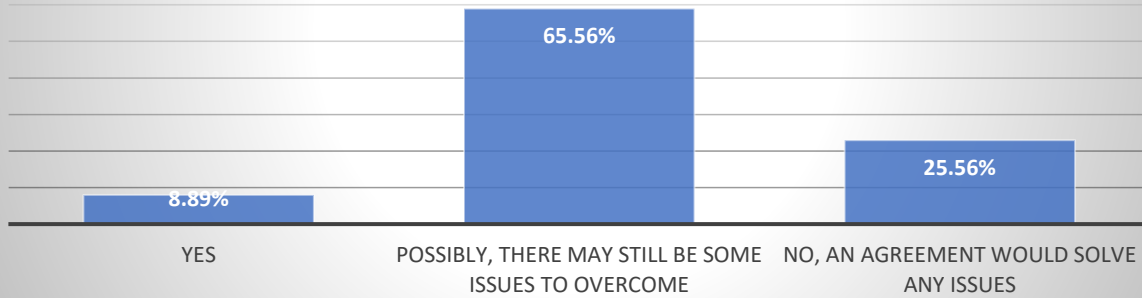
Yes	38.64%
No	61.36%

If Brexit negotiations are unsuccessful, will your firm need to restrict the transfer of data to the UK in 2021?



Yes, we believe so	58.89%
No, we have a contingency plan	41.11%

If Brexit negotiations are successfully concluded, will your firm need to restrict the transfer of data to the UK in 2021?



Yes	8.89%
Possibly, there may still be some issues to overcome	65.56%
No, an agreement would solve any issues	25.56%