



**To: Mr. Didier Reynders**  
*European Commissioner for Justice*

**Cc: Mr Bruno GENCARELLI**  
*Head of Unit, International data flows and protection, DG Justice*

Brussels, 1<sup>st</sup> December 2020

**Subject: European Commission Standard Contractual Clauses for transferring personal data to non-EU countries**

Dear European Commissioner Reynders,

Our associations welcome the opportunity to participate in the recently launched consultation on the European Commission Standard Contractual Clauses for transferring personal data to non-EU countries.

Businesses from the financial services sector of all sizes rely on standard contractual clauses (SCCs) for data transfers that are essential to their activities. The European Commission’s implementing decision will have significant consequences for their compliance efforts and business continuity, notably in light of recent rulings in the Court of Justice of the European Union, and we want to make sure our consultation responses accurately reflect the diversity of our Members and believe that this will take time to do it right.

Furthermore, the European Data Protection Board recently released its own consultation related to the transfer of personal data to non-EU countries with a similar timeline.

In light of the above, and the vital importance of data transfers to third countries for business, we would urge the European Commission to extend the deadline for responses until after the holiday period, to mid-January, in order to allow for meaningful feedback.

We thank you for your attention and remain available to discuss these issues further.

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