

**SIEMENS**

# **UK Binding Corporate Rules Summary Document**

**19 September 2025**

## 1 Introduction

At Siemens, we prioritise data protection and are fully committed to maintaining high standards of corporate responsibility. We have implemented [Binding Corporate Rules](#) under EU data protection law (“**EU BCR**”), which have been in place since 2014. Following Brexit, to ensure proper safeguarding of personal data originating from the United Kingdom (“**UK**”) in our internal international transfers, Siemens integrated a UK Addendum into its approved EU BCR. The EU BCR as amended by the UK Addendum forms Siemens’ UK Binding Corporate Rules (“**UK BCR**”).

## 2 Scope: Siemens UK BCR Members and countries where Siemens UK BCR Members are located

A list of participating Siemens companies and contact details can be found in [Appendix A](#) to the Siemens UK BCR (each a “**BCR Member**”). Siemens plc of Pinehurst 2, Pinehurst Road, Farnborough, Hampshire GU14 7BF is the “Lead BCR Member”.

The UK BCR apply:

- to the processing of all personal data transferred from BCR Members which are subject to the territorial scope of Article 3 of the UK GDPR (wherever located) to BCR Members located outside the UK; and
- to the processing of personal data by BCR Members located in the UK.

## 3 Data processing under the UK BCR

Appendix B provides details regarding (i) the types of individuals, (ii) the categories of personal data that may be processed about them, (iii) the types of processing and (iv) the reasons for such processing of that personal data.

## 4 Rights of Relevant Data Subjects

Individuals whose personal data are processed under these UK BCR have the same rights as are granted under [Siemens EU BCR](#). These rights include:

- the right to be informed about the collection and the use of their personal data
- the right to access personal data and supplementary information
- the right to have inaccurate personal data rectified, or completed if it is incomplete
- the right to erasure (to be forgotten) in certain circumstances
- the right to restrict processing in certain circumstances
- the right to data portability, which allows the data subject to obtain and reuse their personal data for their own purposes across different services
- the right to object to processing in certain circumstances
- rights in relation to automated decision making and profiling
- the right to withdraw consent at any time (where relevant)
- the right to complain to the Information Commissioner

Each such individual can assert any of the above rights via the channels described in Section 5.

## 5 Questions, requests and complaints

Questions and requests about the UK BCR, and complaints about a breach of the UK BCR by a BCR Member, can be submitted by any data subject to any of the following:

- the Data Privacy Manager of the Lead BCR Member, **Siemens plc**, Sir William Siemens House, Princess Rd, Manchester M20 2UR, email: [dataprotection.uk@siemens.com](mailto:dataprotection.uk@siemens.com),
- the office of the Siemens Chief Data Privacy Officer at **Siemens Aktiengesellschaft**, Werner von Siemens Str. 1, D-80333 Munich, email: [dataprotection@siemens.com](mailto:dataprotection@siemens.com), or
- the data privacy contact at the respective BCR Member against which the complaint is directed (please refer to [Appendix A](#) for contact details).

The relevant individual will be given prompt confirmation of receipt of the complaint and the complaint will be processed within one month of receipt. In complex or in exceptional cases this will extend to three months, with the individual informed accordingly. This timeframe can be exceeded in case of delays not attributable to a BCR Member (for example if the complainant does not provide necessary information in a timely manner).

Independently from this complaint mechanism, each individual whose data is processed under the UK BCR has the right to:

- use the Siemens whistleblower hotline. The various contact forms for this hotline are linked on the footnote of every Siemens Internet webpage; and
- to complain directly to the UK Information Commissioner's Office.

## 6 Complaints made to the Information Commissioner's Office

Data subjects can complain directly to the ICO about the way a Siemens BCR member has handled their personal information: <https://ico.org.uk/make-a-complaint/data-protection-complaints/what-to-expect/>.

## 7 Claims in UK courts for a breach of the UK BCR Addendum

Any individual whose personal data is processed under the UK BCR ("Relevant Data Subject") is entitled to bring a claim (i) against a BCR Member if it breaches the UK BCR Addendum and/or (ii) against the Lead BCR Member for any breach of the UK BCR by a BCR Member.

In addition, certain regulations in the UK BCR confer rights directly on Relevant Data Subjects, as third-party beneficiaries. The applicable rights are set out and explained in detail in Sections 4.5, 7.1.3 and 7.2 of the EU BCR.

In bringing a claim under this UK BCR Addendum, a Relevant Data Subject may be represented by a not-for-profit body, organization, or association under the conditions set out in Article 80(1) UK GDPR and sections 187 to 190 of the Data Protection Act 2018.

The Lead BCR Member agrees to be fully liable to Relevant Data Subjects and to the ICO for all material and non-material loss and damage caused directly or indirectly by any BCR Member's breach of this UK BCR Addendum, including where caused by any BCR Member's processor.

## Appendices

### [Appendix A - List of Companies Bound by the UK BCR](#)

### [Appendix B - Categories of data subjects, personal data, and processing activities](#)