

Leidos Intra-Group Data Transfer Agreement (“IGA”)

Due to the international nature of its business, Leidos Group¹ entities (“Leidos Group”) may, in the ordinary course of business, transfer personal data globally. For example, to manage and deliver HR-related services and benefits, the Leidos global HR team may need to collect, access, process and/or transfer (collectively, “transfers”) personal data about Leidos employees, contractors and consultants.

Data protection laws in jurisdictions where Leidos has both employees and business operations may impose restrictions on the transfer of personal data outside of those jurisdictions - for example, the General Data Protection Act (GDPR) imposes such restrictions.² This means that transfers of personal data from the European Union (EU) to a country or territory outside of the European Economic Area (EEA) are permitted only under certain permissible conditions.

One such condition is the requirement to sign the EU Standard Contractual Clauses (SCCs). The SCCs, which are non-negotiable, are available in different versions.³ These contract provisions incorporate in detailed and explicit terms: 1) all the steps necessary for the lawful transfer of personal data outside of the EU and 2) all of the steps a “Data Exporter” (in the EEA) and a “Data Importer” (in a non-EEA country) must follow to be in compliance with the GDPR.

How Does Leidos Meet These Data Transfer Obligations?

To meet these legal requirements for personal data transfers, Leidos has implemented an Intra-Group Agreement (IGA). The IGA legally effectuates such transfers from the EEA to non-EEA countries.

Which Leidos Entities are Appropriate Signatories?

Those entities which have actual employees (on an at-will basis or by contract). Not all Leidos entities have actual employees – thus, many Leidos entities are not signatories to the IGA but may be listed as a potential Data Exporter or Data Importer if they provide services or personnel in support of Leidos technical or administrative infrastructure.

Does the IGA Also Meet AU Privacy Law Requirements?

Yes. The IGA includes legal terms - as well as descriptions of data transfers, categories of data and security measures - that align with the [Australian Privacy Act and Australian Privacy Principles](#).

¹ Leidos Group" means Leidos, Inc., a Delaware corporation with a principal place of business at 1750 Presidents Street, Reston, Virginia 20190, and Leidos Innovations Corporation, a Delaware corporation with a principal place of business at 1750 Presidents Street, Reston, Virginia 20190 and any Leidos Affiliate.

² Other (non-EU) privacy laws also impose restrictions on the international transfer of personal data or personal information.

³ Determining which version of the SCCs to use will depend on the types of entities processing the personal data (“Data Controller” vs. “Data Processor”).