

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 [EU General Data Protection Act \(GDPR\)](#) and the [UK GDPR](#) impose such restrictions.² Transfers of personal data from a country in the European Economic Area (EEA)³ or the United Kingdom (UK) to a country or territory outside those jurisdictions are permitted only under certain conditions.

One such condition is an obligation to sign the [EU Standard Contractual Clauses \(SCCs\)](#). The SCCs, which are non-negotiable, are available in different versions.⁴ 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 EU GDPR and UK 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

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 The EU GDPR applies to all 27 member countries of the European Union. It also applies to all countries in the European Economic Area.

⁴ Determining which version of the SCCs to use will depend on the types of entities processing the personal data (“Data Controller” vs. “Data Processor”). In addition, on 4 June 2021, the European Commission issued “modernized” standard contractual clauses for data transfers from controllers or processors in the EU/EEA (or otherwise subject to the GDPR) to controllers or processors established outside the EU/EEA (and not subject to the GDPR). These new SCCs will replace the three sets of SCCs that were adopted under the previous Data Protection Directive 95/46.

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 and other non-EU and non-UK data privacy/data protection 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](#) and similar laws.