



A note on Brexit and the Wonde service

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How could Brexit affect the service we receive from Wonde?

The Wonde service

Whilst it remains unclear whether the UK will leave the EU under a Withdrawal Agreement (“deal”) or otherwise, there remain two scenarios under which Wonde could be continuing to operate the service currently provided to you after the 31st October 2019;

1. The Wonde service in the event of a “deal” Brexit
2. The Wonde service in the event of a “no deal” Brexit

The provision of our service includes the processing of Personal Data. This processing is always conducted with the upmost diligence and in full compliance with the GDPR. In either of the above scenarios, Wonde will continue to provide its service responsibly and diligently in full compliance with the GDPR and any subsequent regulations.

As is common with many companies, some Wonde platforms operate from managed “cloud” hosting services. In either of the above “deal” or “no deal” scenarios, Wonde will continue to ensure that any partner it works with in the provision of its services are also in full compliance with the GDPR and any subsequent regulations.

Further information on our hosting services

Wonde is hosted in Amazon Web Services (AWS) facilities in Ireland. AWS computing environments are continuously audited, with certifications from accreditation bodies across the world, including ISO 27001, FedRAMP, DoD CSM, and PCI DSS. AWS is also fully compliant with applicable EU Data Protection laws, and the AWS Data Processing Agreement incorporates the Article 29 Working Party Model Clauses. Further details about the considerable measures Amazon take in securing their facilities and services can be found here: `

<https://aws.amazon.com/security/https://aws.amazon.com/compliance/>

Wonde also uses Azure’s Service Bus service hosted in their Europe West data centre. More information about Azure’s security can be found here:

<https://azure.microsoft.com/en-us/support/legal/security-overview/>

The Wonde service in the event of a “deal” Brexit

If a Withdrawal Agreement is concluded, in principle the GDPR would continue to apply in the UK until the end of 2020 (the currently stipulated ‘transition period’). In this case, nothing would change for the way in which Wonde processes Personal Data, which is currently carried out in accordance with the GDPR under UK law.

As such, transfers of personal data between the EEA and the UK (as occurs in our utilisation of the above mentioned hosting platforms) during that transition period will not qualify as international data transfers and will not require any additional safeguards¹.

The Wonde service in the event of a “no deal” Brexit

If no Withdrawal Agreement is concluded and the UK leaves the EU without a deal, UK businesses and organisations will still need to be compliant with data protection law.

There will be no immediate change to the UK’s data protection standards. The General Data Protection Regulation (GDPR) will be brought into UK law and the Information Commissioner would remain the UK’s independent supervisory authority on data protection¹. Wonde will therefore continue to provide its service responsibly and diligently in full compliance with the GDPR and any subsequent regulations.

In this scenario, the UK will be outside of the European Economic Area (“EEA”) at the time of exit. With regards to Wonde’s use of the AWS in Ireland, the UK will transitionally recognise all EEA states, EU and EEA institutions, and Gibraltar as providing an adequate level of protection for personal data. This means that personal data can continue to flow freely from the UK to these destinations following the UK’s exit from the EU. For data transfers from the EU, alternative mechanisms such as standard contractual clauses are available. Standard Contractual Clauses are a part of every AWS services agreement and can be found in the [AWS Data Processing Addendum](#)².

As a further contingency in the event of any currently unforeseen scenario, Wonde have also made provision to set-up UK availability through the London AWS instance in the event that it is required that we host certain data within the UK.

¹ <https://www.gov.uk/guidance/using-personal-data-after-brexit>

² <https://aws.amazon.com/compliance/gdpr-center/brexit/>