



Ministry of Local Government and Modernisation  
Attn: Minister Linda Hofstad Helleland  
Postboks 8112 Dep  
0032 Oslo

April 7, 2021

Dear Minister Hofstad Helleland,

Representing a wide breadth of industries in their transatlantic business pursuits, we at AmCham have a strong interest in international data transfer policies. Of specific focus currently are the European Data Protection Board's (EDPB) recommendations<sup>1</sup>, their comments on the draft SCCs for the transfer of personal data to third countries<sup>2</sup>, and Norway's subsequent regulatory implementation.

We recently submitted a response<sup>3</sup> to the EDPB Recommendations on measures that supplement transfer tools to ensure compliance with the EU level of protection of personal data. In our work to strengthen transatlantic trade and business relations, we firmly believe there is a need for clarity in Norway's interpretation of these recommendations.

Our companies are disproportionately impacted by the CJEU Schrems II decision as well as the EDPB recommendations. The need for clear and precise interpretation of these recommendations is evidenced by broad confusion over the legality of cloud services or data storage executed by third-country headquartered companies.

While we appreciate the work and pragmatic approach that Datatilsynet has taken in anticipation of a new Privacy Shield agreement, we see a need for enhanced cohesion in the messaging surrounding their application.

We therefore welcome an opportunity to speak with you on this matter at your convenience. Kindly advise and thank you for your consideration.

Sincerely,

Marit Schroeder

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<sup>1</sup>[https://edpb.europa.eu/sites/edpb/files/consultation/edpb\\_recommendations\\_202001\\_supplementarymeasurestransferstools\\_en.pdf](https://edpb.europa.eu/sites/edpb/files/consultation/edpb_recommendations_202001_supplementarymeasurestransferstools_en.pdf)

<sup>2</sup> [https://edpb.europa.eu/news/news/2021/edpb-edps-adopt-joint-opinions-new-sets-sccs\\_en](https://edpb.europa.eu/news/news/2021/edpb-edps-adopt-joint-opinions-new-sets-sccs_en)

<sup>3</sup> [https://edpb.europa.eu/sites/edpb/files/webform/public\\_consultation\\_reply/amcham\\_norway\\_-\\_edpb\\_r01\\_2020\\_response.pdf](https://edpb.europa.eu/sites/edpb/files/webform/public_consultation_reply/amcham_norway_-_edpb_r01_2020_response.pdf)