

# PHILIPS UK BCR Summary (Controller)

Contact details:

**Philips Legal function**

**c/o Philips International B.V.**

Prinses Irenestraat 59, 1077WV, Amsterdam, The Netherlands

e-mail: [privacy@philips.com](mailto:privacy@philips.com)

**To exercise your privacy rights or for any privacy related query, UK Individuals or Business Customers can contact us using our [privacy contact form](#).**

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## EU and UK BCRs

Philips is a global company with affiliates across the world. As such, Personal Data are shared regularly between all Philips Group Companies worldwide. Where such transfers are restricted under the EU or UK GDPR, Philips relies on approved Binding Corporate Rules (**BCRs**) as its appropriate safeguards under Article 46 of the EU and UK GDPR.

Philips may process and transfer Personal Data as a Controller or Processor. Philips therefore has approved Binding Corporate Rules for Controllers (the **Philips Privacy Rules**) as well as Binding Corporate Rules for Processors (the **Philips Processor Rules**). This UK BCR Summary covers only the Philips Privacy Rules.

Philips has put in place a UK BCR Addendum to ensure that the [Philips Privacy Rules](#) also provide appropriate safeguards for Transfers of Personal Data under the UK GDPR. For purposes of this UK BCRs Summary, the [Philips Privacy Rules](#) should be interpreted in accordance with the UK GDPR, in particular:

- General and specific references to the EU Data Protection Directive should be considered references to the nearest equivalent in the UK GDPR;
- Any reference to Member State or EEA Countries should be considered a reference to the UK;
- Any reference to the Data Protection Authority should be considered a reference to the ICO; and
- Any reference to Philips International B.V. should be considered a reference to Philips Electronics UK Limited.

This UK BCRs Summary provides a summarized version of the most important aspects of the Privacy Rules as they are relevant to UK Individuals (i.e., individuals to whom the Personal Data that falls under the scope of the UK Controller BCRs relates, as described below under “Scope of the UK Controller BCRs”, referred to as “**UK Individuals**”). Please refer to the full [Privacy Rules](#) for more information.

The Philips Privacy Rules, as they relate to UK Individuals, are referred to as the **UK Controller BCRs**.

## Scope of the UK Controller BCRs

The UK Controller BCRs apply to the Processing of Personal Data of Employees and Customers, Suppliers and Business Partners by or on behalf of all Philips Group Companies in their role as a Controller of Personal Data where:

- i. the Processing of Personal Data is subject to the UK GDPR (or was subject to the UK GDPR prior to its transfer outside of the UK).
- ii. is Processed by Philips in a Non-Adequate Country

It also applies to both manual, digital and automated types of processing of Personal Data.

Processing, within the context of these UK Controller BCR's means any one or more of the following; collection, recording, organisation, structuring, storage, adaption, alteration, retrieval, consultation, use and/or disclosure.

A list of the Group Companies bound by these UK Controller BCRs (including their contact details) can be requested at any time by sending a written request to the Privacy Legal Function and is also available at [this link](#).

## Description of Processing and Transfers

The table below describes the main purposes for which Philips Processes Personal Data as a Controller, and the categories of UK Individuals whose Personal Data Philips Processes.

<p><i>Description of the purposes of processing of Personal Data of Customers, Suppliers, Business Partners and other individuals</i></p>	<p>Personal Data of customers, Business Customers, suppliers, business partners and other individuals (such as research participants or visitors of events) may be Processed and/or transferred for purposes including but not limited to:</p> <ul style="list-style-type: none"> <li>▪ <b>Legitimate purposes as appropriate to Philips business.</b> This addresses Processing necessary for activities such as: <ul style="list-style-type: none"> <li>○ conclusion and execution of agreements with Customers, Suppliers and Business Partners;</li> <li>○ to record and financially settle delivered services, products and materials to and from Philips;</li> <li>○ marketing, sales, and promotions;</li> <li>○ account management;</li> <li>○ customer service;</li> <li>○ finance and accounting;</li> <li>○ research and development;</li> <li>○ purchasing;</li> <li>○ internal management and control;</li> <li>○ investor relations;</li> <li>○ external communications;</li> <li>○ government and legal affairs;</li> <li>○ alliances, ventures, mergers, acquisitions, and divestitures; or</li> <li>○ intellectual property and standards management;</li> </ul> </li> <li>▪ <b>Business process execution and internal management.</b> This addresses Processing necessary for activities such as managing company assets, conducting internal audits and investigations, and implementing business controls;</li> </ul>
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	<ul style="list-style-type: none"> <li>▪ <b>Health, safety and security.</b> This addresses Processing necessary for activities such as those involving safety and health, the protection of Philips and Staff assets, and the authentication of Customer, Supplier or Business Partner status and access rights;</li> <li>▪ <b>Compliance with legal obligations.</b> This addresses Processing necessary for compliance with a legal obligation to which Philips is subject; or</li> <li>▪ <b>Vital interests.</b> This addresses Processing necessary to protect a vital interest of an individual.</li> </ul> <p>The categories of personal data that may be processed for the above purposes include:</p> <p>Contact information  Marital status/identity/identification data  Professional life  Personal life  Connection data  Location data  Unique Identifiers  Financial information  Health data</p>
<p><i>Description of the purposes of Processing of Personal Data of Employees</i></p>	<p>Personal Data of Employees may be Processed and/or transferred for purposes including but not limited to:</p> <ul style="list-style-type: none"> <li>▪ <b>Human resources and personnel management.</b> This includes Processing necessary for the performance of an employment or other contract with an Employee (or to take necessary steps at the request of an Employee prior to entering into a contract), or for managing the employment-at-will relationship, e.g., management and administration of recruiting and outplacement, compensation and benefits, payments, tax issues, career and talent development, performance evaluations, training, travel and expenses, and Employee communications;</li> <li>▪ <b>Business process execution and internal management.</b> This addresses Processing necessary for activities such as scheduling work, recording time, managing company assets, conducting internal audits and investigations, implementing business controls, and managing and using Employee directories;</li> <li>▪ <b>Health, safety and security.</b> This addresses Processing necessary for activities such as those involving occupational safety and health, the protection of Philips and Employee assets, and the</li> </ul>

	<p>authentication of Employee status and access rights;</p> <ul style="list-style-type: none"> <li>▪ <b>Organizational analysis and development and management reporting.</b> This addresses Processing necessary for activities such as conducting Employee surveys, managing mergers, acquisitions and divestitures, and Processing Employee Data for management reporting and analysis;</li> <li>▪ <b>Compliance with legal obligations.</b> This addresses Processing necessary for compliance with a legal obligation to which Philips is subject; or</li> <li>▪ <b>Vital interests.</b> This addresses Processing necessary to protect a vital interest of an Employee.</li> </ul> <p>The categories of personal data that may be processed for the above purposes include:</p> <p>Marital status/identity/identification data  Professional life  Personal life  Connection data  Location data  Government Identifier (e.g. Passport, Visa, National Insurance Number)  Unique Identifiers  Economic and financial information  Images and Video  Offences, convictions, security measures  Race, ethnicity and religion,  Health data  Next of Kin</p>
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## UK Individuals' Rights, including Third-Party Beneficiary Rights

UK Individuals' rights in relation to the Personal Data Processed about them are set out in Articles 2.3, 6, 7, 9.1 (Employee Data) and 9.2 of the UK Controller BCRs. Under the conditions set out in the relevant Articles of the UK Controller BCRs and the UK GDPR, UK Individuals may have the right to obtain information, not to be subject to automated decision-making (Article 10 of the UK Controller BCRs), to access, to rectify, to erase, to restrict, to object (including to direct marketing communications), to complain, to withdraw their consent and to data portability.

### ***Claims or complaints***

UK Individuals may – at their choice – always lodge a claim or complaint to the ICO or UK courts against the Group Company being the Controller of the relevant Personal Data. Where a breach of the UK Controller BCRs is caused by a Group Company outside of the UK, Philips Electronics UK Limited will be responsible for such breaches caused by the non-UK Group Company.

UK Individuals can exercise their rights or file a complaint with Philips by sending a written request to the person or contact point indicated by Philips in the relevant privacy notice, or by contacting Philips using the [privacy contact form](#). Complaints will be handled in accordance with Article 17 of the UK Controller BCRs.

UK Individuals can file a complaint with the ICO by using its online [complaints tool](#). See also the ICO's website for more information on how to contact the ICO: <https://ico.org.uk/make-a-complaint/>.