

Ralf Bose
Chair of the Committee of European Auditor Oversight Bodies
By email only

16 June 2020

Ref: OUT2020-0060

Dear Mr Bose,

I am writing to you further to your e-mail addressed to the EDPB on 4 May 2020 regarding the topic of administrative arrangements for transfers of data being negotiated between the EU national auditor oversight bodies, members of the Committee of European Auditor Oversight Bodies (CEAOB), and the Public Company Accounting Oversight Board (PCAOB) in the United States.

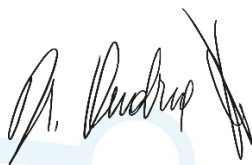
The EDPB welcomes the CEOB's efforts to address this matter in a coordinated manner by its members, with the setting up of a dedicated Taskforce in this respect and also appreciates your proposal to exchange with the CEOB on this topic.

Regarding the two draft administrative arrangements for the two Member States you refer to in your e-mail, I would like to clarify that the EDPB has been following up informally on these two files. The competent Supervisory Authorities have not yet submitted the draft administrative arrangements to the consistency mechanism, pending their finalization and the steps that need to be taken first at national level. Apart from these two draft administrative arrangements, auditor oversight authorities of other Member States will also have to align their own arrangements with the PCAOB under the GDPR or should consider the need to enter into relevant arrangements with the PCAOB. For this reason, the intervention of the CEOB as coordinator throughout this process will be needed in order to ensure the consistency of these arrangements.

The EDPB's International Transfers Subgroup (ITS) is available to hold an exchange to clarify any questions that you or your members may have regarding the EU data protection requirements related to the setting up of such administrative arrangements in light of the EDPB Guidelines 2/2020 on articles 46.2 (a) and 46.3 (b) relating to transfers of personal data between EEA and non-EEA public authorities. If the CEOB and its members deem so appropriate and that it would be beneficial for its work ahead you could invite the PCAOB to such an exchange between the CEOB and the EDPB's ITS subgroup.

I suggest that your team liaises with the ITS subgroup coordinators regarding the organization and practical arrangements of a meeting by writing at the following address: edpb-secretariat@edpb.europa.eu.

Yours sincerely,



Andrea Jelinek

Andrea Jelinek
Chair of the European Data Protection Board

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