

Dear EDPB,

Thanks for this valuable and long-awaited guide.

Could you please elaborate on the following: is there an international transfer if the importer is legally registered in a third country (e.g., the US, Delaware) but geographically established in the EU (e.g., France).

This is of particular interest for 2.3 criteria (paragraph 18). Thanks in advance!

Best,  
Vlad