

Good day!

Practitioners appreciate the approach applied by the EDPB in the Guidelines! Especially, it relates to Example 1 (Controller in a third country collects data directly from a data subject in the EU).

On the other hand, today it is almost impossible that an e-commerce company operates on a standalone basis without engaging processors.

As a result, please kindly **extend the scope of Example 1** and add your guide about cases when the Controller in the third country plans to transfer data to its processor also located in the third country.

**The main question to be answered** in this case:

Shall the Controller in the third country (who collected data directly from data subjects) apply chapter V of GDPR when transferring personal data to the processor in the third country?

Sincerely,  
Aleksandrs