



Entrust

Brexit Response Efforts FAQ

UPDATED: October 21, 2020

Below are answers to frequently asked questions about anticipated changes to Entrust's business based on the upcoming separation of the UK from the EU which will take effect on January 1, 2021 and how Entrust is planning for those changes. Presently, Entrust does not anticipate any material interruption in the supply of products, services or support to our customers in the event of a no-deal Brexit as the majority of our operations and manufacturing are outside of the UK. We are a global company with global operations, and our group of companies (including our wholly owned UK-subsidiary, nCipher) will continue to adhere, as we always have, to all applicable laws and regulations.

Please visit this page for the most up to date information as this document will be updated regularly as the situation continues to evolve.

Data Privacy

Which data protection laws will apply to Entrust and its UK-based subsidiary, nCipher, after Brexit?

While we monitor all applicable global data privacy laws, our program is built around compliance with the GDPR to ensure we comply with the most stringent data privacy regulations regardless of where we are processing personal data. Entrust utilizes the European Commission's standard contractual clauses to facilitate the cross-border transfer of personal data. The standard contractual clauses are memorialized in our standard data processing agreements with customers and vendors, including our third-party sub-processors, as well as in our Intra-Group Data Transfer Agreement, which facilitates the movement of personal data between Entrust entities.

What changes will be required for the transfer of personal data between the European Economic Area and the UK in the event of a no-deal Brexit?

Our data privacy program is built around GDPR compliance. Since the UK is poised to adopt the GDPR provisions wholesale, we do not anticipate any initial changes, but we will continue to monitor the situation.

Product Compliance (Labeling and Environmental Regulations)

Will you continue to comply with EU product compliance requirements?

Yes. Existing products will continue to be compliant with all applicable EU requirements and will be marked accordingly.

Will you comply with the new UK product compliance requirements?

Yes. Existing products with the EU CE mark as well as EU Declarations of Conformity will continue to be accepted in the UK for one more year. New products introduced to the UK market after January 1, 2021 may require the UK Conformity Assessed (UKCA) marking. Our product compliance team is aware of the potential for these new labeling requirements and will apply for the new marking as appropriate for any products Entrust sells into the UK. UK-specific Declarations of Conformity will also be issued if and when required. This information will be updated and available [here](#).

Will you need to change your CE mark authorized representative?

No. Our existing EU Declarations of Conformity specify that our authorized representative is DataCard S.A.S., located in France, so no change will be required. To the extent that the UKCA marking requires a UK-based authorized representative, this information will be updated and available [here](#).

Trade Compliance (Import, Export and Customs Regulations)

Is Entrust familiar with the EU customs formalities that will apply post-Brexit?

Yes. Note that most Entrust products are exported from the United States and Canada with the exception of the nCipher nShield® family of products, which are exported from the UK. We have a dedicated EMEA trade compliance specialist who is well-versed in EU customs formalities and, to prepare for Brexit, we have been in regular discussions with our external trade compliance consultants and customs broker to ensure continued compliance.

Do you anticipate any significant change in customs duties to products or materials shipped from the UK?

Based on our initial analysis of our nShield® products and key suppliers located in the UK, we do not anticipate that any additional, substantial duties will be imposed on these materials.

Do you anticipate longer delivery lead times for product delivery to the EU?

As advised by the UK government, there may be some delays related to export clearance from the UK and customs clearance to the EU destination country. While we are not able to predict the exact timeframe for such delays, manufactured products that are exported from the United States to the UK currently take on average up to three days to clear the export and customs process. We anticipate similar clearance timelines for the nShield® family of products originating from the UK. We are also evaluating use of our EU warehouses for additional product placement in order to move product closer to our EU partners and customers as well as supplying product from the US to the EU to provide logistics options for our partners and customers. Our primary freight forwarder employs trade compliance experts who are poised to move agilely in situations such as these and they have a physical presence in all key global locations.

Are there plans to move your UK-based manufacturing operations to the EU to enable faster shipment to EU customers?

Not at this time. We do not anticipate that Brexit will have a significant impact on product shipment to our EU customers—even for those products originating from the UK—and believe the

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measures we have already put in place as outlined above will be sufficient to ensure minimal disruption to our customers.

Product Support, Services and Supply Chain

Do you anticipate delays in terms of procuring needed materials for your products?

We are taking the necessary steps to prepare for the end of the transition period. One critical area is ensuring continuity of supply of components and material needed for our products and services. This includes, but is not limited to, pre-positioning stock ahead of January 1, 2021. We will now receive materials prior to December 31, 2020.

Do you anticipate delays in terms of providing on-site product support and/or professional services to customers?

Not at this time. We have product support and professional services colleagues located in all key locations across the globe to ensure we can quickly staff on-site support and services to customers as needed.

For more information on issues related to Brexit, customers can contact their Entrust representative or email brexit@entrust.com.

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