



European Digital Rights (EDRi) is an umbrella organisation representing 33 civil society organisations from 19 countries which defend fundamental rights online, such as data protection.

We welcome the [draft opinion](#) and believe it contains the right approach, but believe the following amendment is needed:

*1(c) to ensure that personal data can be transferred outside the Union only if the provisions on third-country transfers in EU data protection laws are complied with; ~~to negotiate on provisions which touch upon the flow of personal data only if the full application of EU data protection rules is guaranteed and respected;~~*

We suggest the deletion of this sentence, which appears to contradict recital E of the opinion, that we support:

*"E. whereas ongoing negotiations on international trade agreements, including the Trade in Services Agreement (TiSA), also touch upon international data flows while excluding privacy and data protection entirely, which will be discussed in parallel;"*