How are cross-border data transfers handled?

Short answer: Through the mechanism each jurisdiction recognizes — SDAIA-approved Standard Contractual Clauses for Saudi data, equivalent contractual safeguards elsewhere — backed by a completed Transfer Risk Assessment. Or avoided entirely, by deploying so that no data crosses a border.

The contractual route

For Saudi-origin personal data, Cyber Crucible uses SDAIA pre-approved SCCs, adopted without modification apart from required fields, integrated into customer agreements or DPAs, and extended to any onward sub-processor transfer.

Other regimes recognize comparable mechanisms — adequacy findings, standard clauses, or consent-plus-safeguards. The common requirement is that the importer is contractually bound to protections equivalent to the exporting country's law.

The Transfer Risk Assessment

Where transfer relies on safeguards such as SCCs, or involves sensitive data, a risk assessment is typically required. Cyber Crucible completed a TRA evaluating the nature of the data flows, the destination country's legal regime, the technical and organizational controls in place, and residual risks — with documented mitigations including data minimization, encryption, contractual terms, and incident handling.

The architectural route

Contractual mechanisms manage a transfer. Not transferring removes it.

- **Air-gapped on-premises** — zero outbound telemetry, so there is no transfer at all.
- **Regional staging** — infrastructure positioned to keep processing within your jurisdiction.

For regimes with localization requirements — Nigeria being the clearest example — this is often the only clean answer.

> Documentation available from **dpo@cybercrucible.com**.

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