

# Mitigating conflicts with ITAR nationality requirements



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imagination at work

# Minimizing Conflict

Stop your involvement in defense trade

Stop exporting to Canada

Stop doing anything without express permission from the government authorities in each jurisdiction involved in a transaction, even if not required

Stop doing business

Adopt practices to provide a controlled environment and not enter into a conflict wherever possible



# Mitigating Nationality Concerns: Uses of Data

Assure employees that they are protected

Provide a uniform, company-wide standard that is designed to meet or exceed local law and employee expectations

Use data only for specified, legitimate purposes, and keep only as long as necessary

Collect sensitive information only when necessary for particular task or position

Strictly limit access to this information by individual and purpose

Binding Corporate Rules as a best practice



# Request Minimum Information Necessary

- Only involve those with a clear business need to have access to ITAR data
- Protect the data through technology/security measures
- Ask for the information you must have for compliance
  - ITAR 124.16 dual citizen and third-country nationals from NATO, EU, Australia, New Zealand, Japan & Switzerland
  - Are you a dual citizen/third-country national limited to 124.16 countries?
  - Canadian Government projects: respect for Canadian security clearance process for DND, CSE, CSA & NRC employees with a minimum of “secret” clearance



Expectations: See State Agreement Guidelines  
<http://www.pmddtc.state.gov/licensing/agreement.html>