

# Covered Data Transaction

Transaction  
that involves  
any type of  
**Access**

Countries of  
Concern or  
**Covered Person**

## Covered Data Transaction

Any transaction that involves any access by a country of concern or covered person to any government-related data or bulk U.S. sensitive personal data and that involves: (1) Data brokerage; (2) A vendor agreement; (3) An employment agreement; or (4) An investment agreement.

**Government-related  
Data or Bulk U.S.  
Sensitive Personal  
Data**

**Data brokerage,  
Vendor Agreement,  
Employee Agreement,  
or Investment  
Agreement**