
Appendix 4 to Atos Group Binding Corporate Rules as a Controller –
Complaint Handling Procedure where Atos is acting as a Controller

Author: Group Data Protection Office
Version: 1.0
Document date: November 2024
Doc. No:

Contents

Complaint Handling Procedure	3
Data Subject Complaint Handling (Atos as a Controller)	3
Procedure for Data Subjects' Complaints where Atos acts as a Controller	3
STEP 1: Data Subject complains to the Atos Local Data Protection Office	3
Submitting the complaint.....	3
1. Content of the claim	3
STEP 2: Local Data Protection Office response	3
Responding to the complaint	3
1. Acknowledgement of receipt	3
2. Analysis of the complaint.....	4
STEP 3: Escalation to the Local Data Protection Authority or to a similar Supervisory Authority in the Country of location of the Data Subject	4
Annex 5-1: Complaint form for Data Subjects against Atos (acting as Controller)	5
Annex 5-2: Standard Acknowledgment of Receipt of Complaint (acting as Controller)	7

Complaint Handling Procedure

Data Subject Complaint Handling (Atos as a Controller)

Procedure for Data Subjects' Complaints where Atos acts as a Controller

Where a Data Subject believes that his/her rights under Atos Group BCR-C (where Atos is acting as a Controller), or according to the EU GDPR or under local applicable law, have been violated, or that his/her request to exercise his/her right(s) has been denied, a Data Subject can enforce his/her rights against Atos by following the procedure set out in this Appendix and by completing the attached form.

Note: While Atos wishes to deal with complaints via this procedure, Data subjects also have a right to complain to the Local Data Protection Authority or any similar Supervisory Authority in his/her country of location or bring a claim before a Local relevant court in his/her country of location without first exhausting this complaints process.

STEP 1: Data Subject complains to the Atos Local Data Protection Office

Submitting the complaint

Data Subjects shall first file their request regarding the exercise of their rights to the Atos Local Data Protection Office at the relevant address that appears in **Appendix 10**.

1. Content of the claim

This request shall be made by using the attached form (Annex 1) and by submitting the following information:

- ▶ Name of the data subject;
- ▶ Copies of documents which confirm the identity of the data subject;
- ▶ Contact details where the response shall be addressed to;
- ▶ Name of the Atos entity which has initially collected the personal data;
- ▶ Approximate date of collection of the personal data;
- ▶ Type of personal data and processing purpose about which the data subject is complaining;
- ▶ Details regarding the claim, including the nature of any breach and the identity, if known, of any specific Atos Entity that the complaint concerns.

Data subjects should make their claim as precise as possible in order to enable the Local Data Protection Office to handle the case within a reasonable period of time as defined in Step 2 of this Appendix 5.

STEP 2: Local Data Protection Office response

Responding to the complaint

1. Acknowledgement of receipt

The Local Data Protection Office shall acknowledge receipt of the complaint no later than **one (1) week** after the complaint was received. The standard acknowledgement of receipt attached to this Appendix 5 (see Annex 2) can be used by the Local Data Protection Office.

2. Analysis of the complaint

2.1. Request from Atos Local Data Protection Office for additional information

Where the information provided by Data Subjects is not sufficient for the Local Data Protection Office (acting reasonably) to handle the case, the latter shall address a request for additional information to the Data Subject no later than **fifteen (15) days** after receipt of acknowledgement was sent.

2.2. Response to the complaint

Where the information provided by Data Subjects is sufficient for the Local Data Protection Office, or once the additional information requested in the previous paragraph are provided by the Data Subject, the Local Data Protection Office shall deal with the complaint without undue delay and in any event within **one (1) month** of receipt. Taking into account the complexity and number of the requests, that period may be extended by two further months at the utmost, in which case the data subject will be informed accordingly.

The answer to the claim made by the data subject shall be as clear as possible and shall be drafted in a manner which is easily understandable by data subjects.

STEP 3: Escalation to the Local Data Protection Authority or to a similar Supervisory Authority in the Country of location of the Data Subject

Where Steps 1 to 2 have not enabled Data Subjects to get a satisfying answer or in case a complaint is finally rejected by the Local Data Protection Office, Data Subjects must be informed of the rationale leading to this decision and of their right to complain to the Local Data Protection Authority or to a similar Supervisory Authority in his/her Country or to bring a claim before a Local relevant court in his/her country of location.

Annex 5-1: Complaint form for Data Subjects against Atos (acting as Controller)

THE STANDARD LETTER FORM BELOW MAY BE USED BY DATA SUBJECTS WHO INTEND TO BRING A COMPLAINT AGAINST ATOS. PLEASE NOTE THAT THIS FORM SHALL BE FILLED IN WITH RELEVANT INFORMATION.

This is only a template that may be used freely by Data Subjects – a complaint received in another format will also be studied according to the procedure described above.

* *

*

Dear Local Data Protection Contact,

I, _____ [indicate name and surname], hereby file a complaint regarding the processing of my personal data for which you are currently acting as a Controller.

Please find below, the information relating to my complaint, which I would be grateful if you could handle appropriately.

I acknowledge that the complaint procedure is time framed according to Appendix 4 of the Atos Group BCR-C and is deemed to have started as of _____ [indicate time where complaint is filed].

Please find also attached copies of documents which should serve to prove my identity.

Data Subject's name and surname	
Data Subject is:	<input type="checkbox"/> An Atos Employee or Candidate <input type="checkbox"/> A candidate for an Atos job <input type="checkbox"/> An active Atos employee <input type="checkbox"/> A former Atos employee who is no longer employed by an Atos Group company <input type="checkbox"/> An Atos Customer's employee <input type="checkbox"/> An active employee of an Atos Customer <input type="checkbox"/> A former employee of an Atos Customer <input type="checkbox"/> An Atos Provider or an Atos Provider's employee <input type="checkbox"/> A candidate for a Provider job <input type="checkbox"/> An active Provider Employee <input type="checkbox"/> A former employee of an Atos Provider <input type="checkbox"/> A Guest at an Atos event <input type="checkbox"/> An Atos website visitor <input type="checkbox"/> Other: Please specify in the box below
Data Subject is Other	
<i>Employee DAS ID (only if active or former Atos employee)</i>	
<i>RBU / Practice / Legal employing entity (only if active or former Atos employee)</i>	
Date of this complaint	

Preferred contact details (email/ phone number)	
Approximate date when data were initially collected	
List of personal Data concerned by the complaint	
Description of the Complaint - Please give details regarding the right you wish to exercise, the category of processing activity at stake and, if relevant, the reason why you believe that such processing is illegitimate	

Annex 5-2: Standard Acknowledgment of Receipt of Complaint (acting as Controller)

Dear Data Subject,

We hereby acknowledge receipt of the complaint you have filed on _____ [indicate date complaint was sent by Data Subject] and that we received on _____ [indicate date complaint was received by Local Data Protection Office].

We will handle your complaint according to the Procedure and the time frame set out in Appendix 4 of Atos Group BCR-C, Atos acting as a Controller.

In the meantime, we remain at your entire disposal to discuss this further.

Kind regards,

The Local Data Protection Office