
Appendix 9 to Atos Group Binding Corporate Rules as a Controller - Responsibility Assignment Matrix: RACI

Author:	Group Data Protection Office
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RACI: R: Responsible A: Accountable C: Consulted I: Informed

Below tables detail which roles have to execute what data protection related tasks

Activity	Group Data Protection Office	Local DPLE	Local DPO
ADOPTION OF THE BCR FOR THE ENTITIES (Process used for the initial adoption of the BCR)			
Adopt an Intra-Group Agreement between Atos parent company and Atos entities regarding the bindingness of the BCR	A/R	C (regarding the content of the IGA) / R (regarding the signature of the IGA)	R
For each BCR new member, determine whether or not a Local Board Decision is necessary	C	A/R	IC
If yes: Present to the Local Board to request validation by the Board	C	A/R	IC

Activity	Group Data Protection Office	Local DPLE	Local DPO	New legal entity rep's
ACCEPTATION OF BCR FOR THE SUBSEQUENT ENTITIES				
Identify legal entity to sign BCR	A	C	I	R
Assess compliance to documented BCR criteria	I	C	C	A/R
Evaluate assessment (Formal meeting)	A	R	R	R
For each BCR new member, determine whether or not a Local Board Decision is necessary	C	A/R	IC	C
if yes: Present to the Local Board to request validation by the Board	C	A/R	IC	C

Activity	Group Data Protection Office	Local DPLE	Local DPO	New legal entity rep's
If accepted: sign-off IGA	A/R	R	I	R
Publish new member (adding to repository & adding to BCR-appendix)	A/R	I	I	I
Coordinate BCR-sign up activities	A/R	R	R	C

Activity	Group Data Protection Office	Local DPLE	Local DPO	Local HR
MAKING BCR BINDING AMONGST EMPLOYEES				
Translate BCR into local language when required by Local law	I	A	A	R
Determine the local requirements regarding Work Councils	I	C	C	A/R
Where necessary, prepare communication pack for Work Councils presentation	I	C	C	A/R
Where necessary, needed: set up date and present to Workers Councils	I	C	C	A/R
Communicate broadly to all Employees the requirements of the BCR-rules (via mailing or through appropriate local communication channel)	A (for effective Communication at global level) / R (for drafting the communication)	C (for effective communication at local level)	R (for effective Communication at local level)	

Activity	Group Data Protection Office	RBU DPLE	RBU DPO	Local DPLE	Local DPO	Line management
TRAINING						
Identify training needs	A/R	R (for the relevant scope)	R (for the relevant scope)	R (for the relevant scope)	R (for the relevant scope)	R (for the relevant scope)
Prepare the Global & General training	A/R (Design trainings (mandatory & dedicated))	C	C	C	C	I
Make DP training available for DP Community	A/R	C	R	C	C	
Train local DPOs and DPLEs	A/R	R	R	C	C	
Update DP training with local specificities, including translation (e.g. establish legal training content for local needs)	I	C	R	C (as a DPO team)	A (as a DPO team) /R	
Ensure DP training is effectively followed by Employees at local level (Roll-out mandatory and dedicated trainings)	C	I	C	I	C	A/R
Deliver classroom training when needed	A/R (for the relevant scope)	C (for the relevant scope)	A/R (for the relevant scope)	C (for the relevant scope)	A/R (for the relevant scope)	I

Activity	Group Data Protection Office	RBU DPLE	RBU DPO	Local DPLE	Local DPO	Business/HR
HANDLING DATA SUBJECT REQUESTS OR COMPLAINTS WHEN ATOS ACTS AS CONTROLLER						
Receive data subject requests or complaints	C	I	I	C	A/R	I
Send receipt/ acknowledgement of the data subject request or complaint in due time & check identity	C	I	I	C	A/R	I
Analyze the data subject request or complaint	C	C	C	R	R	A/R
Resolve the data subject request or complaint	I	I	I	R	R	A/R

Activity	Group Data Protection Office	RBU DPLE	RBU DPO	LOCAL DPLE	LOCAL DPO	Formal DP-contact	Business
HANDLING A REQUEST FROM THE GROUP LEAD DATA PROTECTION AUTHORITY							
Receive request	C	I	I	I	I	A/R	
Acknowledge request in a timely fashion	C	I	I	I	I	A/R	I (if concerned)
Analyze request	C	I	I	I	I	A/R	R (if concerned)
Answer request	C	I	I	I	I	A/R	
Follow up request	C	I	I	I	I	A/R	C (if concerned)

Activity	Group Data Protection Office	RBU DPLE	RBU DPO	Local DPLE	Local DPO	Formal DP-contact	Business
HANDLING OF LOCAL DATA PROTECTION AUTHORITY'S REQUESTS							
Receive request	I	I	I	I	I	A/R	I (if concerned)
Acknowledge request in a timely fashion	I			I	I	A/R	I (if concerned)
Analyze the request	I	I	I	C	C	A/R	R (if concerned)
Answer the request	I	I	I	I	C	A/R	
Follow up the request	I	I	I	I	C	A/R	C (if concerned)

Activity	Group Data Protection Office	RBU DPLE	RBU DPO	LOCAL DPLE	LOCAL DPO	Formal DP contact
GENERAL NOTIFICATION/AUTHORIZATION REQUEST TO A DATA PROTECTION AUTHORITY						
Complete necessary local formalities with Data Protection Authorities	I	I	I	C	C	A/R
Monitor such requests/formalities	I	I	I	C	C	A/R
Where necessary consult Group lead data protection authority	C	I	I	C	C	A/R
Where necessary consult local data protection authority	I	I	I	C	C	A/R
First response to local DP related events: identify legal obligations (notifications, etc.)	I	A (as a RBU DPO team) /R	A (as a RBU DPO team) /R	R	R	

Activity	Group Data Protection Office	RBU DPLE	RBU DPO	LOCAL DPLE	LOCAL DPO	Security team	Formal DP Contact	Business
DATA BREACH NOTIFICATION TO A DATA PROTECTION AUTHORITY								
Complete Data Breach Notification Template of Data Protection Authority	C	C	C	A	R	R	R	R
Review Data Breach Notification	R	R	R	A	R		R	
Transmit the Data Breach Notification to the relevant DPA and handle follow-up steps	C	C	C	A	C		R	I
DATA BREACH NOTIFICATION TO DATA SUBJECTS								
Compose Data Breach Notification	C	C	C	A	C		I	R
Review Data Breach Notification	C	C	C	A/R	R		I	I
Transmit the Data Breach Notification to the relevant Data Subjects	C	C	C	A	C		I	R

Activity	Group Data Protection Office	RBU DPLE	RBU DPO	LOCAL DPLE	LOCAL DPO	Global Procurement	Group Security Officer	Supplier Contract Lawyer
DATA PROTECTION CLAUSES IN GLOBAL SUPPLIER CONTRACTS								
Ensure that the Data Protection Clauses are part of any Contract where personal data is processed						A/R		
Review DP clauses in major contracts	C					C		A/R
Prepare Data Protection Addendum	C					A/R		C
Review and approve the security appendices	C (if needed)					A/R	C (if needed)	I
Get Data Protection Addendum signed	I					A/R		C

Activity	Group Data Protection Office	RBU DPLE	RBU DPO	LOCAL DPLE	LOCAL DPO	Business	Local procurement
DATA PROTECTION CLAUSES IN LOCAL SUPPLIER CONTRACTS BOTH FOR CLIENT CONTRACTS AND ATOS PROCESSING (Atos is processor or controller)							
Ensure that Data Protection Clauses are part of all Contracts where personal data is processed				C		R	A/R
Review DP clauses in major contracts	I	I/C	I	C	C	I	AR
Review DP clauses in other contracts	I	I/C	I	C	C	I	AR
Prepare Data Protection Addendum in major contracts	C	C		C	I	C	A/R
Prepare Data Protection Addendum in other contracts	C	C		C	I	C	A/R
Get Data Protection Addendum signed				I	I	I	A/R
Review and approve the security appendices			C	I	C	A/R (jointly with Security Officer)	

Activity	Group Data Protection Office	RBU DPLE	RBU DPO	LOCAL DPLE	LOCAL DPO	Business Owner
COMPLIANCE ASSESSMENT OF DATA PROCESSING AS CONTROLLER AT GLOBAL LEVEL IN MYCADP-TOOL						
Complete the CADP-C	C	I	I	I	I	A/R
Submit the CADP-C for GDPO review	I	I	I	I	I	A/R
Review the CADP as Controller (CADP-C)	A/R	R	R	I	I	R
Consider & implement corrective measures, if required and re-submit	I	I				A/R
Monitor ongoing compliance & keep record up to date	C (where needed)					A/R

Activity	Group Data Protection Office	RBU DPLE	RBU DPO	LOCAL DPLE	LOCAL DPO	Business Owner
COMPLIANCE ASSESSMENT OF DATA PROCESSING AS CONTROLLER AT LOCAL LEVEL IN MYCADP-TOOL						
Complete the CADP-C	I	I	I	C	C	A/R
Submit the CADP-C for Local Review	I	I	I	I	I	A/R
Review the CADP-C	I	I	I	C	A/R	R
Consider & Implement corrective measures, if required and re-submit	I			I	I	A/R
Monitor ongoing compliance & keep record up-to-date				C (where needed)	C (where needed)	A/R