
Appendix 1 to Atos Group Binding Corporate Rules as a Processor

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Organization of the Data Protection Community and Roles

Data Protection Organization Principles

Reflect operating model

- Provide data protection support for Group and Local management
- Maintain data protection expertise per Business Unit/Support Function

Adhere to jurisdictions

- Comply with legal obligations regarding appointment of data protection officers
- Maintain necessary link to local legislation and Data Protection / Supervisory Authorities
- Support regional / country cluster organization in the business

Allow evolutive approach

- Adapt role of Atos data protection specialists according to organizational and business development of the Group (iterative approach)

Data Protection Management Principles

Stay active

Data Protection is not a one-shot activity that required our attention, it is an ongoing endeavor. Atos needs a sound and stable data protection organization in order to be able to comply with its obligations and to be able to evidence that it does so (Accountability).

Adhere to the rules

Even if some units might feel remote from GDPR as they are not within the territorial scope of the law, Atos Binding Corporate Rules oblige all signing legal entities to adhere to the data protection principles and provisions set out in the Group Data Protection Policy and the Group Binding Corporate Rules. All units in Atos need to adhere to the Policy and to the BCR as well as to any locally applicable legislation.

Fill potential gaps

Entities need to assign colleagues to vacant DP roles/positions in order to ensure an effective data protection organization and a functioning data protection management system, as commonly required by data protection laws.

Allow for the means

Even in times of limited budgets, Data Protection obligations still remain, and possible fines as defined in GDPR threaten organizations who do not sufficiently care about protecting personal data. Hence data protection experts need sufficient means to fulfil their tasks. This includes realistic time allocation, tools that support the work, the necessary means for maintaining knowledge and expertise.

Group Data Protection Organization

- ▶ Cascaded organization covering the company matrix
- ▶ Two main role types: operational focus and legal focus
- ▶ Address local / national requirements as well as Group compliance requirements



The Atos DP Community is coordinated by the Group Data Protection Office (GDPO) which is led by the Group Chief Data Protection Officer. The GDPO includes legal data protection specialists and experienced practitioners. These individuals represent Atos at the group level.

The Group Chief Data Protection Officer reports directly to a member of the Atos Group Board and enjoys the highest management support for the fulfilling of this task. Moreover, the Group Chief Data Protection Officer can inform the highest management level if any question or matter arise during the performance of his/her duties.

In any case, the members of the Atos DP Community, when performing their duties as a Data Protection Officer, should not have any tasks that could result in conflict of interests.

At the local level, Local Data Protection Legal Experts and Local Data Protection Officers, both together form the Local Data Protection Office.