
Appendix 1 to Atos Group Binding Corporate Rules

Author: Group Data Protection Office
Version: 3.0
Document date: May 2022
Doc. No:

Contents

Organization of the Data Protection Community and Roles..... 3

Organization of the Data Protection Community and Roles

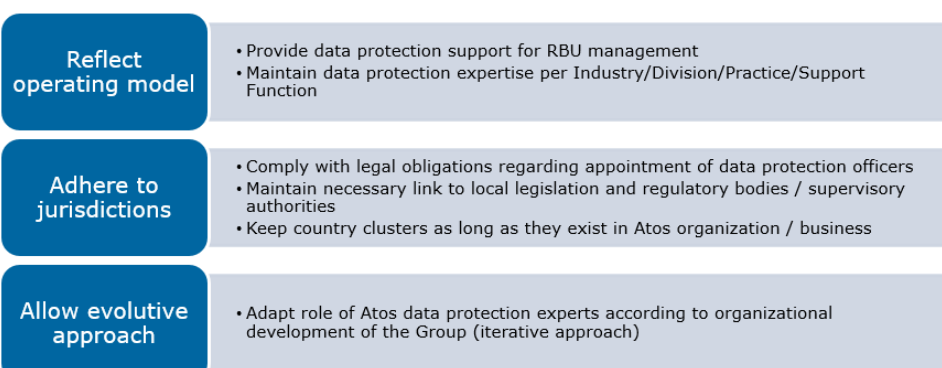
Organization:

Atos Data Protection Organization

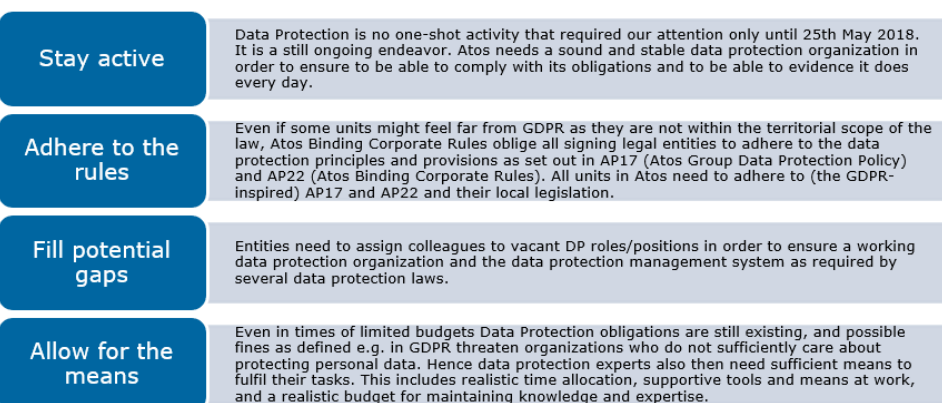
- ▶ Cascading organization covering the company matrix
- ▶ Two main role types: operational focus and legal focus
- ▶ As data protection is regulated by (national) laws still addressing country level / jurisdiction



Data Protection Organization Principles (1/2)



Data Protection Organization Principles (2/2)



Roles:

Role description CDGO¹⁾ / GDPO²⁾

¹⁾ Group Chief Data Governance Officer
²⁾ Group Data Protection Officer

Mission		
<p>Group Chief Data Governance Officer / Group Data Protection Officer globally managing Data Protection Compliance, supporting data protection for all Atos, monitoring the implementation of data protection policies and processes, guiding Atos DP Community, defining Atos DP strategy and organization as well as communication and training</p>		
Main responsibilities		
<ul style="list-style-type: none"> Strategy <ul style="list-style-type: none"> Define Atos Data Protection strategy Define or support defining actions to implement Design, draft, review and roll out policies and processes Monitor implementation of strategy Support <ul style="list-style-type: none"> Design and roll-out practical operational tools to support DP compliance Review Compliance Assessments of Data Processing (CADP-C) on global level Assist operations in designing processes & systems Support MBA activities and negotiation of agreements (limited to exceptional cases) Data Protection organization <ul style="list-style-type: none"> Coordinate and manage Group DP Organization – setup and maintain Atos DP Community Support setup and maintenance of operational organization incl. designation of DPLEs & DPOs with Legal & Security Management Define roles of DP experts (DPOs, DPCs, DDPEs, DPLEs) Support DP Organization towards operations Review Data Protection and Privacy Organization aspects (audits) Event/incident management <ul style="list-style-type: none"> Support Security organization in case of Personal Data Breach and events/incidents related to Data Protection Monitor global DP related events/incidents: follow up on security measures and remediation actions Provide support for local & regional DP related events Awareness <ul style="list-style-type: none"> Manage global Data Protection communication and events (e.g. Data Protection Day) incl. communication tools (SharePoint, ESN) Support local & regional Data Protection communication and events Create global information & communication campaigns Participate to client & external communication events Setup & maintain of global DP-info portal Training <ul style="list-style-type: none"> Identify training needs Design and roll-out trainings Train DP experts (DPOs, DPCs, DDPEs, DPLEs) and stakeholders Reporting <ul style="list-style-type: none"> Condense reporting & create Data Protection Reports Contribute to CSR reporting 		
Interface	Objectives	Performance tracking
<p>Direct report to -> Deputy General Legal Counsel</p> <p>Functional report to -> NA</p> <p>Additional report to -> NA</p>	<ul style="list-style-type: none"> Driving and monitoring DP-related activities in Atos group Act as consultant and counterpart for Atos management regarding DP related topics Driving and monitoring the Atos DP Board 	<ul style="list-style-type: none"> Relevant KPI/KGI in DP for Atos group Coverage / partial validation of CADP-C Documenting Atos-DP activities

Role description RBU DPO¹⁾

¹⁾ RBU Data Protection Officer
²⁾ Register of Processing Activities

Mission		
<p>RBU Data Protection Officer monitoring and condensing DP on RBU level, supporting data protection topics in his/her perimeter, monitoring the implementation of data protection organization, guiding local, GDC/country-cluster DPOs, act as counterpart at least for one Industry, taking active role in defining Atos DP strategy and organization as well as communication and training</p>		
Main responsibilities		
<ul style="list-style-type: none"> Strategy <ul style="list-style-type: none"> Support defining, actions to implement and implementing Atos Data Protection strategy Support drafting, review and roll-out of policies: practical & security aspects Report & raise potential issues within RBU security organization, share status and planning with Atos GDPO Support <ul style="list-style-type: none"> Monitor implementation of Atos Data Protection and Privacy Organization (incl. relevant policies) in RBU operations Review Compliance Assessments of Data Processing (CADP-C) on RBU level Support security reviews of RBU Compliance Assessments of Data Processing (CADP-C) Data Protection organization <ul style="list-style-type: none"> Coordinate implementation of DP Organization for RBU with DPLEs and DPOs Coordinate setup and maintenance of operational organization (e.g. records of processing activities, CADP-Cs, notifications, DPIA, data breach response) in RBU Be point of contact for DPCs/Local DPOs/DDPEs on Data Protection and Privacy Organization aspects and for operations regarding data protection matters on GDC/country-cluster level Act as counterpart at least one Industry regarding data protection matters, closely collaborating with the Industry DPC Review Data Protection and Privacy Organization aspects (audits) for RBU Event/incident management <ul style="list-style-type: none"> Support Security organization in case of Personal Data Breach and events/incidents related to Data Protection Monitor regional DP related events/incidents: follow up on security measures and remediation actions Identify Data Protection related security measures to be implemented in RBU - follow up on Data Protection related security measures & actions Awareness <ul style="list-style-type: none"> Organize and contribute to Data Protection communication and events (e.g. Data Protection Day) on regional level, contribute to global Data Protection communication and events Relay global & launch local information & communication campaigns Training <ul style="list-style-type: none"> Identify training needs within RBU and assigned Industry Support Atos GDPO in identifying global training needs and designing & rolling-out trainings Support & roll-out trainings (mandatory & dedicated); participate in Atos GDPO trainings & train Local DPOs, DPCs, DDPEs, DPLEs and teams Reporting <ul style="list-style-type: none"> Report status, KGI/KPI, communication actions, significant events/incidents, potential issues and DP organization status to GDPO Contribute to annual data protection report and CSR reporting 		
Interface	Objectives	Performance tracking
<p>Direct report to -> RBU Head</p> <p>Functional report to -> Group DPO</p> <p>Additional report to -> NA</p>	<ul style="list-style-type: none"> Driving and monitoring DP-related activities in RBU Act as consultant and counterpart for RBU management regarding DP Driving and monitoring Data Protection at least for one Industry Permanent member of the Atos DP Board 	<ul style="list-style-type: none"> Relevant KPI/KGI in DP for RBU and Industry Coverage / validation of CADP-C in RBU and Industry Coverage of CADP-P (RPA?) n RBU and Industry Documenting RBU/Industry DP activities

Role description GDC/country-cluster DPO¹⁾

¹⁾ GDC/country-cluster Data Protection Officer

Mission		
<p>Data Protection Officer in respective GDC/country-cluster managing and supporting DP activities in his/her perimeter, supporting data protection topics in his/her perimeter, supporting and implementing data protection organization, guiding local DPOs, managing GDC/country-cluster Data Protection Office, supporting implementation of DP strategy as well as communication and training</p>		
Main responsibilities		
<ul style="list-style-type: none"> Strategy <ul style="list-style-type: none"> Support implementing Atos Data Protection strategy Support drafting, review and roll-out of policies: practical & security aspects Report & raise potential issues within GDC/country-cluster security organization, share status and planning with RBU DPO Support <ul style="list-style-type: none"> Support implementation of Atos Data Protection and Privacy Organization (incl. relevant policies) in operations on GDC/country-cluster level Review Compliance Assessments of Data Processing (CADP-C) within GDC/country-cluster Support security reviews of local (GDC/country-cluster) Compliance Assessments of Data Processing (CADP-C) Support handling subject access requests and complaints related to Data Protection Data Protection organization <ul style="list-style-type: none"> Support implementation of DP Organization for GDC/country-cluster with DPLE Support setup and maintenance of operational organization (e.g. records of processing activities, CADPs, notifications, DPIA, data breach response) in GDC/country-cluster Be point of contact for DPCs/Local DPOs/DDPEs on Data Protection and Privacy Organization aspects and for operations on local data protection matters Support review of Data Protection and Privacy Organization aspects (audits) for GDC/country-cluster Event/incident management <ul style="list-style-type: none"> Support Security organization in case of Personal Data Breach and events/incidents related to Data Protection Monitor regional & local DP related events/incidents: follow up on security measures and remediation actions Identify Data Protection related security measures to be implemented in GDC/country-cluster - follow up on Data Protection related security measures & actions Awareness <ul style="list-style-type: none"> Contribute to Data Protection communication and organizing of local events (e.g. Data Protection Day) Relay global & launch local information & communication campaigns Training <ul style="list-style-type: none"> Support RBU DPO to identify training needs within GDC/country-cluster Support & roll-out trainings (mandatory & dedicated); participate in Atos GDPO trainings & support training Local DPOs, DPCs, DDPEs, DPLEs and teams Reporting <ul style="list-style-type: none"> Report status, KGI/KPI, communication actions, significant events/incidents, potential issues and DP organization status to RBU DPO 		
Interface	Objectives	Performance tracking
<p>Direct report to -> GDC/country-cluster Head</p> <p>Functional report to -> RBU DPO</p> <p>Additional report to -> NA</p>	<ul style="list-style-type: none"> Driving and monitoring DP-related activities in GDC/country-cluster Act as consultant and counterpart for GDC/country-cluster management regarding DP May become member of the Atos DP Board (individual appointment) 	<ul style="list-style-type: none"> Relevant KPI/KGI in DP for GDC/country-cluster Coverage / validation of CADP-C in GDC/country-cluster Coverage of CADP-P in GDC/country-cluster Documenting GDC/country-cluster DP activities

Role description local DPO¹⁾

¹⁾ local Data Protection Officer

Mission		
<p>Local Data Protection Officer performing 2nd level of defense tasks of a (designated) DPO, supporting data protection topics in his/her perimeter/ country, supporting and implementing data protection organization, managing local Data Protection Office, supporting implementation of DP strategy as well as communication and training</p>		
Main responsibilities		
<ul style="list-style-type: none"> Strategy <ul style="list-style-type: none"> Support implementing Atos Data Protection strategy Support review and roll-out of policies: practical & security aspects Report & raise potential issues local security organization, share status and planning with GBU/country-cluster DPO Support <ul style="list-style-type: none"> Support local implementation of Atos Data Protection and Privacy Organization (incl. relevant policies) in operations Review local Compliance Assessments of Data Processing (CADP-C) Support security reviews of local Compliance Assessments of Data Processing (CADP-C) Support reviews of bids/Rainbow-reviews Handle subject access requests and complaints related to Data Protection in local perimeter Act as SPOC for local Supervisory authorities Data Protection organization <ul style="list-style-type: none"> Support local implementation of DP Organization with DPLE Perform DPO tasks as described in AP17 / applicable local DP legislation (e.g. GDPR), covering e.g. records of processing activities, assessments / CADP-Cs / DPIA, notifications, data breach response Be point of contact for DPCs/DDPEs on Data Protection and Privacy Organization aspects and for operations on local data protection matters Event/incident management <ul style="list-style-type: none"> Support Security organization in case of Personal Data Breach and events/incidents related to Data Protection Monitor regional & local DP related events/incidents: follow up on security measures and remediation actions Identify Data Protection related security measures to be implemented on local level - follow up on Data Protection related security measures & actions Awareness <ul style="list-style-type: none"> Contribute to Data Protection communication and organizing of local events (e.g. Data Protection Day) Relay global & launch local information & communication campaigns Training <ul style="list-style-type: none"> Support country-cluster DPO to identify local training needs Support & roll-out trainings (mandatory & dedicated); participate in Atos GDPO trainings & support training DPCs, DDPEs and teams Reporting <ul style="list-style-type: none"> Report status, KGI/KPI, communication actions, significant events/incidents, potential issues and DP organization status to country-cluster DPO 		
Interface	Objectives	Performance tracking
<p>Direct report to -> local management</p> <p>Functional report to -> country-cluster DPO</p> <p>Additional report to -> NA</p>	<ul style="list-style-type: none"> Supporting local DP-related operational activities Performing local DP-related 2nd level of defense activities Act as consultant and counterpart for local management regarding DP May become member of the Atos DP Board (individual appointment) 	<ul style="list-style-type: none"> Relevant KPI/KGI in DP for local perimeter Coverage / validation of CADP-C for local perimeter Coverage of CADP-P for local perimeter (Rainbow delivery) Documenting local DP activities

Role description DDPE/IDPE/PDPE¹⁾

¹⁾ Division, Industry or Practice Data Protection Expert

Mission		
<p>Customer Processing: Maintaining the Repository of Processing Activities for existing projects and services (Compliance Assessment), by validation of CADP-Ps, by supporting bid teams in RPA and CADP-P process (where DDPE/IDPE/PDPE is assigned he/she takes over this mission on behalf of the DPO in his/her perimeter.)</p>		
Main responsibilities		
<ul style="list-style-type: none"> SPOC for Data Protection questions and processes relating to the customer bids, contracts, services and RFPs for his/her Division/Industry/Practice Maintaining existing Practice projects and services (RPA) Supporting PM/CM/SDM in creating/updating Division/Industry/Practice projects Maintaining and quality check of the Repository of Processing Activities for existing/new projects and services Supporting Bid Manager in creating CADP-P including Follow-Up (e.g., Risk Letter) Validation of CADP-P (Rainbow bidding) Consult and support the PM/CM/CP/SDM in all Data Protection related topics including changes of services (e.g., change of delivery location; usage of Cloud solutions) Check existence of internal and external SubCo agreements (incl. CADP-S) Regular status reporting to Division/Industry/Practice Board and DPO Support Customer audits and external or internal audits regarding data protection questions Continuous education in GDPR topics Set up of trainings (if needed) for Division/Industry/Practice Support RBU DPO in own Division/Industry/Practice 		
Interface	Objectives	Performance tracking
<p>Direct report to -> (local) Division/Industry/Practice Head</p> <p>Functional report to -> (local) DPO</p> <p>Additional report to -> (local) Security</p>	<ul style="list-style-type: none"> Ensure Division/Industry/Practice Compliance Assessment Processes are set up and rolled out in new projects/services Compliance of the Division/Industry/Practice RPA register 	<ul style="list-style-type: none"> Coverage of relevant projects and services in Division/Industry/Practice Coverage of CADP-P/ RPA (Rainbow bidding)

Role description DPC¹⁾

¹⁾ Data Protection Coordinator (formerly addressed as DP-POC / DP Point of Contact)

Mission		
<p>Data Protection Coordinator acting as the DP expert within his Division, Practice, Operation or Support Function, acting as the DP point of contact in his / her perimeter, supporting data protection topics, supporting implementation of data protection organization, supporting implementation of DP strategy as well as communication and training</p>		
Main responsibilities		
<ul style="list-style-type: none"> Strategy <ul style="list-style-type: none"> Support definition and implementation of Atos Data Protection strategy in his/her area of expertise Support drafting, review and roll-out of policies: practical & security aspects in his/her area of expertise Report & raise potential issues within own organization, share status and planning with GDPO Support <ul style="list-style-type: none"> Support implementation of Atos Data Protection and Privacy Organization (incl. relevant policies) in Division, Practice, Operation or Support Function Review Compliance Assessments of Data Processing (CADP) if limited to Division, Practice, Operation or Support Function Support security reviews of local Compliance Assessments of Data Processing (CADP) Support subject access requests and complaints related to Data Protection in his/her perimeter Data Protection organization <ul style="list-style-type: none"> Support implementation of DP Organization with DPLEs Support setup and maintenance of operational organization (e.g., records of processing activities, CADPs, notifications, DPIA, data breach response) in his/her perimeter Be point of contact for Local DPOs/DOPEs on Data Protection and Privacy Organization aspects and for operations on data protection matters within Division, Practice, Operation or Support Function Event/incident management <ul style="list-style-type: none"> Support Security organization in case of Personal Data Breach and events/incidents related to Data Protection in own perimeter Monitor DP related events/incidents in own perimeter: follow up on security measures and remediation actions Identify Data Protection related security measures to be implemented in own perimeter - follow up on Data Protection related security measures & actions Awareness <ul style="list-style-type: none"> Contribute to Data Protection communication and organizing of events (e.g., Data Protection Day) Relay global & launch Division, Practice, Operation or Support Function-specific information & communication campaigns Training <ul style="list-style-type: none"> Support GDPO to identify local training needs Support & roll-out trainings (mandatory & dedicated); participate in Atos GDPO trainings & support training DOPEs and teams Reporting <ul style="list-style-type: none"> Report status, KGI/KPI, communication actions, significant events/incidents, potential issues and DP organization status to GDPO 		
Interface	Objectives	Performance tracking
<p>Direct report to -> Division, Practice, Operation or Support Function management</p> <p>Functional report to -> GDPO</p>	<ul style="list-style-type: none"> Supporting DP-related operational activities in own unit Performing DP-related 2nd level of defense activities if limited to own unit Act as consultant and counterpart for management regarding DP May become member of the Atos DP Board (individual appointment) 	<ul style="list-style-type: none"> Relevant KPI/KGI in DP for own perimeter Coverage / validation of CADP-C for own perimeter Coverage of CADP-P for own perimeter Documenting DP activities within Division, Practice, Operation or Support Function

Role description RBU/CC¹/GDC DPLE²)

¹) Country-cluster

²) Data Protection Legal Expert

Mission		
RBU/GBU/CC¹/GDC Data Protection Legal Expert , supporting legal perspective of data protection topics in his/her perimeter, supporting and implementing data protection organization, supporting contracts and negotiations regarding data protection in his/her perimeter, supporting RBU/GBU/CC ¹ /GDC Data Protection Office, supporting implementation of DP strategy as well as communication and training		
Main responsibilities		
<ul style="list-style-type: none"> Strategy <ul style="list-style-type: none"> Support implementing Atos Data Protection strategy Support drafting, review and roll-out of policies: localization, translation if necessary Report & raise potential issues on policies with GDPO Support <ul style="list-style-type: none"> Support implementation of Atos Data Protection and Privacy Organization (incl. relevant policies) Supporting contracts and negotiations regarding data protection in his perimeter Tools: share & explain with relevant teams Legal reviews of Compliance Assessments of Data Processing (CADP) (global and in own perimeter) Participate in negotiation of DP requirements Provide & maintain legal templates in DP context Data Protection organization <ul style="list-style-type: none"> Support implementation of DP Organization Support setup and maintenance of operational organization (e.g., records of processing activities, CADPs, notifications, DPIA, data breach response) Be point of contact for Local DPLEs on Data Protection and Privacy Organization aspects and for operations on data protection legal matters Event/incident management <ul style="list-style-type: none"> Support Security organization in case of Personal Data Breach and events/incidents related to Data Protection: identify legal obligations & identify potential consequences Monitor regional & local DP related events/incidents: provide legal support and framework Identify Data Protection related measures (legal context) to be implemented in own perimeter - follow up on such Data Protection related measures & actions Awareness <ul style="list-style-type: none"> Contribute to Data Protection communication and organizing of local events (e.g., Data Protection Day), especially legal information Relay global & launch local information & communication campaigns Training <ul style="list-style-type: none"> Support RBU/CC¹/GDC DPO to identify training Support & roll-out trainings (mandatory & dedicated) Participate in Atos GDPO trainings (establish legal training content) & support training Local DPOs, DPCs, DDPs, DPLEs and teams Reporting <ul style="list-style-type: none"> Report status, KGI/KPI, communication actions, significant events/incidents, potential issues and DP organization status to GDPO 		
Interface	Objectives	Performance tracking
Direct report to -> GDC/country-cluster/RBU GC Functional report to -> GDPO Additional report to -> GDC/country-cluster/RBU Head	<ul style="list-style-type: none"> Supporting local DP-related operational activities Performing local DP-related 2nd level of defense activities Act as consultant and counterpart for local management regarding DP May become member of the Atos DP Board (individual appointment) 	<ul style="list-style-type: none"> Relevant KPI/KGI in DP for own perimeter Coverage / validation of CADP-C for own perimeter Coverage of CADP-P for own perimeter Coverage DPAs and DP Information Notices

Role description Local DPLE¹)

¹) Local Data Protection Legal Expert

Mission		
Local Data Protection Legal Expert , supporting legal aspects of data protection topics in his/her perimeter, supporting and implementing data protection organization, supporting contracts and negotiations regarding data protection, supporting local Data Protection Office, supporting implementation of DP strategy as well as communication and training		
Main responsibilities		
<ul style="list-style-type: none"> Strategy <ul style="list-style-type: none"> Support implementing Atos Data Protection strategy Support review and roll-out of policies Report & raise potential issues on policies with RBU/CC¹/GDC DPLE Support <ul style="list-style-type: none"> Support implementation of Atos Data Protection and Privacy Organization (incl. relevant policies) Support contracts and negotiations regarding data protection in his/her perimeter Support roll-out of practical operational tools Support completing necessary formalities with DPAs Legal reviews of Compliance Assessments of Data Processing (CADP) (local) Provide & maintain local/translated legal templates in DP context Data Protection organization <ul style="list-style-type: none"> Support implementation of DP Organization Support setup and maintenance of operational organization (e.o. records of processing activities, CADPs, notifications, DPIA, data breach response) Be point of contact for operations on local data protection legal matters Event/incident management <ul style="list-style-type: none"> Support Security organization in case of Personal Data Breach and events/incidents related to Data Protection: identify legal obligations & identify potential consequences Monitor local DP related events/incidents: provide legal support Identify Data Protection related measures (legal context) to be implemented in own perimeter - follow up on such Data Protection related measures & actions Awareness <ul style="list-style-type: none"> Contribute to Data Protection communication and organizing of local events (e.o. Data Protection Day), especially legal information Relay global & launch local information & communication campaigns Training <ul style="list-style-type: none"> Support RBU/CC¹/GDC DPLE to identify training Support & roll-out trainings (mandatory & dedicated) Participate in Atos GDPO trainings (establish legal training content) & support training Local DPOs, DPCs, DDPs, DPLEs and teams Reporting <ul style="list-style-type: none"> Report status, KGI/KPI, communication actions, significant events/incidents, potential issues and DP organization status to RBU/CC¹/GDC DPLE 		
Interface	Objectives	Performance tracking
Direct report to -> local Legal Counsel Functional report to -> RBU/CC ¹ /GDC DPLE Additional report to -> local management	<ul style="list-style-type: none"> Supporting local DP-related operational activities: legal aspects Act as consultant and counterpart for local management regarding DP legal aspects May become member of the Atos DP Board (individual appointment) 	<ul style="list-style-type: none"> Relevant KPI/KGI in DP for local perimeter Coverage / validation of CADP-C for local perimeter Coverage of CADP-P for local perimeter Coverage local DPAs and DP Information Notices