
Appendix 6 to Atos Group Binding Corporate Rules -
Procedure for Handling a Complaint from a Controller

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Version: 3.0
Document date: May 2022
Doc. No:

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Procedure for Handling a Complaint from a Controller Regarding Processing of its Personal Data by Atos

Where a Controller complains about the processing of Personal Data on its behalf by Atos, the following procedure shall be applied in order to guarantee a swift and efficient answer to the Controller's concern.

Several types of incidents may occur, and the applicable procedure should differ according to the request sent by the Controller.

STEP 1: Controller's request

Controllers which identify a possible breach or an existing breach of Data Protection Policy should complete the form attached in Appendix 6 bis. This form is also made available on Atos website.

This request should be sent to the Local Data Protection Office which will acknowledge receipt of the Controller's request within seven business days. This acknowledgement of receipt shall be made by using the standard letter set up in Appendix 6 ter.

STEP 2: Reception of the Controller's request and identification of the level of risk

The Local Data Protection Office shall then qualify the type of complaint according to the guidelines below.

Amber level	<ul style="list-style-type: none"> - Potential risk identified by Controller - Question regarding the security measures - Data subject right of access or deletion not appropriately handled according to Controller - Suspected Group DP Policy violation
Red Level	<ul style="list-style-type: none"> - Risk realized and identified by Controller - Customer issuing lawsuits - Data Protection Authority contacting Atos

STEP 3: Handling the case

Where the issue is considered as being of Amber level, the Local Data Protection Office shall provide Controller with an answer to its concern within **one (1) month**.

Where the issue is considered as being of Red level, the Local Data Protection Office shall forward the case to the Group Data Protection Office. Both the Local and the Global Data Protection Office shall work closely together in order to solve the issue in the most expedient way.

Cooperation and discussions with the Controller as per commitment in Section 10 of the Group DP Policy.

Annex 6.1

COMPLAINT FORM FOR CONTROLLER AGAINST ATOS

The standard letter form below shall be used by a Controller who intends to bring a complaint against Atos regarding processing under its Atos Group BCR. Please note that this form shall be filled in with relevant information.

* *
*

Dear Atos Local Data Protection Office in the country _____[Country],

I, _____[name and surname of the contacting person] representing _____[indicate name of the name of the Company; Country of establishment] acting as a Controller, hereby file a complaint regarding the processing of the Personal data you are currently bound to process under the Service Agreement [Indicate reference of the contract] and according to the instructions I provided you through the form attached to the contract [if Atos CADP, give its name].

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

I acknowledge that the complaint procedure is time-framed according to Appendix 6 of Atos Group BCR, and is deemed to have started as of _____ [indicate time where complaint is filed].

[I am aware that Atos may need to verify identities of any individuals]

Name, First Name	
Contact details	
Approximate date Personal Data were collected	
Description of the Complaint	<input type="checkbox"/> Risk regarding the processing of personal data carried out on behalf of Customer. Please describe the risk with details and impact assessment. <input type="checkbox"/> Question regarding the security measures. Please describe the question. <input type="checkbox"/> Data subject right of access or deletion not appropriately handled according to Customer. Please give relevant information as per Appendix 5. <input type="checkbox"/> Suspected Group Data Protection Policy violation. Please justify which provisions are at stake. <input type="checkbox"/> Other. Please describe

Annex 6.2

STANDARD RECEIPT OF ACKNOWLEDGMENT

Dear Controller,

We hereby acknowledge receipt of the complaint you have filed on _____
[indicate date complaint was sent by Controller] and that we received on _____
[indicate date complaint was received by Local Data Protection
Contact], regarding the processing of the Personal data Atos is currently bound to process under
the Service Agreement [Indicate reference of the contract].

We will handle your complaint according to the Procedure and the time frame set up in Appendix
6 of Atos Group BCR.

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

Kind regards,

The Local Data Protection Office / The Group Data Protection Office in the country
_____[Country]