
Appendix 9 to Atos Group Binding Corporate Rules -
Compliance Assessment of Data Processing When Atos Acts a Processor

Author: Global Data Protection Office
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An Atos Compliance Assessment of Data Processing as a Processor ("CADP-P") must be completed for all processing that Atos undertake as a Processor on behalf of a particular Customer to target an appropriate level of compliance. The purpose of this document is to allow Atos to meet several requirements under data protection law. The CADP-P is used by Atos as its primary tool for creating a record of processing or "identity card" in which to gather all relevant information regarding a particular processing activity which it undertakes as a Processor. The CADP-P must be completed at the earliest stage of the project and should be finalized, reviewed/validated and stored prior to signing the contract.

Therefore, it enables Atos to collect the instructions of the Controller in a documented manner and enables Atos to maintain its register of Processing Activities as a Processor. A CADP-P should be conducted by the Atos project / bid team responsible for the proposal and for projects where Atos acts as a Processor, with the assistance of the functional team and with guidance and (final) approval from the responsible Data Protection Legal Expert (DPLE) and / or Data Protection Officer (DPO).