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Appendix 1 to UK Binding Corporate Rules as a Controller  
Organisation of the Data Protection Community and Roles

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## Organisation of the Data Protection Community and Roles

### Data Protection Organisation Principles

Reflect operating model	<ul style="list-style-type: none"> <li>• Provide data protection support for Group and Local management</li> <li>• Maintain data protection expertise per Business Unit/Support Function</li> </ul>
Adhere to jurisdictions	<ul style="list-style-type: none"> <li>• Comply with legal obligations regarding appointment of data protection officers</li> <li>• Maintain necessary links to local legislation and Data Protection / Supervisory Authorities</li> <li>• Support regional / country cluster organization in the business</li> </ul>
Allow evolutive approach	<ul style="list-style-type: none"> <li>• Adapt role of Atos data protection specialists according to organisational and business development of the Group (iterative approach)</li> </ul>

### Data Protection Management Principles

Stay active	Data Protection is not a one-shot activity that required our attention, it is an ongoing endeavour. Atos needs a sound and stable data protection organisation 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 European Data Protection requirements, 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 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 data protection law threaten organisations 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, and the necessary means for maintaining knowledge and expertise.

## Group Data Protection Organisation

- ▶ 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

