
Appendix 5 to UK Binding Corporate Rules as a Controller
Personal Data Transfer – Description of Expected Data Transfers

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DESCRIPTION OF EXPECTED DATA TRANSFERS COVERED BY THE BCR WHEN ATOS ACTS AS A CONTROLLER

Atos UK BCR-C will cover all types of transfer made by Atos acting as a Controller.

I. **When an Atos Entity in the UK, acting as a Controller, is transferring data to an Atos Entity, acting as a Processor, located outside the UK**

A **Categories of Data Subjects**

- ▶ Employees (past, current and future) and associated persons
- ▶ Clients (current and potential)
- ▶ End-users of clients
- ▶ Providers
- ▶ Visitors

B **Categories of data**

a. Data relating to employees (past, current and future) and associated persons (e.g. their family or other relatives)

- ▶ Identification data
- ▶ Professional life
- ▶ Personal life
- ▶ Connection data
- ▶ Location data
- ▶ Social security number
- ▶ National identification number
- ▶ Financial and economic information
- ▶ Banking information
- ▶ Criminal offenses, judgements, security measures (when such data is collected by the companies of the Atos Group being under the obligation or allowed, locally, to collect it in accordance with applicable legislation)
- ▶ Philosophical, political, and religious opinions and beliefs, trade-union membership and affiliation, sexual orientation and preferences, health information, racial or ethnic origin (when such data is collected by the companies of the Atos Group being under the obligation or allowed, locally, to collect it in accordance with applicable legislation)
- ▶ Biometric data
- ▶ Account data, subscription and membership
- ▶ Death of persons

b. Data relating to clients and prospects

- ▶ Identification data
- ▶ Professional life
- ▶ Financial and economic information
- ▶ Connection data

c. Data relating to end-users of clients

- ▶ Identification data
- ▶ Professional life
- ▶ Financial and economic information
- ▶ Connection data

d. Data relating to providers and partners

- ▶ Identification data
- ▶ Professional life
- ▶ Financial and economic information
- ▶ Connection data

e. Data relating to visitors

- ▶ Identification and identity data
- ▶ Professional life

C Purposes of transfer outside the UK

Data may be transferred outside the UK for the purpose of conducting the entirety of the processes required to conduct the activities of the companies of the Atos Group, including, but not limited to:

a. Purposes related to the management of employees and associated persons:

- ▶ Operational management of the company (accounting, management of premises, including badges and access to premises and company restaurant, management of geolocation tools on site, management of site security, including video-surveillance tools, etc.)
- ▶ Management of employees, recruitment, payroll, social benefits, career, contracts, provision of IT tools (including individual surveillance of the use of such tools), training, management of whistleblowing alerts and associated investigations, implementation of tools to follow-up files and projects

b. Purposes related to the management of clients and prospects

- ▶ Management of clients and prospects (administrative and operational management, marketing communications, invoicing, satisfaction survey, management of client events, etc.)

c. Purposes related to the management of end-users of clients

- ▶ administrative and operational management, etc.

d. Management of suppliers and partners

- ▶ administrative and operational management, accounting, etc.

e. Purposes related to the management of visitors

- ▶ Operational management (security of the premises, access control, etc.)

f. Purposes relating to all categories of data subjects:

- ▶ Operational management of the company and its premises (management of premises, management of the security of the sites and premises, including access badges, video surveillance, etc.)
- ▶ Management of national and international litigations of the company
- ▶ Management of network and systems administration, including all security measures implemented for this purpose
- ▶ Database administration
- ▶ Data hosting and storage
- ▶ Corrective and evolutionary maintenance of tools, systems and applications implemented in the operation of the Group's activities
- ▶ Backup copies of information

- ▶ Data restore from backup
- ▶ Implementation of preventive and corrective security measures to prevent any unauthorized or unlawful access.
- ▶ Network and infrastructure Security Management

D **Anticipated Countries to which Personal Data may be transferred**

- ▶ Countries in the EEA
- ▶ India
- ▶ Malaysia
- ▶ Philippines
- ▶ USA
- ▶ Mexico

II. **When an Atos Entity in the UK, acting as a Controller, is transferring data to an Atos Entity, acting as a Controller, located outside the UK**

E **Categories of Data Subjects**

- ▶ Employees (past, current and future) and associated persons
- ▶ Clients (current and potential)
- ▶ End-users of clients
- ▶ Providers
- ▶ Visitors

F **Categories of data**

a. Data relating to employees (past, current and future) and associated persons (e.g. their family or other relatives)

- ▶ Identification data
- ▶ Professional life
- ▶ Personal life
- ▶ Connection data
- ▶ Location data
- ▶ Social security number
- ▶ National identification number
- ▶ Financial and economic information
- ▶ Banking information
- ▶ Criminal offenses, judgements, security measures (when such data is collected by the companies of the Atos Group being under the obligation or allowed, locally, to collect it in accordance with applicable legislation)
- ▶ Philosophical, political, and religious opinions and beliefs, trade-union membership and affiliation, sexual orientation and preferences, health information, racial or ethnic origin (when such data is collected by the companies of the Atos Group being under the obligation or allowed, locally, to collect it in accordance with applicable legislation)
- ▶ Biometric data
- ▶ Account data, subscription and membership
- ▶ Death of persons

b. Data relating to clients and prospects

- ▶ Identification data
- ▶ Professional life
- ▶ Financial and economic information

- ▶ Connection data

c. Data relating to end-users of clients

- ▶ Identification data
- ▶ Professional life
- ▶ Financial and economic information
- ▶ Connection data

d. Data relating to providers and partners

- ▶ Identification data
- ▶ Professional life
- ▶ Financial and economic information
- ▶ Connection data

e. Data relating to visitors

- ▶ Identification and identity data
- ▶ Professional life

G Purposes of transfer outside the UK

Data may be transferred outside the UK for the purpose of conducting the entirety of the processes required to conduct the activities of the companies of the Atos Group, including, but not limited to:

a. Purposes related to the management of employees and associated persons:

- ▶ Operational management of the company (accounting, management of premises, including badges and access to premises and company restaurant, management of geolocation tools on site, management of site security, including video-surveillance tools, etc.)
- ▶ Management of employees, recruitment, payroll, social benefits, career, contracts, provision of IT tools (including individual surveillance of the use of such tools), training, management of whistleblowing alerts and associated investigations, implementation of tools to follow-up files and projects

b. Purposes related to the management of clients and prospects

- ▶ Management of clients and prospects (administrative and operational management, marketing communications, invoicing, satisfaction survey, management of client events, etc.)

c. Purposes related to the management of end-users of clients

- ▶ administrative and operational management, etc.

d. Management of suppliers and partners

- ▶ administrative and operational management, accounting, etc.

e. Purposes related to the management of visitors

- ▶ Operational management (security of the premises, access control, etc.)

f. Purposes relating to all categories of data subjects:

- ▶ Operational management of the company and its premises (management of premises, management of the security of the sites and premises, including access badges, video surveillance, etc.)
- ▶ Management of national and international litigations of the company

- ▶ Management of network and systems administration, including all security measures implemented for this purpose
- ▶ Database administration
- ▶ Data hosting and storage
- ▶ Corrective and evolutionary maintenance of tools, systems and applications implemented in the operation of the Group's activities
- ▶ Backup copies of information
- ▶ Data restore from backup
- ▶ Implementation of preventive and corrective security measures to prevent any unauthorized or unlawful access.
- ▶ Network and infrastructure Security Management

H **Anticipated Countries to which Personal Data may be transferred**

All countries in which Atos Entities are located.