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## Appendix 9 to Atos UK Binding Corporate Rules as a Controller Responsibility Assignment Matrix: RACI

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## Responsibility Assignment Matrix: RACI

RACI: R: Responsible A: Accountable C: Consulted I: Informed

Below tables detail which roles have to execute what data protection related tasks

Activity	UK DP Office and Group Data Governance Office	Local DPLE	Local DPO
<b>ADOPTION OF THE BCR-C FOR THE ENTITIES</b> (Process used for the initial adoption of the BCR-P)			
Adopt an Intra-Group Agreement between Atos parent company and Atos entities regarding the bindingness of the UK BCR as a Controller (UK-BCR-C)	C	R (regarding the content of the IGA) / R (regarding the signature of the IGA)	A/R
For each UK BCR-C new member, determine whether or not a Local Board Decision is necessary	C	A/R	C
If yes: Present to the Local Board to request validation by the Board	C	A/R	C

Activity	UK DP Office and Group Data Governance Office	Local DPLE	Local DPO	New legal entity rep's
<b>ACCEPTATION OF UK BCR-C FOR THE SUBSEQUENT ENTITIES</b>				
Identify legal entity to sign UK BCR-C	A	C	I	R
Assess compliance to documented UK BCR-C criteria	I	C	C	A/R
Evaluate assessment (Formal meeting)	A	R	R	R
For each UK BCR-C new member, determine whether or not a Local Board Decision is necessary	C	A/R	IC	C
If yes: present to the Local Board to request validation by the Board	C	A/R	IC	C

Activity	UK DP Office and Group Data Governance Office	Local DPLE	Local DPO	New legal entity rep's
If accepted: sign-off IGA	A/R	R	I	R
Publish new member (adding to repository & adding to UK BCR-C-appendix)	A/R	I	I	I
Coordinate UK BCR-C-sign up activities	A/R	R	R	C

Activity	UK DP Office and Group Data Governance Office	Local DPLE	Local DPO	Local HR
<b>MAKING UK BCR-C BINDING AMONGST EMPLOYEES</b>				
Translate UK BCR-C into local language when required by Local law	I	A	A	R
Determine the local requirements regarding Work Councils	I	C	C	A/R
Where necessary, prepare communication pack for Work Councils presentation	I	C	C	A/R
Where necessary, needed: set up date and present to Workers Councils	I	C	C	A/R
Communicate broadly to all Employees the requirements of the UK BCR-C-rules (via mailing or through appropriate local communication channel)	A (for effective Communication at global level) / R (for drafting the communication)	C (for effective communication at local level)	R (for effective Communication at local level)	

Activity	UK DP Office and Group Data Governance Office	RBU DPLE	RBU DPO	Local DPLE	Local DPO	Line management
<b>TRAINING</b>						
Identify training needs	A/R	R (for the relevant scope)	R (for the relevant scope)	R (for the relevant scope)	R (for the relevant scope)	R (for the relevant scope)
Prepare the Global & General training	A/R (Design trainings (mandatory & dedicated))	C	C	C	C	I
Make DP training available for DP Community	A/R	C	R	C	C	
Train local DPOs and DPLEs	A/R	R	R	C	C	
Update DP training with local specificities, including translation (e.g. establish legal training content for local needs)	I	C	R	C (as a DPO team)	A (as a DPO team) /R	
Ensure DP training is effectively followed by Employees at local level (Roll-out mandatory and dedicated trainings)	C	I	C	I	C	A/R
Deliver classroom training when needed	A/R (for the relevant scope)	C (for the relevant scope)	A/R (for the relevant scope)	C (for the relevant scope)	A/R (for the relevant scope)	I

Activity	UK DP Office and Group Data Governance Office	RBU DPLE	RBU DPO	Local DPLE	Local DPO	Business/HR
<b>HANDLING DATA SUBJECT REQUESTS OR COMPLAINTS WHEN ATOS ACTS AS CONTROLLER</b>						
Receive data subject requests or complaints	C	I	I	C	A/R	I
Send receipt/ acknowledgement of the data subject request or complaint in due time & check identity	C	I	I	C	A/R	I
Analyze the data subject request or complaint	C	C	C	R	R	A/R
Resolve the data subject request or complaint	I	I	I	R	R	A/R

Activity	UK DP Office and Group Data Governance Office	RBU DPLE	RBU DPO	LOCAL DPLE	LOCAL DPO	Formal DP-contact	Business
<b>HANDLING A REQUEST FROM THE INFORMATION COMMISSIONER</b>							
Receive request	C	I	I	I	I	A/R	
Acknowledge request in a timely fashion	C	I	I	I	I	A/R	I (if concerned)
Analyze request	C	I	I	I	I	A/R	R (if concerned)
Answer request	C	I	I	I	I	A/R	
Follow up request	C	I	I	I	I	A/R	C (if concerned)

Activity	UK DP Office and Group Data Governance Office	RBU DPLE	RBU DPO	Local DPLE	Local DPO	Formal DP-contact	Business
<b>HANDLING OF LOCAL DATA PROTECTION AUTHORITY'S REQUESTS</b>							
Receive request	I	I	I	I	I	A/R	I (if concerned)
Acknowledge request in a timely fashion	I			I	I	A/R	I (if concerned)
Analyze the request	C	I	I	C	C	A/R	R (if concerned)
Answer the request	C	I	I	I	C	A/R	
Follow up the request	I	I	I	I	C	A/R	C (if concerned)

Activity	UK DP Office and Group Data Governance Office	RBU DPLE	RBU DPO	LOCAL DPLE	LOCAL DPO	Formal DP contact
<b>GENERAL NOTIFICATION/AUTHORIZATION REQUEST TO INFORMATION COMMISSIONER</b>						
Complete necessary local formalities with Data Protection Authorities	I	I	I	C	C	A/R
Monitor such requests/formalities	I	I	I	C	C	A/R
Where necessary consult Group lead data protection authority	C	I	I	C	C	A/R
Where necessary consult local data protection authority	I	I	I	C	C	A/R
First response to local DP related events: identify legal obligations (notifications, etc.)	I	A (as a RBU DPO team) /R	A (as a RBU DPO team) /R	R	R	

Activity	UK DP Office and Group Data Governance Office	RBU DPLE	RBU DPO	LOCAL DPLE	LOCAL DPO	Security team	Formal DP Contact	Business
<b>DATA BREACH NOTIFICATION TO INFORMATION COMMISSIONER</b>								
Complete Information Commissioner's Office (ICO) Data Breach Notification Template	C	C	C	A	R	R	R	R
Review Data Breach Notification	R	R	R	A	R		R	
Transmit the Data Breach Notification to the ICO	C	C	C	A	C		R	I
<b>DATA BREACH NOTIFICATION TO DATA SUBJECTS</b>								
Compose Data Breach Notification	C	C	C	A	C		I	R
Review Data Breach Notification	C	C	C	A/R	R		I	I
Transmit the Data Breach Notification to the relevant Data Subjects	C	C	C	A	C		I	R



Activity	UK DP Office and Group Data Governance Office	RBU DPLE	RBU DPO	LOCAL DPLE	LOCAL DPO	Global Procurement	Group Security Officer	Supplier Contract Lawyer
<b>DATA PROTECTION CLAUSES IN GLOBAL SUPPLIER CONTRACTS</b>								
Ensure that the Data Protection Clauses are part of any Contract where personal data is processed						A/R		
Review DP clauses in major contracts	C					C		A/R
Prepare Data Protection Addendum	C					A/R		C
Review and approve the security appendices	C (if needed)					A/R	C (if needed)	I
Get Data Protection Addendum signed	I					A/R		C

Activity	UK DP Office and Group Data Governance Office	RBU DPLE	RBU DPO	LOCAL DPLE	LOCAL DPO	Business	Local procurement
<b>DATA PROTECTION CLAUSES IN LOCAL SUPPLIER CONTRACTS FOR ATOS PROCESSING (Atos is Controller)</b>							
Ensure that Data Protection Clauses are part of all Contracts where personal data is processed				C		R	A/R
Review DP clauses in major contracts	I	I/C	I	C	C	I	AR
Review DP clauses in other contracts	I	I/C	I	C	C	I	AR
Prepare Data Protection Addendum in major contracts	C	C		C	I	C	A/R
Prepare Data Protection Addendum in other contracts	C	C		C	I	C	A/R
Get Data Protection Addendum signed				I	I	I	A/R
Review and approve the security appendices			C	I	C	A/R (jointly with Security Officer)	

Activity	Group Data Governance Office	RBU DPLE	RBU DPO	LOCAL DPLE	LOCAL DPO	Business Owner
COMPLIANCE ASSESSMENT OF DATA PROCESSING AS CONTROLLER AT GLOBAL LEVEL IN MYCADP TOOL						
Complete the CADP-C	C	I	I	I	I	A/R
Submit the CADP-C for GDPO review	I	I	I	I	I	A/R
Review the CADP as Controller (CADP-C)	A/R	R	R	I	I	R
Consider & implement corrective measures, if required and re-submit	I	I				A/R
Monitor ongoing compliance & keep record up to date	C (where needed)					A/R

Activity	Group Data Governance Office	RBU DPLE	RBU DPO	LOCAL DPLE	LOCAL DPO	Business Owner
COMPLIANCE ASSESSMENT OF DATA PROCESSING AS CONTROLLER AT LOCAL LEVEL IN MYCADP TOOL						
Complete the CADP-C	I	I	I	C	C	A/R
Submit the CADP-C for Local Review	I	I	I	I	I	A/R
Review the CADP-C	I	I	I	C	A/R	R
Consider & implement corrective measures, if required and re-submit	I			I	I	A/R
Monitor ongoing compliance & keep record up to date				C (where needed)	C (where needed)	A/R