Appendix 10 to Atos UK Binding Corporate Rules as a Processor

Responsibility Assignment Matrix: RACI

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

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

Activity	Group Data Governance Office	Local DPLE	Local DPO
ADOPTION OF THE UK BCR-P FOR THE ENTITIES **(Process used for the initial adoption of the UK BCR-P)**			
Adopt an Intra-Group Agreement between Atos parent company and Atos entities regarding the bindingness of the UK BCR as a Processor (UK-BCR-P)	C	R (regarding the content of the IGA) / R (regarding the signature of the IGA)	A/R
For each UK BCR-P 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
ACCEPTATION OF UK BCR-P FOR THE SUB-SEQUENT ENTITIES				
Identify legal entity to sign UK BCR-P	A	C	I	R
Assess compliance to documented UK BCR-P criteria	I	C	C	A/R
Evaluate assessment (Formal meeting)	A	R	R	R
For each UK BCR-P 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 Intra Group Agreement (IGA)	A/R	R	I	R
Publish new member (adding to repository & adding to UK BCR-P-appendix)	A/R	I	I	I
Coordinate UK BCR-P-sign up activities	A/R	R	R	C

Activity	UK DP Office and Group Data Governance Office	Local DPLE	Local DPO	Local HR
MAKING UK BCR-P BINDING AMONGST EMPLOYEES				
Translate UK BCR-P 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-P-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
TRAINING						
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 & GDC DPLE	RBU & GDC DPO	Local DPLE	Local DPO	Operational
HANDLING CUSTOMERS' REQUESTS OR COMPLAINTS AT GLOBAL LEVEL						
Receive complaints of Customer	I	I	I			A/R
Send A/R of the complaint in due time	I	I	I			A/R
Analysis of the complaint	C	I	I			A/R
Resolution of the complaint	C	I	I	I	I	A/R
HANDLING CUSTOMERS' REQUESTS OR COMPLAINTS AT LOCAL LEVEL						
Receive complaints of Customer	I	I	I	I	I	A/R
Send A/R of the complaint in due time	I	I	I	I	I	A/R
Analysis of the complaint	C (where needed)	C (where needed)	C (where needed)	R	R	A/R
Resolution of the complaint	C (where needed)	I	I	C	C	A/R

Activity	UK DP Office and Group Data Governance Office	RBU & GDC DPLE	RBU & GDC DPO	Local DPLE	Local DPO	Operational
HANDLING DATA SUBJECTS COMPLAINTS RECEIVED WHEN ACTING AS A PROCESSOR						
Receive complaints of Data Subjects	I (report of KPI by Local)	I (report of KPI by Local)	I (report of KPI by Local)	A (as a DPO team) /R	A (as a DPO team) /R	I (where concerned)
Send A/R of the complaint in due time				A (as a DPO team) /R	A (as a DPO team) /R	I (where concerned)
Provide the contract related to the Request/ Complaint	R			A (as a DPO team) /R	A (as a DPO team) /R	R
Reviewing the provisions of the Contracts regarding the agreed responsibilities with Clients regarding Data Subjects	C (where needed)	C (where needed)	C (where needed)	A (as a DPO team) /R	A (as a DPO team) /R	I (where concerned)
According to the terms of the Agreement, transfer the request/complaint to the Client	I (report of KPI by Local)	I (report of KPI by Local)	I (report of KPI by Local)	I	I	A/R
According to the terms of the Agreement, direct resolution of the request/complaint	C (where needed)	C (where needed)	C (where needed)	A (as a DPO team) /R	A (as a DPO team) /R	R

Activity	UK DP Office and Group Data Governance Office	RBU DPLE	RBU DPO	LOCAL DPLE	LOCAL DPO	Formal DP-contact	Business
HANDLING A REQUEST FROM THE INFORMATION COMMISSIONER							
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
HANDLING OF LOCAL DATA PROTECTION AUTHORITY'S REQUESTS							
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
GENERAL NOTIFICATION/AUTHORIZATION REQUEST TO INFORMATION COMMISSIONER						
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	Global Procurement	Group Security Officer	Supplier Contract Lawyer
DATA PROTECTION CLAUSES IN GLOBAL SUPPLIER CONTRACTS								
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
DATA PROTECTION CLAUSES IN LOCAL SUPPLIER CONTRACTS FOR CLIENT CONTRACTS (Atos is Processor)							
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 PROCESSOR AT GLOBAL LEVEL IN MYCLIENTCADP TOOL						
Complete the CADP-P	C	I	I	I	I	A/R
Submit the CADP-P for GDPO review	I	I	I	I	I	A/R
Review the CADP as Processor (CADP-P)	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 PROCESSOR AT LOCAL LEVEL IN MYCLIENTCADP TOOL						
Complete the CADP-P	I	I	I	C	C	A/R
Submit the CADP-P for Local Review	I	I	I	I	I	A/R
Review the CADP-P	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