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Appendix 5 to Atos UK Binding Corporate Rules as a Processor

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## Procedure for Handling a Complaint from a Controller Regarding Processing of its Personal Data by Atos

Where a Controller complains about the processing of Personal Data on its behalf by Atos, the following procedure shall be applied in order to guarantee a swift and efficient answer to the Controller's concern.

Several types of incidents may occur, and the applicable procedure should differ according to the request sent by the Controller.

### STEP 1: Controller's request

Controllers which identify a possible breach, or an existing breach, of Data Protection Policy should complete the form attached in Annex 1. This form is also made available on the Atos website.

This request should be sent to the UK Data Protection Office which will acknowledge receipt of the Controller's request within seven business days. This acknowledgement of receipt shall be made by using the standard letter set up in Annex 1 or a letter taking a similar form.

### STEP 2: Reception of the Controller's request and identification of the level of risk

The UK Data Protection Office shall then qualify the type of complaint according to the guidelines below.

<b>Amber level</b>	<ul style="list-style-type: none"> <li>- Potential risk identified by Controller</li> <li>- Question regarding the security measures</li> <li>- Data subject right of access or deletion not appropriately handled according to Controller</li> <li>- Suspected Group DP Policy violation</li> </ul>
<b>Red Level</b>	<ul style="list-style-type: none"> <li>- Risk realized and identified by Controller</li> <li>- Customer issuing lawsuits</li> <li>- Data Protection Authority contacting Atos</li> </ul>

### STEP 3: Handling the case

Where the issue is considered as being of Amber level, the UK Data Protection Office shall provide the Controller with an answer to its concern within **one (1) month**.

Where the issue is considered as being of Red level, the UK Data Protection Office shall forward the case to the Group Data Protection Office. Both the UK and the Global Data Protection Office shall work closely together in order to solve the issue in the most expedient way.

Cooperation and discussions with the Controller as per commitment in Section 8 of the Atos Group DP Policy.

## Annex 1

### COMPLAINT FORM FOR CONTROLLER AGAINST ATOS

The standard letter form below shall be used by a Controller who intends to bring a complaint against Atos regarding processing under its UK BCR-P. Please note that this form shall be filled in with relevant information.

This is only a template that may be used freely by Controller – a complaint received in another format will also be studied according to the procedure described above.

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Dear Atos UK Data Protection Office,

I, \_\_\_\_\_ [ name and surname of the contacting person] representing \_\_\_\_\_ [indicate name of the name of the Company; Country of establishment] acting as a Controller, hereby file a complaint regarding the processing of the Personal Data you are currently bound to process under the Service Level Agreement [Indicate reference of the contract] and according to the instructions I provided you through the form attached to the contract [if Atos CADP, give its name].

Please find below, the information relating to our complaint, which I should be grateful if you could handle appropriately.

I acknowledge that the complaint procedure is time-framed according to Appendix 5 of the UK BCR-P and is deemed to have started as of \_\_\_\_\_ [indicate time where complaint is filed].

[Please note Atos may need to contact you to verify your identity]

<b>Name, First Name</b>	
<b>Contact details</b>	
<b>Approximate date Personal Data were collected</b>	
<b>Description of the Complaint</b>	<input type="checkbox"/> Risk regarding the processing of personal data carried out on behalf of Customer. Please describe the risk with details and impact assessment. <input type="checkbox"/> Question regarding the security measures. Please describe the question. <input type="checkbox"/> Data subject right of access or deletion not appropriately handled according to Customer. Please give relevant information as per Appendix 5. <input type="checkbox"/> Suspected Group Data Protection Policy violation. Please justify which provisions are at stake. <input type="checkbox"/> Other. Please describe

## Annex 2

### STANDARD RECEIPT OF ACKNOWLEDGMENT

Dear Controller,

We hereby acknowledge receipt of the complaint you have filed on \_\_\_\_\_  
[indicate date complaint was sent by Controller] and that we received on  
\_\_\_\_\_ [indicate date complaint was received by Local Data Protection  
Contact ].

We will handle your complaint according to the Procedure and the time frame set up in Appendix 5 of Atos BCR.

In the meantime, we remain at your disposal to discuss this further.

Kind regards,

\_\_\_\_\_  
The Atos UK Data Protection Office / The Atos Group Data Protection Office