

# General Data Protection Regulation (GDPR) for the Atos Group Alert System

Privacy information notice according Art. 13/14



**Atos**

# Explanation

## Controller and representative

Atos SE on behalf of all of the companies in the Atos Group.

## Contact details data protection officer

Atos Group Data Protection Office: [dpo-global@atos.net](mailto:dpo-global@atos.net)

## Purpose and legal basis

The purpose of the processing is to ensure that if an Atos employee or a third party considers that a law, regulation, one of the principles set out in the Code of Ethics has been or is about to be breached, or in the event of a threat or serious prejudice to the general interest of the Group, he/she may report this in accordance with local laws relating to Whistleblowing and know that their concerns will be taken seriously and investigated, and in order to prevent or remedy legal breaches and manage legal risk. This whistleblowing system is referred to in the Atos Code of Ethics.

The legal basis for the processing of these data is as follows:  
In all countries where there is a legal requirement to have a Whistleblowing System the basis for data processing is legal requirement. In all other countries where Atos operates it is the legitimate interest of Atos to have the same rules apply everywhere and to have a similar legal risk management process and approach.

## Categories of data

In connection with the use of the Atos Group Alert System, Atos processes the following categories of data:

- Identity, functions and contact details of the Whistleblower if the alert is not anonymous;
- Identity, functions and contact details of the persons mentioned in the Alert;
- Identity, functions and contact details of the persons involved in collecting or processing the Alert;
- Reported facts;
- Information collected as a result of the investigation checks conducted in relation to the reported facts;
- Report on the investigation operations;
- Actions taken in response to the Alert.

Atos processes the data which the Whistleblower voluntarily offers. As this will depend on the case and on the decisions made by the Whistleblower therefore it is not possible to define all the categories of data that will be shared. All data pushed by the Whistleblower which is relevant to the investigation will be processed. Data are only processed for the purposes outlined above, as per the minimisation principle, therefore if data is submitted by the Whistleblower which is not relevant to the Alert or is not allowed to be processed under local laws, then it will be deleted.

It should be noted that the Atos Group Alert System is voluntarily used by employees and third parties, and there is no obligation on them to use this process rather than alternatives to raise their concerns.

## Recipients or categories of recipients

In most cases the data will only be processed within Atos by the Global Compliance Team plus if necessary one additional member of an investigation team. It is possible that there might be a need to share the data, if requested by a judicial authority.

## Legitimate interests

In those countries where the legal basis does not apply (i.e. where there is no legal requirements for a whistleblowing system), the basis of the data processing is legitimate interest. The data is processed in fulfilment of the legitimate objective of having the same set of rules applying throughout the Group with the same legitimate interest of ensuring that the organization and its employees are not damaged by any form of malpractice (eg bribery, corruption, fraud) and employees and third parties are able to raise concerns and be protected from retaliation when so doing, and can be reassured that their concerns are taken seriously and investigated. A Legitimate Interest Assessment has been conducted in relation to this process to ensure that every aspect of the processing is done in line with fundamental rights and freedoms of individuals.

## Third country transfer

There may be a transfer to third countries, as the Global Compliance Team or investigator might be based in a different Atos legal entity and country to the Whistleblower.

An adequate level of data protection is ensured by:

- Atos Binding Corporate Rules.
- EU standard data protection clauses.

## Storage limitation

- In the event that the Alert does not fall in the scope of the Group Alert System, the personal data in question is immediately destroyed.
- If an investigation is conducted, and once it is completed, the data will only be kept for the time strictly necessary to handle the Alert and its outcomes. If no action is subsequently taken on the Alert, the information in the file identifying the Whistleblower and the persons mentioned in the Alert shall be destroyed within two (2) months of the closure of the investigation.
- When a disciplinary or judicial action is taken against the persons mentioned in the Alert or the author of an abusive Alert, the related data are kept until the end of the procedure including appealing of the decision.

## Rights of data subjects

Data subjects have:

- The right to information regarding how their personal data is processed.
- The right to access their personal data processed by Atos.
- The right to erasure which allows them to require their personal data to be deleted by Atos.
- The right to rectification that allows them to obtain the rectification of inaccurate or incomplete personal data.
- The right to restriction of processing which allows them to control how their data is processed.
- The right to object the processing of their personal data which means that they can require that Atos ceases to process their personal data.

They may also have the right to ask for their personal data in a portable format or restrict or object to the processing of their personal data. In case they would like to exercise their rights or lodge a complaint, they may click here <https://atos.net/en/privacy/exercise-rights-regarding-personal-data> or contact the Data Protection Authority of their country.

## Data source

Personal data can be collected either directly or indirectly on the Atos Group Alert System. Information is collected directly when a Whistleblower chooses to inform Atos of their personal information. Where it is legally allowed, they also have the option to report anonymously. Information is collected indirectly when a Whistleblower includes in their report personal data relating to other employees or third parties, for example those involved in the situation to which the Alert relates. The subject of any Alert will be notified as soon as possible provided this does not prejudice the investigation and collection of evidence. The system does not use tracers or cookies.

## Revision date

This Privacy Notice was updated on 25 August 2021 and may be amended from time to time.

# About Atos

Atos is a global leader in digital transformation with 105,000 employees and annual revenue of over € 11 billion.

European number one in cybersecurity, cloud and high performance computing, the Group provides tailored end-to-end solutions for all industries in 71 countries. A pioneer in decarbonization services and products, Atos is committed to a secure and decarbonized digital for its clients. Atos operates under the brands Atos and Atos|Syntel. Atos is a SE (Societas Europaea), listed on the Next 20 Paris Stock Index.

The purpose of Atos is to help design the future of the information space. Its expertise and services support the development of knowledge, education and research in a multicultural approach and contribute to the development of scientific and technological excellence. Across the world, the Group enables its customers and employees, and members of societies at large to live, work and develop sustainably, in a safe and secure information space.

[Find out more about us](#)

[atos.net](https://atos.net)

[atos.net/career](https://atos.net/career)

Let's start a discussion together



Atos, the Atos logo, Atos|Syntel and Unify are registered trademarks of the Atos group. September 2021 © Copyright 2021, Atos S.E. Confidential information owned by Atos. to be used by the recipient only. This document, or any part of it, may not be reproduced, copied, circulated and/or distributed nor quoted without prior written approval from Atos.