



# CAPGEMINI UK BINDING CORPORATE RULES FOR CONTROLLER ACTIVITIES

**Public  
Version**



# VERSION HISTORY

Version History		
Version	Date	Comments
1	February 2022	Approved by the Information Commissioner's Office
1.1	November 2023	Update to list of companies set out in Appendix 1
1.2	October 2024	Update to list of companies set out in Appendix 1
1.3	November 2025	Update to list of companies set out in Appendix 1

Authors and Contributions		
Role	Activity	Comments
Capgemini Group DPO Office	Create and review	
UK and Ireland DPO	Reviewed and Approved	

Document Distribution		
Role	Location	Action/Information
	Public	Available on the Capgemini website

Document Reviewed and Approved by		
Role	Responsibility	Comments
Capgemini Group DPO Office	Data Protection	
UK and Ireland DPO	Data Protection	

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# INTRODUCTION TO THE CAPGEMINI UK DATA CONTROLLER BCR

As a global leader in consulting, technology services and digital transformation, Capgemini is at the forefront of innovation to address the entire breadth of clients' opportunities in the evolution of cloud, digital and platforms. Building on its strong 50-year heritage and deep industry-specific expertise, Capgemini enables organisations to realise their business ambitions through an array of services from strategy to operations. Capgemini therefore processes large amounts of personal data.

Capgemini is committed to protecting all personal data entrusted to it as part of its activities as a Data Controller and as a Data Processor. As an international group with entities located in more than 40 countries, Capgemini needs to ensure that information flows freely and securely. Providing an appropriate level of protection to the personal data being transferred within the group is one of the reasons why Capgemini has chosen to implement both EU and UK Binding Corporate Rules (BCR), which are laid down in separate documents. The EU BCR are available on Capgemini's website, and have a different scope than the UK BCR.

The UK Data Controller BCR were approved by the UK Information Commissioner in February 2022.

Capgemini BCR not only define the principles with which it shall comply when processing personal data but also specify the procedures designed to address Capgemini compliance with applicable data protection laws and, in particular, with the UK General Data Protection Regulation (UK GDPR).

# DEFINITIONS

The terms used in this document are defined as follows:

“Applicable DP Law” means any applicable laws and regulations relating to the processing of Personal Data.

“Applicable UK DP Law” means all data protection laws applicable in the UK, in particular, the UK GDPR and the Data Protection Act 2018 (as amended or restated from time to time).

“Adequate Country” means a country, territory, sector, or international organisation that are covered by UK adequacy regulations, having been assessed as providing ‘adequate’ protection for Data Subjects’ rights and freedoms for their Personal Data.

“EU Binding Corporate Rules” or “EU BCR” means both the EU Data Controller and the EU Data Processor Binding Corporate Rules which are comprised in a consolidated document; were first approved in 2016 and updated in 2019. Together with the UK BCR, referred to as “Binding Corporate Rules” or “BCR”.

“Capgemini Business Contact” means a Capgemini supplier, subcontractor, shareholder, client or partner.

“Capgemini” or “Group” means all the entities owned and/or controlled directly or indirectly by Capgemini SE.

“Capgemini Company(ies)” means any entity which is part of the Group, and which is bound by the UK Data Controller BCR.

“Capgemini Client” means any natural or legal person to which Capgemini provides services to, pursuant to an agreement.

“Capgemini Employee” means any and all current, former or prospective staff member of Capgemini, including agency workers and interns.

“Cybersecurity Organisation” means the global function creating and managing global security policies; and tracking compliance from Business Units and Global Business Lines. The Cybersecurity Organisation is made up of a network of Cybersecurity Officers appointed for each Business Unit.

“Data Controller” or “Controller” means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data.

“Data Protection Impact Assessment” or “DPIA” means a process designed to describe the processing, assess its necessity and proportionality and help manage the risks to the rights and freedoms of natural persons resulting from the processing of Personal Data by assessing them and determining the measures to address them.

“Data Protection Officer” or “DPO” means the designated Capgemini Employees possessing expert knowledge of data protection law and practices, dedicated to advise, inform, and monitor compliance with the Applicable Law, and who are part of the Data Protection Organisation described in Section 8.

“Data Processor” or “Processor” means a natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller.

“Data Subject” means any identified or identifiable natural person whose Personal Data is processed.

“Employee Personal Data” means Personal Data relating to a current, former or prospective Capgemini Employee.

“General Data Protection Regulation” or “GDPR” means Regulation (EU) 2016/679 of the European Parliament and the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.

“ICO” or the “Commissioner” means the Information Commissioner, the UK independent body tasked with upholding information rights (i.e. the UK Data Protection Authority).

“Intra-Group Agreement” means the document designed to make the UK Data Controller BCR binding upon the Capgemini Companies.

“Non-UK Capgemini Company” means a Capgemini Company established outside of the UK.

“Personal Data” means any information relating to an identified or identifiable natural person (i.e. “Data Subject”). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

“Processing” means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

“Personal Data Breach” or “Data Breach” means the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Data transmitted, stored or otherwise processed, whether resulting from a security breach or not.

“Service Agreement” means a written agreement between a Controller and Processor whereby the Processor shall provide services to the Controller and which entails the processing of Personal Data by the Processor under the instructions of the Controller.

“Special Categories of Personal Data” means Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation.

“Standard Contractual Clauses” or “SCC” means a standard set of clauses recognized by Applicable UK DP Laws as providing an adequate level of protection for Personal Data transferred outside of the UK.

“Supervisory Authority(ies)” or “Data Protection Authority(ies)” means the public authorities responsible for monitoring the application of the GDPR and/or any Applicable Laws.

“Transfer” or “Transfers” means the disclosure, transmission or the process of making Personal Data available to any third-party.

“UK Capgemini Company” means a Capgemini Company established in the UK.

“UK Binding Corporate Rules” or “UK BCR” means both the UK Data Controller and the UK Data Processor Binding Corporate Rules.

“UK Data Controller Binding Corporate Rules” or “UK Data Controller BCR” means this document together with its appendices.

“UK General Data Protection Regulation” or “UK GDPR” means the General Data Protection Regulation (EU) 2016/679, as retained in UK law by the European Union (Withdrawal) Act 2018 and amended by the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019 No. 419.

# 1. SCOPE OF THE UK DATA CONTROLLER BCR

The UK Data Controller BCR apply to Transfers of Personal Data carried out by Capgemini as a Data Controller and which are subject to Transfer restrictions under Applicable UK DP Law.

Where Applicable DP Law requires a higher level of protection than the commitments defined under the UK Data Controller BCR, it will take precedence over the UK Data Controller BCR.

## 1.1 Material Scope

As Data Controller, Capgemini mainly processes the Personal Data of its Employees and Business Contacts.

The purposes of such processing are related to human resources, internal and external communication, marketing, compliance, etc.

For a more comprehensive view of Capgemini's processing activities as a Controller, refer to Appendix 2.

## 1.2 Geographical Scope

The Capgemini Companies, bound by the UK Data Controller BCR, are listed in Appendix 1.

The UK Data Controller BCR apply to Transfers of Personal Data carried out by Capgemini that are subject to Transfer restrictions under Applicable UK DP Law.

In practice, this means that the UK Data Controller BCR will apply to Personal Data transferred from, for example:

- A UK Capgemini Company to a non-UK Capgemini Company, where the non-UK Capgemini Company is established in a non-Adequate Country; and
- A non-UK Capgemini Company to another non-UK Capgemini Company, where the non-UK Capgemini Company is established in a non-Adequate Country, and where such Transfer is subject to restrictions under Applicable UK DP Law.

## 2. BINDINGNESS OF THE UK DATA CONTROLLER BCR

Each Capgemini Company, and its Employees, are legally bound by and required to comply with the UK Data Controller BCR.

### 2.1 Bindingness upon Capgemini Companies

In practice, each entity of Capgemini gives a power of attorney to Capgemini International B.V. to sign the Intra-group Agreement on its behalf so that each Capgemini entity is effectively bound to comply with the UK Data Controller BCR vis-à-vis each other. By signing the Agreement, the Capgemini entity commits to comply with the provisions of the UK Data Controller BCR, and to implement them within its own organisation.

As for newly acquired Capgemini entities, located outside the UK, in a non-Adequate Country, no Personal Data shall be transferred to them by a UK Capgemini Company, until they are effectively bound by the UK Data Controller BCR according to the above-mentioned mechanism.

### 2.2 Bindingness upon Capgemini Employees

All Capgemini Employees are bound by the UK Data Controller BCR through a specific mention in their employment contracts and/or through the obligation, contained in all employment contracts, to comply with the Group's policies, which include the UK Data Controller BCR.

As further detailed in Sections 9 and 16 of the UK Data Controller BCR, Capgemini Employees are made aware of the UK Data Controller BCR, and the ensuing obligations, through internal communication and training. Capgemini Employees are also made aware of the fact that non-compliance with the UK Data Controller BCR may lead to sanctions, up to and including dismissal, according to applicable local laws.

### 3. DATA PROTECTION PRINCIPLES IMPLEMENTATION WITHIN CAPGEMINI

Capgemini is committed to complying with the data protection principles set out in these UK Data Controller BCR, irrespective of Applicable DP Law, unless Applicable DP Law is providing more stringent requirements than those set out in the UK Data Controller BCR. All these principles are promoted and implemented within Capgemini through a set of privacy by design policies and trainings.

Furthermore, Capgemini shall comply with Applicable UK DP Law.

#### 3.1. Clear identified purpose

Capgemini shall only process Personal Data for specified, explicit and legitimate purposes and not further process it in a manner that is incompatible with those purposes.

In practice, this means that the purposes of every Processing must be determined and expressly defined prior to the collection of Personal Data.

In addition, Capgemini must ensure that Personal Data are not further processed in a way incompatible with the purposes for which they were originally collected.

#### 3.2. Legal basis

Capgemini shall only process Personal Data if one of the following conditions is fulfilled:

- The Processing is necessary to comply with a legal obligation to which Capgemini is subject. Eg: communicate Personal Data to tax authorities for instance.
- The Processing is necessary for the performance of a contract to which the Data Subject is party or to take steps, at the request of the Data Subject, prior to entering into a contract. Eg: of employment contracts for instance, Processing salary information and bank account details is necessary to pay salaries
- The Processing is necessary for the purposes of the legitimate interest pursued by Capgemini or by a third party. Eg: where Capgemini has a legitimate interest in getting to know its clients' preferences to be able to personalise its offers, and ultimately offer services that better meet the needs and expectations of clients.

Where relying on legitimate interest, Capgemini will perform a balancing test to determine whether its legitimate interests are overridden by those of the Data Subjects, or their fundamental rights and freedoms, in circumstances where the Personal Data of such Data Subjects must be protected.

- The Processing is necessary to protect the vital interests of the Data Subject or of another natural person. Eg: where the Data Subject is physically or legally unable to give his/her consent to the Processing, and his/her safety or health is at stake.
- The Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. Eg: where an officer of a public body competent for investigating a crime asks Capgemini for cooperation in an ongoing investigation. Subsection 4) and 5) above are very unlikely to apply to Capgemini.

Where none of the above-mentioned legal bases can apply to a situation at stake, Capgemini can seek to obtain the Data Subject's consent. To be valid, such consent shall be freely given, specific, informed and unambiguous.

- In practice, this means that Capgemini shall not engage in any data Processing activity if it is not able to demonstrate that one of the above-mentioned conditions is fulfilled.

### 3.3. Data minimisation

Capgemini shall only collect and further process the Personal Data which is strictly necessary in relation to the purposes defined beforehand.

In practice, this means that when designing a project involving the Processing of Personal Data, Capgemini must determine which Personal Data are strictly necessary to achieve the contemplated purposes. As a result, Capgemini shall not collect and store non-essential Personal Data just to have the possibility to use such Personal Data for a hypothetical purpose which it would define in the future.

### 3.4. Data quality

Capgemini shall ensure that Personal Data are accurate and kept up to date throughout the lifecycle of the Processing.

In practice, this means that Capgemini must provide Data Subjects with means to request inaccurate Personal Data to be corrected, updated or deleted as detailed in the Data Subjects' requests handling procedure described in Appendix 4. In addition, Capgemini must ensure that it is technically able to delete or rectify the Data upon request of the Data Subjects.

### 3.5. Data retention limitation

Capgemini must keep Personal Data for no longer than necessary in relation to the purposes for which the Personal Data were collected.

This means that Capgemini must define the data retention period beforehand and according to the purposes of the Processing, taking into account and balancing the elements listed below:

- the applicable legal requirements;
- the business needs;
- the interests of the Data Subjects whose Personal Data are processed.

In practice, for each project involving the Processing of Personal Data, Capgemini must put in balance the overall objective of the project and document such assessment.

### 3.6. Security

Capgemini must implement all the appropriate technical and organisational measures to ensure the security of the Personal Data entrusted to it, and guard against the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of or access to the Personal Data.

In practice, this means that, as a minimum, Capgemini must implement the requirements and good practices defined by the Cybersecurity Organisation.

In the event of a Data Breach, Capgemini must document the Breach in a dedicated register and notify it to the relevant management and DPO according to the internal Data Breach procedure. The documentation shall be made available to the ICO upon request.

Where the Data Breach is likely to result in a risk to the rights and freedoms of individuals, Capgemini must also notify the ICO, subject to Applicable UK DP Laws, without undue delay and no later than 72 hours after having become aware of it. In case the Data Breach is likely to result in a high risk to the rights and freedoms of the Data Subjects, Capgemini must notify them.

## 3.7. Processing of Special Categories of Personal Data

Capgemini shall only process Special Categories of Personal Data when strictly necessary or legally required.

When processing Special Categories of Personal Data, Capgemini must implement reinforced technical and organisational measures to ensure the security of the Processing.

## 3.8. Automated individual decision

Data Subjects have the right not to be subject to a decision based solely on automated Processing, including profiling, which produces legal effects concerning them or significantly affects them. However, this right does not apply if the decision is:

- Necessary for entering into, or performance of, a contract between the Data Subject and Capgemini;
- Authorised by UK law to which the Controller (Capgemini) is subject and which also lays down suitable measures to safeguard the Data Subject's rights and freedoms and legitimate interests; or
- Based on the Data Subject's explicit consent.

Capgemini must strive to explain to the Data Subjects the underlying logic of any automated Processing they are subject to.

In practice, this must be done in the information notice which shall be provided to data subjects as stated under Section 6 of these UK Data Controller BCR.

## 4. INTERNAL AND EXTERNAL PROCESSING

### 4.1 Basic obligation – Data Processing Agreement or Clause (“DP Clause”) in the Service Agreement

Capgemini shall rely on Processors either within or outside of the Group only to the extent that such Processors provide sufficient guarantees to implement technical and organisational measures to ensure that the Processing is carried out in compliance with Applicable UK DP Law and the principles set out in the UK Data Controller BCR.

In practice, this means that, when relying on a third-party or on another Capgemini Company acting as a Data Processor, Capgemini shall enter into a Service Agreement which sets up the conditions under which the processing activities must take place. The Service Agreement shall contain a DP Clause reflecting as a minimum that the Processor must:

- process the Personal Data only on the documented instructions of Capgemini – including with regard to Transfers outside of the UK, to a non-Adequate Country;
- ensure that persons authorised to process the Personal Data have committed themselves to confidentiality;
- implement technical and organisational measures to ensure an appropriate level of protection to the Personal Data;
- only use a sub-Processor with the prior specific or general authorisation of Capgemini and enter into a Service Agreement with the sub-Processor providing the same obligations as the ones described here;
- assist Capgemini for the fulfilment of its obligation to respond to requests from Data Subjects;
- assist Capgemini in ensuring compliance with its obligations in terms of security of the processing, carrying out DPIAs, reporting Data Breaches;
- at the choice of Capgemini and as agreed in the Service Agreement, to either delete or return the Personal Data after the end of the provision of services relating to the Processing;
- make available to Capgemini all the information necessary to demonstrate compliance with its obligations under the Applicable UK DP Law, and in particular allowing Capgemini to conduct audits;
- report any Data Breach to Capgemini without undue delay.

In any case, where relying on a third party, Capgemini shall carry out an assessment of the data protection and security guarantees which such third party commits to implement and to comply with.

### 4.2 Additional obligation in case of a Transfer to a third country

In addition to the implementation of the above-mentioned Data Processing Agreement or Clause, where Processing gives rise to Transfers to non-Adequate Countries, Capgemini must guarantee that an adequate level of protection is provided, as per the requirements defined below.

In practice, this means that where a Capgemini Company acting as Controller Transfers Personal Data to a Capgemini Company in a non-Adequate Country acting either as Controller or as Processor, and such Transfer is subject to Transfer restrictions under Applicable UK DP Law, these UK Data Controller BCR shall apply.

Where a Capgemini Company Transfers Personal Data to a third-party, acting as Controller or Processor and located in a non-Adequate Country, it must enter into the relevant Standard Contractual Clauses with said third-party or rely on another lawful Transfer mechanism as required under Applicable UK DP Law.

## 5. TRANSPARENCY

Capgemini must provide the Data Subject with all the required information regarding the Processing of his or her Personal Data.

In practice, this means that where Personal Data relating to a Data Subject are collected directly from him or her, Capgemini must provide them with the following information:

- The identity and contact details of the Capgemini Company acting as Controller;
- The contact details of the competent local DPO;
- The purposes of the Processing for which the Personal Data are intended as well as the legal basis for the Processing;
- Where the Processing is based on Capgemini's legitimate interest, the description of the interest pursued by Capgemini;
- The recipients or categories of recipients if any;
- Where applicable, the fact that Capgemini intends to Transfer Personal Data outside of the UK, and the existence or absence of an adequacy decision under Applicable UK DP Law, or the reference to the appropriate safeguards (i.e. UK Data Controller BCR or Standard Contractual Clauses) and how to obtain a copy of them or where they have been made available;
- The period for which Personal Data will be stored, or if it is not possible, the criteria used to determine this period;
- The right for the Data Subject to request access to and rectification or erasure of Personal Data or restriction of Processing or to object to the Processing, as well as the right to data portability;
- Information about the Data Subject's third-party beneficiary rights, including the means to exercise those rights;
- Where the Processing is based on the consent of the Data Subject, the right to withdraw consent at any time, without affecting the lawfulness of the Processing;
- The right to lodge a complaint before the ICO;
- Whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether the Data Subject is obliged to provide the Personal Data and the possible consequences of failure to provide such Data;
- The existence of automated decision-making, including profiling, and information about the logic involved, as well as the significance and the envisaged consequences of such Processing for the Data Subject.

Where the Personal Data have not been obtained directly from the Data Subject, Capgemini shall still provide him or her with the above-mentioned information as well as with the description of the categories of Personal Data and the source of said Personal Data. Capgemini must provide the afore-mentioned information to the Data Subject within a reasonable period, which shall not exceed one (1) month after obtaining the Personal Data. If the Data is used to contact the Data Subject, Capgemini must provide him or her with the information at the time of that first communication.

## 6. DATA SUBJECTS' ENFORCEMENT RIGHTS

Data Subjects can enforce the following elements of the UK Data Controller BCR:

The data protection principles detailed in Sections 3, 4 and 5

- The fact that Capgemini grants easy access to the UK Data Controller BCR, as detailed in Section 16;
- The rights of access, rectification, erasure, restriction, objection to processing, portability and the right not to be subject to decisions solely based on automated processing granted to Data Subjects, as detailed in Section 5;
- The obligation, for each Capgemini Company, to inform the UK DPO who will in turn notify the ICO as well as Capgemini headquarters, in case of a conflict between the local legislation and the UK Data Controller BCR, as detailed in Section 14;
- The right for Data Subjects to complain, including with regard to Capgemini Companies' breaches of any and all aspects of these UK Data Controller BCR, through the internal complaint mechanism of Capgemini, as detailed in Section 7;
- The duty for Capgemini to cooperate with the ICO, as detailed in Section 15;
- The rights for Data Subjects to lodge a complaint with the ICO and/or before the competent courts of law in the UK at any time, as detailed in Sections 7 and 13;
- The obligation for each UK Capgemini Company transferring Personal Data to a Non-UK Capgemini Company on the basis of the UK Data Controller BCR, to accept liability for any breaches of the UK Data Controller BCR by the Non-UK Capgemini Company which received the Personal Data, as detailed in Section 12;
- The fact that in case of a breach of the UK Data Controller BCR by a Non-UK Capgemini Company, it is up to the UK Capgemini Company which exported the Personal Data to demonstrate that the recipient (i.e. the Non-UK Capgemini Company) did not breach the UK Data Controller BCR, as detailed in Section 12.

## 7. DATA SUBJECTS REQUESTS HANDLING PROCEDURE

Capgemini has set up a Data Subjects requests handling procedure, allowing Data Subjects to contact the local DPO either to exercise their rights in relation to the Processing of their Personal Data, or to complain of a breach of the Applicable DP Law or of these UK Data Controller BCR.

The Data Subjects requests handling procedure describes to the Data Subjects where and how to express a request and/or complaint, the delays for the reply to the request or complaint, the consequences in case of the rejection of the request or complaint, the consequences if the request or complaint is considered justified, and the right for the Data Subject to lodge a claim before the competent courts or before the ICO at any time.

## 8. CAPGEMINI DATA PROTECTION ORGANISATION

The Data Protection Officers, part of the Data Protection organisation described in Appendix 3, monitor the legal compliance to the Applicable DP Law of the Capgemini Company within their scope, advise in all matters that relate to data protection, implement the global data protection program, handle or advise on Data Breaches and have an active relationship with the local Supervisory Authority.

As part of the Legal function, Global, Regional and Local Data Protection Officers are supported in their task by the local legal teams. The Data Protection Officers report quarterly to the local country board or Executive Committee on privacy related matters such as critical Data Breaches, Data Subject Requests, privacy issues in large deals etc.

In addition to this regulatory role, the Group, Regional and Local DPOs act as business facilitators by validating the Capgemini approach to data protection and data security. The Group, Regional and Local DPO also have a key role in helping the business identify new business opportunities by identifying the gap between the strict data privacy legal requirements with which Capgemini must comply and the requirements defined by clients that might warrant additional offers.

In practice, this means that the Data Protection organisation should be consulted on any and all new projects to ensure that such new projects embed data protection constraints in the design phase. In addition, to support the business further, the Group DPO will provide templates and procedures to make sure that the data protection constraints are taken into account by default in the different offers and services.

The Data Protection Officer network is completed by a network of Data Protection Champions who represent each Group function and each Global Business Line. Data Protection Champions are not part of the legal organisation but were designated amongst Group Functions and Global Business Lines representatives to ensure that the legal constraints and Group guidance are actually reflected at each level of the organisation. More importantly, the Data Protection Champions liaise with the Data Protection organisation to make sure the program properly integrates business needs and expectations.

Finally, it must be noted that the Data Protection organisation works closely with the Group Cybersecurity Officer and the Cybersecurity organisation, as well as with the Procurement and Delivery organisations.

## 9. DATA PROTECTION AWARENESS AND TRAINING

Capgemini has adopted and implemented a mandatory data protection training program to ensure that all Capgemini Employees are aware of and understand the key principles and requirements of data protection, as well as the UK Data Controller BCR.

The training program is articulated around the following pillars:

- General Training: A common core knowledge describing the applicable principles when Processing Personal Data;
- Practical Training: An overview of the existing applicable policies and processes;
- Functions Training: Tailor-made training designed to address the needs of specific functions (such as HR or marketing for instance).

In addition to the mandatory training, Capgemini is committed to promoting the implementation of data protection principles within the Group's organisation through a set of privacy by design policies and communication actions dedicated to raising awareness among the different Capgemini communities.

## 10. PRIVACY BY DESIGN

Each Capgemini Company is responsible for and able to demonstrate compliance with the UK Data Controller BCR and Applicable UK DP Law in general.

### 10.1 Record of Processing Activities

Capgemini must keep and maintain, in writing, a record of Processing containing the following information:

- The name and contact details of the Capgemini Company acting as Controller, the DPO, and where applicable the joint Controller;
- The purposes of the Processing;
- A description of the categories of Data Subjects and of the categories of Personal Data;
- Where applicable, Transfers of Personal Data to countries located outside the UK, including the identification of such countries;
- Where possible, a general description of the technical and organisational measures implemented.

Capgemini shall make the record available to the ICO upon request.

*In practice, to comply with this requirement, Capgemini uses a dedicated tool which allows it to digitally record all Personal Data Processing and extract a complete record of Processing for its Controller's activities.*

### 10.2 Data Protection Impact Assessment

Capgemini must comply with the obligation to carry out Data Protection Impact Assessments where a Personal Data Processing presents risks to the rights and freedoms of a Data Subject.

In practice, this means that Capgemini shall implement a DPIA Policy designed to identify the risks of a Processing and, depending on the severity of such risk, either launch a DPIA or not. The decision to carry out a DPIA will rest on several factors, including the criteria and the lists identified by the ICO.

The DPIA process is described in a DPIA Policy and is articulated around 4 steps:

1. The description of the Processing
2. Assessing the necessity and proportionality of the Processing
3. Risk Assessment
4. Risk mitigation

Where the DPIA shows that, despite mitigating measures taken by Capgemini, the Processing still presents a residual high risk for the rights and freedoms of Data Subjects, the ICO will be consulted prior to such Processing taking place.

## 11. AUDITS RELATED TO THE UK DATA CONTROLLER BCR

Capgemini must carry out data protection audits covering all aspects of the UK Data Controller BCR, including methods of ensuring corrective actions will take place, on a regular basis.

The audits shall be carried out either by internal or external qualified and independent auditors according to a schedule developed by the Group DPO on a yearly basis. In addition, the Global, Regional and Local DPOs can request that additional audits be carried out. Such audits may cover specific applications, IT systems or databases that process Personal Data; or may be carried out for an entire geography.

The audit report, including the proposed corrective actions to address and mitigate the risks, must be communicated to the data protection organisation and to the top management and shall be made available to the ICO upon request.

In addition, the ICO may conduct data protection audits on any Capgemini Company without any restriction.

## 12. CAPGEMINI'S LIABILITY IN CASE OF A BREACH OF THE UK DATA CONTROLLER BCR

Where a UK Capgemini Company is Processing Personal Data under this UK Data Controller BCR, it shall be liable, towards Data Subjects, for any breaches of the UK Data Controller BCR caused by such UK Capgemini Company. Should a UK Capgemini Company be unable to assume the responsibility of a breach of the UK Data Controller BCR it caused, Capgemini UK plc will ultimately be responsible to remedy such breach.

Capgemini UK plc shall assume liability for breaches of this UK Data Controller BCR by a Non-UK Capgemini Company.

In practice, this means that, under the UK Data Controller BCR, the UK Capgemini Company identified as bearing the responsibility according to the information mentioned above, or Capgemini UK plc, must accept responsibility for paying compensation and to remedy the breach where it has caused material or non-material damage to a Data Subject.

In addition, it shall be up to Capgemini to demonstrate that it did not breach the UK Data Controller BCR.

Capgemini UK plc shall ensure that adequate steps are taken to address violations of the UK Data Controller BCR by a Non-UK Capgemini Company.

## 13. JURISDICTION

In case of a breach of any rights guaranteed under the UK Data Controller BCR, Capgemini encourages Data Subjects to use the dedicated complaint handling procedure described in Section 7.

However, Data Subjects are also entitled to lodge a complaint before the ICO at any time.

In addition, Data Subjects can lodge a complaint before the competent court of law in the UK at any time.

Where the Processing is carried out by a Non-UK Capgemini Company, the Data Subject can lodge a complaint before the ICO or the competent UK court against Capgemini UK plc, as if the violation had been caused by Capgemini UK plc.

## 14. APPLICABLE DP LAW AND POTENTIAL CONFLICTS WITH THE UK DATA CONTROLLER BCR

Where Applicable DP Law requires a higher level of protection for Personal Data, it shall take precedence over the UK Data Controller BCR. In any case, Personal Data will be processed in compliance with the Applicable DP Law.

Where a Capgemini Company has reasons to believe that the applicable local legislation prevents it to fulfil its obligations under the UK Data Controller BCR, it will promptly inform Capgemini UK plc as well as the UK DPO, unless prohibited to do so by a law enforcement authority.

In addition, if a Capgemini Company is subject to local legal requirements having substantial adverse effects on the guarantees provided by the UK Data Controller BCR (including binding requests for disclosure of Personal Data), the ICO must be notified, including information about the data requested, the requesting body, and the legal basis for the disclosure, unless prohibited to do so by a law enforcement authority.

If notification and/or suspension of the Transfer are prohibited, Capgemini will use its best efforts to obtain the right to waive this prohibition in order to communicate as much information as it can and as soon as possible and be able to demonstrate that it did so. Capgemini will, in any case, provide the ICO, annually, general information regarding the requests for disclosure of Personal Data it received (e.g. number of applications for disclosure, type of data requested, requester if possible, etc.).

In any case, Transfers of Personal Data to a public authority cannot be massive, disproportionate and indiscriminate in a manner that would go beyond what is necessary in a democratic society.

## 15. COOPERATION DUTIES

Capgemini must cooperate with the ICO.

In practice, this means that Capgemini shall comply with the advice of the ICO and accept to be audited by the ICO upon request. Capgemini shall consider any communication or recommendation from the ICO and comply with any formal decisions or notices issued by the ICO.

## 16. EASY ACCESS TO THE UK DATA CONTROLLER BCR

A public version of the UK Data Controller BCR is made available on Capgemini's website as well as on the Capgemini Intranet.

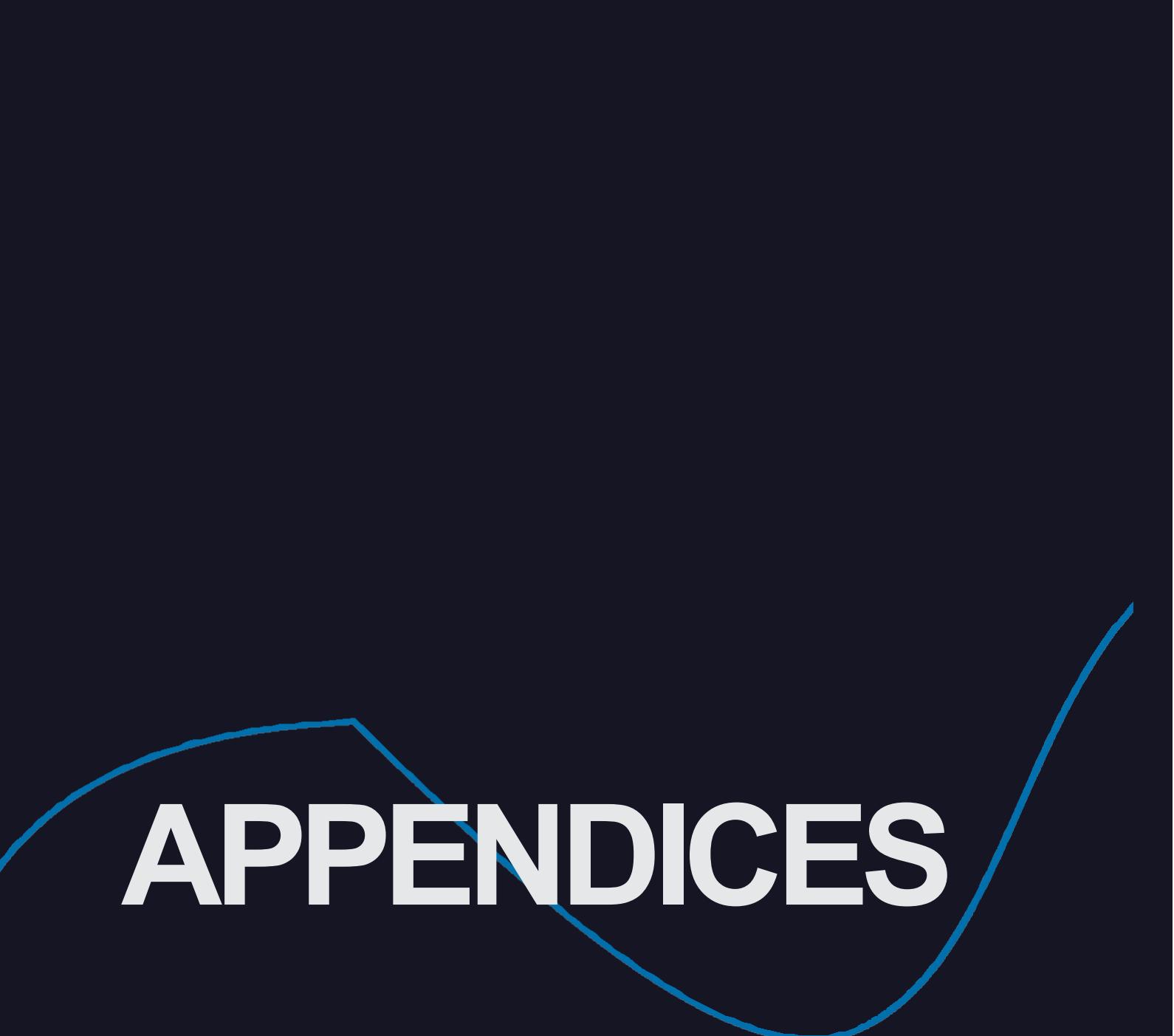
In case of a significant update of the UK Data Controller BCR, Capgemini shall inform the Employees through a communication on the Intranet.

Capgemini shall publish the public version of the UK Data Controller BCR on the company's Intranet and conduct a communication campaign to ensure that Capgemini Employees are made aware of their obligations under the UK Data Controller BCR.

## 17. UPDATES OF THE UK DATA CONTROLLER BCR

Capgemini will communicate changes to this UK Data Controller BCR, including updates to the list of the Capgemini Companies, to the ICO once a year. Capgemini will promptly communicate significant changes, such as changes that could affect the level of protection offered by the UK Data Controller BCR, to the Capgemini Companies and the ICO. When reporting changes to the ICO, Capgemini will include a brief explanation of the reasons justifying the changes.

Capgemini's UK DPO shall maintain an updated list of the Capgemini Companies bound to comply with the UK Data Controller BCR and shall keep track of any updates made to the UK Data Controller BCR. In addition, Capgemini's UK DPO shall notify Capgemini UK Companies of any changes – including administrative changes such as updates to the list of Capgemini Companies. Capgemini's UK DPO shall be the ICO's preferred point of contact and shall be the one communicating the updated list of Capgemini Companies and notifying the ICO in case of any modifications to the UK Data Controller BCR, as detailed above.



# APPENDICES

# APPENDIX 1 - CAPGEMINI COMPANIES BOUND BY THE UK DATA CONTROLLER BCR

Please note that this list is subject to changes and will be updated on a regular basis and communicated to the ICO, at least once a year.

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## APPENDIX 2 – CAPGEMINI PROCESSING ACTIVITIES

### Employee Personal Data

The UK Data Controller Binding Corporate Rules cover Capgemini Employee Personal Data, agency workers and other third parties working on Capgemini's behalf as well as job applicants. The Capgemini Employee Personal Data Capgemini may hold may include but is not limited to:

- Contact details, such as name, date of birth, gender, age, address, telephone numbers, email address, number of children, citizenship, ID details, visa details, work permit details, emergency contact details, dependents details, marital status, life insurance beneficiaries, pictures or images;
- Financial information relating to compensation, benefits and pension arrangements, such as details of salary, bank account, tax codes, travel expenses, stock options, stock purchase plan;
- Recruitment information, such as CV, application form, notes of interviews, applicant references (if recorded), qualifications, test results (if applicable);
- Employment administration information, such as employment and career history, grades, managers, employment contract details, absence records, safety records, health and sickness records, accident reports, personal development reviews, driving license details and associated documents, skills records, government issued identification numbers;
- Professional experience information, such as professional resume, qualifications, details of projects Employees have worked on, training records, mobility records;
- Details of Employees' whereabouts in the Capgemini location to the extent recorded by Capgemini electronic card access systems;
- Details of IT and connection data to the Capgemini IT systems;
- Photos.

Capgemini processes Employee Personal Data exclusively for work-related purposes. Such purposes include but are not limited to the following activities:

- Recruitment, including background checks subject to applicable law;
- Performance assessment and training;
- Pay-roll and administration of other employment-related benefits (including stock options, stock purchase plan, or other corporate plans or benefits);
- Day-to-day management activities, such as deployment on projects, promotion, disciplinary activities, grievance procedure handling;
- Marketing the professional services of consultants to potential Capgemini clients (e.g. by providing details of experience on previous projects);
- Administration of current benefits, including the Capgemini personal pension plan, life insurance scheme, private health insurance scheme;
- Employment analysis, for example, comparing the success of various recruitment and/or Employee retention programs;
- Compliance with health & safety rules and other legal obligations placed on Capgemini as an employer;
- Where necessary, processing designed to enable Capgemini to exercise its legal rights, and/or perform its legal obligations, as an employer, in so far as it is required by Applicable Law of the country where the Capgemini Company responsible for the Personal Data is established;
- IT, security, cybersecurity and access control;
- Human Resource Management, Career management and mobility;
- Internal and external communication;
- Disaster recovery plan and crisis management;
- Company resources management;
- Audit and statistics;

## Business Contacts

Business Contact means a Capgemini supplier, subcontractor, shareholder, client or alliance partner, whether having an on-going commercial relationship with Capgemini or being a former or potential Business Contact of Capgemini. The Personal Data Capgemini may hold about the personnel of its Business Contacts include but is not limited to:

- Contact details, such as name, job title, employer, address, telephone numbers, e-mail address, fax numbers;
- Financial details relating to invoicing and payment, such as bank account information (when the Business Contact is a natural person);
- Relevant experience and/or qualifications (such as for the personnel of subcontractors);
- Details of business interests and opinions (such as where information is held in a CRM marketing database).

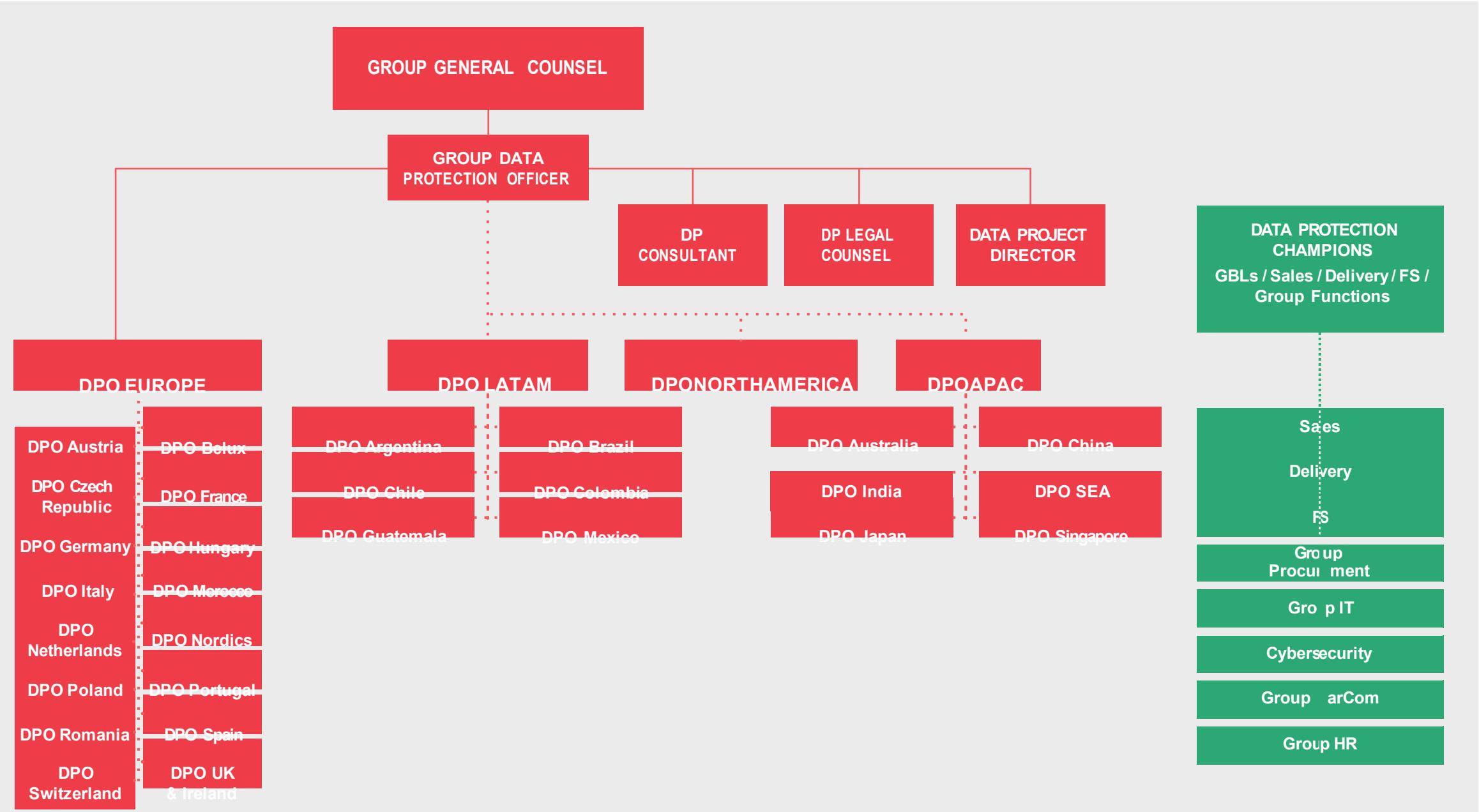
Capgemini processes Business Contact Personal Data exclusively for business related purposes. Such purposes include but are not limited to the following activities:

- Concluding and performing contracts with Capgemini clients, suppliers, subcontractors or alliance partners;
- Managing Capgemini accounts and records;
- Advertising, marketing and public relations;
- Communicating with Business Contacts;
- Market research;
- Health, Security, Environment and Quality;
- Compliance with legal and regulatory obligations;
- Maintaining certifications;
- Audit and statistics.

As a general rule, Capgemini does not collect, or process Special Categories of Personal Data. However, Capgemini may process Special Categories of Personal Data where it is necessary to enable Capgemini to exercise its legal rights, and/or perform its legal obligations, as an employer, in so far as it is strictly required by Applicable Law of the country where the Capgemini Company responsible for the Personal Data is established

As a general rule, Capgemini does not take any individual decisions with significant effect for a Data Subject based solely on automated processing as per article 22 UK GDPR.

## APPENDIX 3 – CAPGEMINI DATA PROTECTION ORGANISATION



## APPENDIX 4 – DATA SUBJECTS’ REQUESTS HANDLING PROCEDURE

### How to exercise your rights?

As we care about your privacy, we want you to be aware of how and why we may collect and further process your Personal Data, and in particular, what are your rights and how to exercise them.

#### Key data protection notions

“**Personal data**” does not only refer to information related to your private life but encompasses any and all information which enables to identify you either directly or indirectly.

“**Processing**” means any operation which is performed on Personal Data, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure, combination, restriction, erasure or destruction.

“**Controller**” means the natural or legal person which determines the purposes and means of the processing of Personal Data.

“**Processor**” means the natural or legal person which processes Personal Data on behalf of the controller.

“**Purpose**” means the reason(s) why the controller needs to collect and further process the Personal Data.

“**ICO**” or the “**Commissioner**” means the Information Commissioner, the UK independent body tasked with upholding information rights (i.e. the UK Data Protection Authority).

Capgemini Service SAS and/or affiliates of Capgemini SE (together referred to as “Capgemini”) collect(s) and further process(es) your Personal Data as Controller or as Processor on behalf of a Controller. In any case, you can contact Capgemini – following the procedure described hereunder – to exercise your data protection rights.

## What are your rights?

As a Data Subject, you can request to exercise the following rights in relation to the Personal Data concerning you that Capgemini collects and further processes:

Please note that these rights may be limited in some situations under UK law. For instance, if granting you access to your Personal Data would reveal Personal Data about another individual; or if you ask Capgemini to delete your Personal Data while it is required by law to keep it.

<b>Access your Personal Data</b>	You can ask Capgemini confirmation as to whether or not Personal Data concerning you are being processed, and where that is the case, you can request access to your Personal Data.
<b>Request the deletion of your Personal Data</b>	In some cases, you can request that Capgemini delete your Personal Data.
<b>Request the rectification of your Personal Data</b>	You can ask Capgemini to rectify inaccurate Personal Data concerning you. This means that you can also request that Capgemini updates or completes your Personal Data.
<b>Object to the processing of your Personal Data</b>	In some cases, you are entitled to ask Capgemini not to process your personal data.
<b>Request the restriction of the processing of your Personal Data</b>	In some cases, you can ask Capgemini to limit the processing of your Personal Data for some purposes and subject to certain conditions.
<b>Request the restriction of the processing of your Personal Data</b>	In some cases, you can ask Capgemini to limit the processing of your Personal Data for some purposes and subject to certain conditions.
<b>Withdraw your consent to the processing of your Personal Data</b>	You can withdraw your consent to the processing of your Personal Data even if you had initially granted such consent for Capgemini to process the Personal Data.
<b>Right to data portability</b>	In some cases, you can ask Capgemini to provide you with your Personal Data in a structured, commonly used and machine-readable format; and/or to transmit those data to another controller.
<b>Submit a complaint</b>	You can also submit a complaint if you consider that Capgemini is infringing applicable data protection regulation(s) or the UK BCR. Please note that you are entitled to obtain redress, and where appropriate, compensation, for a breach of the UK BCR. You may lodge a complaint with the Information Commissioner and/or seek judicial remedy in the competent Court in the UK at any time.

## How to exercise your rights?

To exercise your rights, or if you have any questions or concerns related to our data protection policies, please contact us:

- By emailing us at one of the following address:
  - [dsrr.uk@capgemini.com](mailto:dsrr.uk@capgemini.com); or
  - [dpocapgemini.uk@capgemini.com](mailto:dpocapgemini.uk@capgemini.com)
- By writing to us at one of our UK offices which addresses you can find at the following link: <https://www.capgemini.com/fr-fr/nous-contacter/#undefined>
- By contacting us by phone at the UK Capgemini office of your choosing – which phone numbers are indicated at the following link: <https://www.capgemini.com/fr-fr/nous-contacter/#undefined>

In order to allow us to address your request, please provide us with the following information:

- Your full name\*
- Your status (employee, applicant, etc.)
- Your email address or other preferred means of communication\*
- Identity verification: you may be asked to provide suitable identification documentation
- Country/Region
- The nature of your request\*

\* Without this information, Capgemini will not be able to address your request.

## How will Capgemini handle your request?

Your request will be submitted to the Data Protection Officer for the UK. You will then receive an email acknowledging the receipt of your request. Capgemini shall strive to address your request without undue delay, and no later than 1 month after acknowledging receipt of your request. If your request is particularly complex, or if you sent several requests, the time for a response can be extended by a further 2 months. We would inform you of any such extension within a month after receiving your request.

If you choose to submit your request through electronic means, and unless you request otherwise, Capgemini shall provide you with the information in a commonly used electronic format.

Even though we strongly encourage you to follow this process to submit your request, please note that you can also file a complaint with the Information Commissioner; and/or seek judicial remedy in the competent Court in the UK.

## How will Capgemini address your request?

Once Capgemini has processed your request internally, you will be informed – through the preferred means of communication you indicated – and receive the information relevant to your request. Please find in the table below how Capgemini addresses Data Subjects' most common requests:

<b>Access your Personal Data</b>	Capgemini shall first confirm to you whether or not it is processing your Personal Data; if that is the case, it will provide you with a copy of your Personal Data and all the relevant information on the processing.
<b>Request the deletion of your Personal Data</b>	If the request is justified, the Data Protection Office dealing with your request shall instruct the relevant function(s) to delete your Personal Data.
<b>Request the rectification of your Personal Data</b>	The Data Protection Officer dealing with your request shall instruct the relevant function(s) to rectify your Personal Data; and you shall receive confirmation that your Personal Data has been rectified or updated.

Please note that upon receiving your request, the Data Protection Officer shall perform a first assessment to determine whether:

- Capgemini needs further information to handle your request; or
- your request cannot be handled. In this case, we would explain the reasoning behind our conclusion.

Should Capgemini be unable to answer favorably to your request, you will be notified of such decision including the reason(s) why Capgemini could not accommodate your request. In any case, please note that you can file a complaint at any time with the Information Commissioner; and/or seek judicial remedy in the competent Court in the UK.



## About Capgemini

Capgemini is a global leader in partnering with companies to transform and manage their business by harnessing the power of technology. The Group is guided everyday by its purpose of unleashing human energy through technology for an inclusive and sustainable future. It is a responsible and diverse organization of 325,000 team members in more than 50 countries. With its strong 55-year heritage and deep industry expertise, Capgemini is trusted by its clients to address the entire breadth of their business needs, from strategy and design to operations, fuelled by the fast evolving and innovative world of cloud, data, AI, connectivity, software, digital engineering and platforms. The Group reported in 2021 global revenues of €18 billion.

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