

## Matrix of internal roles and responsibilities

**RACI**

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

Activity	Security Director	Data Processing Officer	Legal Expert (Legal Operations Manager)
<b>ADOPTION OF THE BCR FOR OSF ENTITIES</b>			
Adoption of an Intra-Group Agreement between OSF parent company and OSF Entities regarding the binding character of the OSF Processor BCRs	I	I/C	A/R
<b>MAKING BCR BINDING AMONGST EMPLOYEES</b>			
Translate BCRs into local language when required by national legislation	I	I/A	A/R
Where necessary, prepare Communication pack for Working Groups presentation	A/R	A/R	C
Determination of the local Requirements regarding Working Groups	I	I	A/R
Where necessary, consultation or information regarding BCRs: set up dates and presentations to Working Groups	A	R	R
Where not necessary: communicate broadly to all employees to comply with transparency and information requirements	A (for effective communication) / R (for drafting the communication)	A (for effective communication) / R (for drafting the communication)	R (for effective communication)

(via mailing or through appropriate local bulletin).			
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<b>PRIVACY IMPACT ASSESSMENT</b>				
<b>Activity</b>	<b>Security Director</b>	<b>Data Processing Officer</b>	<b>Legal Expert (Legal Operations Manager)</b>	<b>Operational</b>
Drafting PIA report	A/C	A/C	I	R
Reviewing PIA report	A/R	A/R	I	
Identifying corrective measures if PIA raises alerts	A/R	A/R	I	C
<b>HANDLING CUSTOMERS' COMPLAINTS</b>				
Receive complaints from Customer	A/R	A/R	I	I
Analysis of the complaint	A/R	A/R	C	C
Resolution of the complaint (Answer to the request & Follow up on the request)	A	A/R	A/C/I	A/C/I
<b>REVIEWING DATA PROTECTION CLAUSES</b>				
Reviewing Data Protection clauses in major contracts	C	C	A/R	I
Implementing standard clauses (delivering messages to ask all local lawyers and business to include the clauses and make some random checks at least once a year)	I	C/I	A/R	I

Preparing Data Transfer Agreements	I/C	I/C	A/R	I
Preparing the signing of the Data Transfer Agreements	I	I	A/R	I
Reviewing and approving the security Appendixes to the contracts	A/R	I/C	I	I

<b>DATA PROTECTION TRAINING</b>			
<b>Activity</b>	<b>Security Director</b>	<b>Data Processing Officer</b>	<b>Legal Expert (Legal Operations Manager)</b>
Prepare the training material	A/R	A/R	C
Update the training considering also the various national legal particularities	C	C	A/R
Ensure that DP training is effectively followed by employees at local level	I	A/R	I
Deliver training when needed	A/R	A/R	A/R
<b>HANDLING DATA SUBJECTS' COMPLAINTS</b>			
Receive complaints of Data Subjects	A/R	A/R	I
Analysis of the complaint	A/R	A/R	I
Resolution on the complaint	A	A/R	A/C/I
<b>NOTIFICATION TO DATA PROTECTION AUTHORITIES</b>			
Audit the existing processing at OSF level	A/R	A/R	I
Checking notification status	A/R	A/R	I

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Ongoing monitoring of OSF process notification	A/R	A/R	I
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Performed modification					Modification operator			
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1	Ed.1/Rev.1	All	18-Mar-24	Update Role Titles	Roxana Radulescu		18-Mar-24	
2								
3								
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