

DPO role allocation

MTX STUDIO Ltd, trading as Plinical

Governance record G-2026-09-12 | Prepared 12 September 2026 | For adoption and implementation

1. Decision recorded

On 12 September 2026, Christos Mentis confirmed that he can genuinely take over the product, hosting/security and vendor decisions currently made by Theodoros Mentis, leaving Theodoros to advise and monitor independently as DPO. This record documents that selected route. It does not assert that duties, permissions or working practices have already changed. Complete the adoption and implementation record before treating the conflict action as closed.

Theodoros remains the DPO recorded on the supplied ICO certificate ZC226522. This is a clarification and reallocation of responsibilities, not a new ICO appointment, certification of independence or revocation of his existing designation. No ICO record or external account has been changed.

2. Authority on implementation

Christos Mentis, CEO/Director: takes substantive responsibility for Plinical's product decisions affecting personal data, hosting and security choices, vendor selection and related operational risk decisions. He evaluates the options, makes the actual decision and records the reasons and any DPO advice. He is not merely countersigning decisions already determined by Theodoros.

Theodoros Mentis, DPO: informs and advises the company, monitors compliance, advises on and monitors DPIAs, cooperates with the ICO and acts as a contact for individuals. He does not decide or own the implementation decisions he must independently monitor. DPO advice remains independent; it is not an operational management approval.

Developers and operational personnel: implement decisions within documented authority under Christos's responsibility, provide evidence and raise changes or exceptions. Theodoros must not retain actual determination of the transferred decisions through informal instructions or delegated discretion. Record who performs each affected operational duty; a CIO title must not conceal conflicting retained powers.

3. Limits of this allocation

The transfer concerns MTX's administrative software service and its own business processing. It does not give Christos or MTX authority over a clinic's clinical decisions, treatment purposes or patient-record access. Clinics and self-employed professionals retain their own responsibilities and documented instructions.

The owner-confirmed operating model remains: MTX provides administrative software and has no access to customers' patient/client records or clinical workspaces. Support is by ticket and guidance. This governance record grants no clinic login, impersonation, patient-record access or encryption-key access to either signatory.

Company accountability remains with MTX. Signing this record does not approve vendor health-data use, approve a DPIA, waive unresolved safeguards or authorise production contracting.

Independence and implementation

Required working arrangements

4. Independent DPO function

Theodoros has direct, timely and confidential access to Christos as CEO and to the board where applicable. He can raise concerns without prior management clearance, cooperate with the ICO and be contacted directly by individuals. Management must not instruct his conclusions, suppress his advice or penalise him for carrying out DPO duties.

The company will involve the DPO early in relevant decisions and provide adequate time, training, resources and access to the information needed for the role. The no-clinic-access model is not a reason to deny governance evidence or prevent required DPO tasks. Use appropriate lawful, confidential arrangements without creating general patient-record access through this document.

The DPO records advice, including disagreements. Christos records the company's decision, reasons and follow-up actions, including reasons for not following advice. Such disagreement does not waive legal duties or authorise processing that requires prior ICO consultation. The DPO is not made the owner of company compliance or commercial risk acceptance.

5. Remaining CIO duties and earlier decisions

List and assess all retained CIO and other responsibilities, not just the three transferred areas. Check operational security ownership, deployment/change control, budgets or incentives, retention, marketing and workforce-data decisions where relevant. Remove or reallocate any further duty that causes incompatible decision-making or self-review. A title change, second signature or generic independence statement is not enough.

Theodoros must flag earlier decisions in which he had a material operational role. Christos will arrange a competent review sufficiently independent of the original decision-maker where needed; do not treat Theodoros's review of his own earlier work as independent evidence. Identify the reviewer and scope; this does not automatically require a solicitor or a new full DPIA.

6. Implementation checklist

1. Adopt the allocation through the company's applicable decision process. Record the actual effective date, notify affected staff and update role descriptions and approval responsibilities.
2. Review permissions and workflows against the allocation, including deployment, security and vendor change authority. Document necessary changes and implementation evidence. Do not access patient records to prove separation.
3. Record retained duties, their compatibility, the operational implementers and arrangements for independent review of earlier decisions.
4. Confirm Theodoros's DPO expertise, time, training, resources, confidentiality and direct reporting arrangements. Obtain his acknowledgement and any concerns; do not pre-fill agreement on his behalf.
5. Attach this record to the existing DPIA and release-review file. Update the governance action to 'route selected; implementation pending' until the evidence supports closure. Other DPIA and provider actions remain open on their own merits.
6. Keep the DPO's public contact details accurate. The current contact remains Theodoros Mentis, th.mentis@mtxstudio.com. No appointment or contact change is proposed here. Review compatibility when duties or processing change and at the review date recorded on the next page.

[1] ICO, Data protection officers, checked 12 September 2026: <https://ico.org.uk/DPOs>. Guidance requires compatible duties, independent advice, adequate resources and direct senior-management access; company accountability remains with the controller or processor. This record applies those principles to the owner's selected arrangement but is not an ICO compatibility decision.

Adoption and acknowledgement

Complete with the actual dates and evidence

7. Company adoption

Christos Mentis, CEO/Director: by signing, I adopt the allocation described in this record through my authorised company role. I will exercise the transferred decision-making in practice, ensure implementation and resources, and retain the relevant evidence. The effective date below is the actual date the allocation takes effect, not an assumed preparation date.

8. DPO acknowledgement

Theodoros Mentis, DPO: by signing, I acknowledge the allocation and the independent DPO arrangements. I have identified retained duties and any concerns in the referenced record. My acknowledgement does not certify that every company processing activity is compliant and is not a production or DPIA approval.

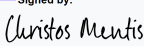
If either signatory needs a change, record it and revise the allocation before signing; do not sign an inaccurate description. Separate authenticated electronic signing or wet signatures may be used. The fillable fields below are ordinary text fields, not cryptographic digital signatures; retain evidence of identity and intention with the executed record.

Actual allocation effective date

Company adoption / decision reference

Christos Mentis - signature

Signed by:


48EB8F5ACB9D49D...

Christos - signature date

Theodoros Mentis - acknowledgement signature

Theodoros - signature date

Retained duties / concerns record reference

Implementation / permissions evidence reference

Implementation status (state any outstanding actions)

Next compatibility review date

Implementation status is separate from adoption. Do not record the conflict action as closed solely because these fields have been filled. Retain the supporting role, permission and review evidence. No signature, effective date, external legal review or implementation completion has been entered by the assistant.