



Webhelp

PROCEDURE FOR DATA PROTECTION ORGANISATION AND GOVERNANCE

Author	Group Data Protection Officer
Owner	Group Data Protection Officer
Organisation	Webhelp
Domain	Privacy
Document reference	GPPrivPro-03
Version	V3.0
Approved	25/05/2018
Effective	25/05/2018
Last Version	17/01/2019
Classification	Public Viewable

Date	Version	Comments

SUMMARY

1. Introduction	3
2. Objectives of the procedure	4
3. Procedures	5
3.1 <i>Group Data Protection Officer (DPO)</i>	5
3.1.1 Reporting line	5
3.1.2 Responsibilities	5
3.1.3 Key missions	5
3.1.3.1 Governance	5
3.1.3.2 Compliance	6
3.1.3.3 Culture	6
3.2 <i>Privacy and data council</i>	6
3.2.1 Responsibilities	6
3.2.2 Composition and organisation	7
3.3 <i>Local privacy leader</i>	7
3.3.1 Reporting line	7
3.3.2 Responsibilities	7
3.3.3 Key missions	7
3.3.3.1 Governance	7
3.3.3.2 Compliance	8
3.3.3.3 Culture	8
3.4 <i>Business privacy referent</i>	8
3.4.1 Reporting line	8
3.4.2 Responsibilities	8
3.4.3 Key missions	8

1. Introduction

The adoption of the Privacy Policy by the Webhelp group and the commitment from the Webhelp entities to comply therewith demonstrates Webhelp's commitment to providing a high level of protection to the Personal Data it processes. Webhelp is committed to conducting business in accordance with the Applicable Data Protection Legislation including the European Regulation 2016/679 relating to the processing of Personal Data as of its date of application, any regulation relating to the processing of Personal Data applicable during the term of the Privacy Policy. As a consequence, Webhelp has implemented the following procedure.

The capitalised terms used herein shall have the same meaning as specified under the Privacy Policy.



2. Objectives of the procedure

As determined in the Webhelp Privacy Policy, Webhelp data protection organisation and governance is organised as described in this Procedure. Such procedure is aimed within Webhelp to provide guidance for the implementation of the Privacy Policy and allow processing of Personal Data in compliance with any Applicable Data Protection Legislation and applicable sectorial and/or local laws.

Principles and organisation determined in the following data protection organization and governance procedure shall allow Webhelp to comply with the above objectives and define roles and responsibilities at both group and local level.

3. Procedures

Webhelp core activities, when acting as a Data Controller or as a Data Processor may consist of Processing operations which, by virtue of their nature, their scope and/or their purposes, require regular and systematic monitoring of Data Subjects on a large scale.

As a consequence, Webhelp has designated a Group Data Protection Officer (DPO") to act on both group and local level and has implemented the following global data protection organization and governance standards.

3.1 Group Data Protection Officer (DPO)

3.1.1 Reporting line

The DPO shall report directly to the highest management level of Webhelp. For this reason, the DPO will be part of the Legal and Compliance department and report to the COMEX level member of the Legal and Compliance Department.

Webhelp guarantees that the DPO does not receive any instructions regarding the exercise of his/her tasks and that he or she will not be dismissed or penalised by the Data Controller or the Data Processor for performing his/her tasks. The Local Privacy Leader may fulfil other tasks and duties.

As a consequence of the above, the DPO shall be bound by secrecy and/or confidentiality concerning the performance of his/her tasks. Such task or duties given to the DPO shall not result in a conflict of interest.

3.1.2 Responsibilities

The DPO shall take responsibilities for defining the data protection compliance program and for advising Webhelp, and any individuals who carry out Processing of their obligations pursuant to the Applicable Data Protection Legislation in relation to any questions relating to data protection.

The appointed DPO shall also be responsible for representing Webhelp before the data protection authorities where appropriate, and shall in this perspective develop strong relations with the competent data protection authorities, including, but not limited to:

- Act as a contact point for the data protection authorities;
- Consult data protection authorities when prior consultation is required;
- Consult data protection authorities where appropriate, with regard to any other matter.

In order for the DPO to provide an effective and appropriate service, Webhelp shall ensure that:

- The DPO is involved, properly and in a timely manner, in all issues which relate to the protection of Personal Data and that;
- Necessary resources are provided to the DPO to carry out his/her tasks and missions;
- The DPO can access Personal Data and Processing operations;
- The DPO will maintain his/her expert knowledge.

3.1.3 Key missions

The missions of the DPO will be articulated around three main pillars: Governance, Compliance and Culture.

3.1.3.1 Governance

- Define and appoint the data protection organisation to support the DPO role in the business units and at local level;
- Coordinate and animate the data protection organisation;
- Define and implement the Privacy Policy;
- Design and implement data protection impact assessment procedures;



- Develop and implement data protection audit procedures to monitor adherence and compliance with Webhelp Privacy Policy;
- Draft internal and external policies, including, but not limited to a data breach procedure and response plan; standard data protection information notices; Data Subjects' complaints handling procedures, a data retention procedure, standard data protection clauses to be implemented within Webhelp and any other procedure deemed necessary;
- Assist the business in negotiating data protection clauses in group contracts

3.1.3.2 Compliance

- Advise and inform Webhelp, and individual who carry out Processing of data about their obligations to comply with Applicable Data Protection Legislation;
- Advise on privacy by design measures to be implemented in projects;
- Advise on products' and services' compliance;
- Advise where data protection impact assessments are required and monitor their performance;
- Cooperate with the data protection authorities where necessary;
- Assist in handling Data Subjects' request of access and complaints;
- When necessary, answer to Data Subjects who contacted the DPO with regard to all issues related to Processing of their Personal Data and to the exercise of their rights under any Applicable Data Protection Legislation.

3.1.3.3 Culture

- Represent Webhelp where required and advocate Webhelp's data protection approach;
- Liaise regularly with the data protection authorities and relay Webhelp position in terms of data protection;
- Define and deliver training on data protection to the different populations and clients of Webhelp;
- Organise internal events and communication to advocate and promote Webhelp' data protection approach.

3.2 Privacy and data council

Taking into account the proliferation of actors, technological complexity, applicable ethical standards, multiple local and sectorial applicable laws and regulations Webhelp acknowledges the need to support the DPO using various internal and external stakeholders to provide information, knowledge and opinion allowing the DPO to his objectives and missions.

3.2.1 Responsibilities

No responsibility of the DPO is delegated, transferred or otherwise granted to the Privacy and Data Council. Opinions of the Privacy and Data Council are nonbinding. The Privacy council shall provide to the DPO all information requested in order to properly evaluate and understand the risks and consequences of any data processing involving directly or indirectly Personal Data within Webhelp.

The Privacy and Data Council will address within its range of expertise:

- Any data protection impact assessments presented to it by the DPO;
- Presentation of the data protection and compliance program and defining the priorities for the implementation of the Data protection governance program;
- Presentation of actions undertaken to ensure the implementation of the data protection compliance program and monitoring the actual implementation of the data protection governance program;
- Decide on actions to be taken to effectively support the implementation of the data protection governance program;
- Proceed with the analysis of request submitted by the Group Data Protection Officer such as re-examination of Data Subject's complaints;
- Presentation of new projects under study at Webhelp for alerting the Privacy and Data Council of potential topics or risks to be addressed;
- Discussion on the Data Protection Strategy for Webhelp;
- Presentation of any global group standard, group recommendation, policy and procedure to be implemented within Webhelp involving Privacy matter.



3.2.2 Composition and organisation

Privacy and Data Council may meet (1) on the DPO request (2) when a notification of a Personal Data Breach to the supervisory authority is required (3) following an internal audit cycle (4) if any permanent member of the Privacy and Data Council requires such meeting.

The Privacy and Data Council shall be composed of:

- The DPO as a permanent member;
- The Group Chief Information Security Officer, if appointed and available, as a permanent member;
- The group Data Director, if appointed and available, as a permanent member;
- The group Analytics Director, if appointed and available, as a permanent member;
- Local Privacy Leaders, if appointed and available, as non-permanent members;
- Any other local, sectorial stakeholder, should they be internal or external, as requested by the DPO. Such stakeholder could be a contractor, subcontractor, adviser, employee, or any other third party whom presence is deemed necessary by the DPO.

Opinion of the Privacy and Data Council are expressed in accordance with the following rules:

- The Privacy and Data Council can vote only if a majority of its permanent members are present. Permanent members cannot delegate their vote;
- Only permanent or non-permanent members are allowed to vote;
- Vote is initiated by the DPO;
- Votes are made on a non-anonymous basis;
- Opinion are approved by the Privacy and Data Council when a majority of the expressed votes are in favour of an opinion.

3.3 Local privacy leader

3.3.1 Reporting line

The Local Privacy Leader will be part of the local Legal and Compliance department or the Security department or Board of the Webhelp Entity.

3.3.2 Responsibilities

The Local Privacy Leader shall take responsibilities for implementing the data protection compliance program as defined by the DPO. The Local Privacy Leader shall in particular be close to the business and shall act as a business facilitator. The Local Privacy Leader may fulfil other tasks and duties.

If required and after DPO approval, the Local Privacy Leader may also be responsible for representing Webhelp before the local data protection authorities. The Local Privacy Leader shall, if responsible for representing Webhelp, develop strong relations with the competent data protection authorities and inform the DPO of any relevant position, and/or decision taken by the local data protection authorities.

3.3.3 Key missions

The missions of the Local Privacy Leader will be articulated around three main pillars: Governance, Compliance and Culture. These missions will take place at a local level and following guidance provided by the DPO.

3.3.3.1 Governance

- Review the Privacy Policy, group standards, group recommendations, procedures in light of local and/or sectorial legal constraints which may apply;
- Implement the Privacy Policy, group standards, group recommendations, procedures or any other document provided by Webhelp;
- Conduct data protection impact assessment and, if deemed necessary, organise a meeting of the Privacy and Data council through the DPO;
- Conduct data protection audits to monitor adherence and compliance with Webhelp Privacy Policy, group standards, group recommendations, policies and procedures;
- Ensure implementation of the Personal Data Breach procedure and response plan;



- Ensure data protection information notices are implemented for local projects;
- Handle Data Subjects' requests and complaints;
- Monitor compliance to the data retention;
- Assist the business in negotiating data protection clauses in all appropriate contracts;
- Act as main point of contact for Business Privacy Referent.

3.3.3.2 Compliance

- Advise and inform Webhelp Entity on the obligations to comply with in terms of data protection and in particular in light of the EU Regulation provisions;
- Advise on privacy by design measures to be implemented in projects;
- Advise on products' and services' compliance;
- Advise where data protection impact assessments are required and monitor their performance;
- Cooperate with the data protection authorities where necessary;
- Assist in handling Data Subjects' request of access and complaints.

3.3.3.3 Culture

- Ensure that training on data protection is delivered at local level;
- Organise internal events and communication to advocate and promote Webhelp data protection approach;
- Organise internal events with Business Privacy Referent.

3.4 Business privacy referent

3.4.1 Reporting line

The Business Privacy Referent will be designated within each business unit and/or department.

3.4.2 Responsibilities

The Business Privacy Referent will take responsibilities for monitoring the data protection compliance programme as defined by the DPO and locally adapted by the Local Privacy Leader. The Business Privacy Referent should in particular be close to the business and shall act as a business facilitator.

The Business Privacy Referent may fulfil other tasks and duties.

3.4.3 Key missions

The missions of the Business Privacy Referent will be to act as a link between internal individuals and the Local Privacy Leader in order to create an efficient privacy network within Webhelp. These missions will take place at a business level and following guidance provided by the Local Privacy Leader.

As a consequence, the Business Privacy Referent shall:

- Implement the Privacy Policy, group standards, group recommendations, policies and procedures or any another document provided by the DPO or the Local Privacy Leader;
- Assist the Local Privacy Leader in Conducting Privacy Impact Assessments;
- Ensure that applicable policies and procedure are implemented when data processing occurs within each line of business;
- Ensure that data protection information notices are implemented for local projects;
- Assist, if required by the Local Privacy Leader, in handling Data Subjects' request of access and complaints;
- Ensure that training on data protection is actually delivered at local level;
- Assist the Local Privacy Leader in Organising internal events and communication to advocate and promote Webhelp data protection approach.

Questions regarding this procedure or knowledge of a violation or potential violation of this procedure must be reported directly to the Group Data Protection Officer.





Think Human

Webhelp SAS
161 Rue de Courcelles
75017 Paris
France
privacy@webhelp.com