



Webhelp

PROCEDURE FOR PRIVACY AWARENESS AND TRAINING PROGRAM

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

1.1 Objectives of the procedure

Protecting Personal Data is not a matter of compliance with privacy laws, but is part of the embodiment of Webhelp core values. In this context, fostering a privacy culture within the group is essential to make all employees, trainees, and other persons whose conduct, in the performance of work is under the direct control of Webhelp accountable for the protection of Personal Data processed as part of Webhelp operations.

A set of data protection and privacy procedures have been developed and implemented by Webhelp to support all of its employees, trainees and any third parties working on behalf of Webhelp in identifying and understanding their responsibilities in these areas. The procedures are aimed to support a culture of awareness and understanding within Webhelp.

Having data protection policies and procedures in place is not useful if employees are not aware and well trained about the principles and procedures which Webhelp has adopted.

The training program shall be articulated around different modules:

- **Module 1 is a general data protection training module** regarding privacy fundamentals targeting all employees, trainees, and other persons whose conduct, in the performance of work is under the direct control of Webhelp regardless of their roles;
- **Modules 2 to 6 are advanced trainings module** focusing on specific privacy requirements for Webhelp global operations and corporate functions and to address specificities of their functions whose roles require a deep professional understanding of privacy requirements in order to be able to take proactive and/or reactive measures in this regard.



2. Procedures

2.1 Global Awareness

Privacy awareness shall be shared and developed as an ongoing standard within Webhelp. Privacy awareness notices and wording may include security reminders and may not be permanently displayed.

The Group Data Protection Officer and each Local Privacy Leader shall determine the wording and notices deemed sufficient in order to provide such privacy awareness.

Privacy notices may include but are not limited to:

- Setting up signs;
- Posters;
- Public notice;
- Displays;
- Wallboards;
- Instruction on Computers;
- Etc;

2.2 General Training

2.2.1 SCOPE

All Webhelp employees, **irrespective of their roles and functions within the group**, whether handling Personal Data or not will be included in the training. External contractors and third parties may also be required to undergo this training if their tasks take them into contact with Webhelp accessible data.

2.2.2 TIMELINE

The Human Resources department will organise mandatory training sessions, online or during a conference or a webinar to all staff member within the following timeline:

- **New Webhelp's staff member shall be provided the general training within six (6) months of hire**, including during the induction training;
- Refresher Training - Webhelp is committed to maintain a high level of security awareness by providing to its staff members reminder regarding privacy rules and pointing out the importance of compliance with Webhelp Privacy Policy - **Webhelp's staff member shall be provided the general training at a minimum, every year.**

2.2.3 CONTENT OF THE GENERAL TRAINING

GENERAL TRAINING

- Understanding the key definitions and concepts embedded in the data protection frameworks;
- Defining the standard rules to comply with when processing Personal Data (i.e. information of Data Subjects, data retention limitation, restrictions on data transfers, etc.);
- Explaining the key obligations employees must be aware of when processing Personal Data;
- Awareness of Webhelp data protection organisation and the Privacy Policy;
- Raising awareness on cyber threats and key security measures to adopt so as to avoid Personal Data breach (e.g., keeping personal information secured etc.);
- Key messages to be shared in relation to Webhelp Data Protection approach.



2.3 Advanced Training

2.3.1 SCOPE

These advanced training modules are designed for employees of Webhelp who have day-to-day responsibilities involving processing Personal Data (e.g., Analytics, Marketing, IT Security, Legal, Human Resources, Procurement, etc.).

2.3.2 TIMELINE

According to his/her role, a member will have to attend the corresponding module in the list below.

This training will focus on case studies to address the specific data protection issues which may be faced by the different functions in the course of their daily work.

The content of the modules may evolve from time to time to take into account technology changes, change of privacy laws and guidance from regulatory and other governing bodies or to reflect Webhelp internal reorganisation (merger and acquisition, domain changes, etc.).

2.3.3 CONTENT OF THE ADVANCED TRAINING

A) HR / FINANCE FUNCTIONS MODULE

HR / Finance Data Protection Module

- Understanding what type of Personal Data can be collected regarding applicants, permanent and temporary employees, leavers, subcontractors and freelancers - taking into account the data minimisation principle specified under the Privacy Policy;
- Understanding information notice requirements for Data Subjects;
- **Learning how to deal appropriately with employees' access requests and** correctly handle a complaint regarding data protection;
- Being aware of the legal **requirements while sending employees' Personal**;
- Data to countries outside the European Union;
- Raising awareness that Data Subjects may request the deletion and/or restitution of their Webhelp Personal Data to anticipate this requirement and ensure the efficiency of the deletion thereof.

B) MARKETING / COMMUNICATION FUNCTIONS MODULE

Marketing / Communication Data Protection Module

- **Apprehending the different aspects related to the definition of "consent"** under the Privacy Policy and knowing when and how it should be obtained from Clients for marketing purposes;
- Understanding what type of Personal Data can be collected regarding Clients taking into account the data minimisation principle specified under the Privacy Policy;
- Learning how to deal appropriately with **Clients' access requests** and correctly handle a complaint regarding privacy;
- Being aware of data protection rules in the context of profiling;
- Raising awareness regarding data protection rules in the context of big data projects.



C) PURCHASE FUNCTION MODULE

Purchase Data Protection Module

- Understanding the requirements of the European Regulation No. 2016/679 dated 27 April 2016 pursuant to which, where working with third parties (e.g., suppliers), Webhelp has to conclude an agreement requiring that the processing of Personal Data by such third parties be done in accordance **with the Applicable Data Protection Legislation (“back to back approach”)**;
- Understanding the standard clauses that Webhelp shall push in its procurement agreements;
- Identifying the point of attention to keep in mind in RFP phases regarding data protection.

D) PROJECT MANAGEMENT FUNCTION MODULE

Project Management Data Protection Module

- Understanding the concept of privacy by design and privacy by default;
- Understanding the requirements of the European Regulation No. 2016/679 dated 27 April 2016 pursuant to which, where working with third parties (e.g., subcontractors), Webhelp has to conclude an agreement requiring that the processing of Personal Data by such third parties be done in **accordance with the Applicable Data Protection Legislation (“back to back approach”)**;
- Learning when and how to conduct a Privacy Impact Assessment;
- **Understanding the principle of “accountability” and the type of information** to be included in the records of processing activities under Webhelp responsibility;
- Understanding the applicable rules regarding Personal Data breach and knowing how to handle such incident (notification to the supervisory authority in accordance with the timeline defined in Webhelp security and privacy incident handling procedure, communication to the Data Subjects, Clients, etc.);
- Being aware of privacy rules in the context of innovative technology projects (e.g., big data, cognitive technologies, IoT, etc.).

E) LEGAL FUNCTION MODULE

Legal Data Protection Module

- Understanding how to use the Privacy Policy and related processes in the context of negotiations;
- Understanding the standard privacy contractual requirements to be pushed by Webhelp with suppliers, subcontractors and Clients (where possible);
- Understanding the extent to which the standard clauses adopted by Webhelp could be amended during negotiations;
- Understanding the applicable rules regarding Personal Data breach and know how to handle such incident (notification to the supervisory authority according to the timeline defined in the Webhelp security and privacy incident handling procedure, communication to the Data Subjects, Clients, etc.).



F) DATA ANALYST AND DEVELOPMENT FUNCTIONS MODULE

Data Analyst and Development Module

- Understanding the concept of privacy by design and privacy by default;
- Understanding the requirements of the European Regulation No. 2016/679 dated 27 April 2016 pursuant to which, where working with third parties (e.g., subcontractors), Webhelp has to conclude an agreement requiring;
- That the processing of Personal Data by such third parties be done in accordance with the Applicable Data Protection Legislation (“back to back approach”);
- Learning when and how to conduct a Privacy Impact Assessment;
- Understanding information notice requirements for Data Subjects;
- Raising awareness that Data Subjects may request the deletion and/or restitution of their Personal Data to anticipate this requirement and ensure the efficiency of the deletion thereof;
- Understanding the principle of “accountability” and the type of information to be included in the records of processing activities under Webhelp responsibility;
- Understanding the applicable rules regarding Personal Data breach and knowing how to handle such incident (notification to the supervisory authority in accordance with the timeline defined in Webhelp security and privacy incident handling procedure, communication to the Data Subjects, Clients, etc.);
- Being aware of privacy rules in the context of innovative technology projects (e.g., big data, cognitive technologies, IoT, etc.).

G) IT & SECURITY FUNCTIONS MODULE

IT & Security Module

- Understanding the concepts of privacy by design and privacy by default, the notion of Personal Data within IT environments as well as the principle of data minimization;
- Understanding the concept of data retention limitation and implementing technical solutions ensuring this principle is observed;
- Being aware that Data Subjects may request the deletion and/or restitution of their Webhelp Personal Data so that IT employees anticipate this requirement and set up the tool so as to allow any deletion of such Personal Data;
- Understanding the obligation of Webhelp to set up appropriate technical measures ensuring security of the Personal Data collected;
- Knowing how to conduct Prior Impact Assessment procedures where required;
- Understanding the rules applicable regarding Personal Data breach and know how to manage such incident (notification to the supervisory authority according to the timeline defined in the Webhelp security and privacy incident handling procedure, communication to the Data Subjects, Clients, etc.).

A) SALES FUNCTION MODULE

Sales Data Protection Module

- Learning how to sell Webhelp approach in terms of data protection;
- Understanding the notion of Transfers of Personal Data and its practical consequences for Webhelp;
- Being aware of the contractual commitments Webhelp can take in relation to the processing of Personal Data;
- Learning how to cooperate with a Client regarding data protection related matters;
- Understanding how to handle a data breach impacting Clients.



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

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