



**PRIVACY AND DATA
PROTECTION POLICY
WEBHELP - AMERICAS**



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1. INTRODUCTION

This Privacy Policy was last updated on December 28, 2022.

This Privacy and Personal Data Protection Policy (hereinafter the "Policy") is a legally binding agreement between the Data Subjects (as defined below) and Webhelp Americas. Therefore, this document governs, among many others, the access and use of any Webhelp Americas website and applications, including the use or attempted use (collectively "its use") of the products and services offered by the latter. In addition, your use of the Webhelp website shall constitute your consent to be bound by this Policy and shall be enforceable in the same manner as if you had signed this document.

When the user, customer, supplier, employee, candidate, and/or a Data Subject (as defined further) provides their Data through any channel or medium established by Webhelp, they authorize the Processing of their Personal Data following the provisions of this Policy.

This Policy applies to all countries where Webhelp Americas provides its services and for all internal processes, and. However, in case of conflict, divergence, and/or inapplicability, the local laws applicable to the processing shall be observed.

2. OBJECTIVE

The group of companies that make up Webhelp Americas (hereinafter jointly referred to as "Webhelp" and/or "Webhelp Americas") recognize the importance of security, privacy, and confidentiality of personal information that users, customers, suppliers, employees, business partners, candidates, and/or third parties may provide and/or transfer to Webhelp, through the various channels provided, such as but not limited to: websites, applications, social networks, physical and/or digital documents.

Because of the foregoing, Webhelp is committed to (i) the adequate protection of the rights of the Data Subjects¹; and (ii) the adequate Processing² of Personal Data³, following the applicable regulations on privacy and protection of Personal Data.

Thus, the purpose of this Privacy (hereinafter the "Policy") is to communicate to the Data Subjects the general framework and parameters of Webhelp's Personal Data Processing.

3. SCOPE

The scope of this Policy is to define and communicate to users, customers, suppliers, employees, candidates, and, in general, to the Data Subjects all the conditions and guidelines applicable to the processing of Personal Data carried out by Webhelp. Furthermore, the above is to strengthen the level of trust between the Controller and the Data Subjects concerning the collection, registration, handling, transfer, and, in general, the Processing ⁴of personal data carried out by Webhelp in the ordinary exercise of its corporate purpose, which includes: (i) relevant information about the Data

¹ As defined later.

² Ibid.

³ Ibid.

⁴ Ibid.

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Controller; (ii) the type of information that will be processed; (iii) the purposes of the Processing; (iv) the duration of the Processing; (v) the applicable security and confidentiality measures; (vi) the rights of the Data Subjects; and (vii) the procedure for making inquiries and claims when so required by the Data Subjects.

4. DEFINITIONS

This Policy is subject to the following terms:

4.1. Authorization or Consent of the Data Subject: Express and informed prior consent of the data subject to process Personal Data. There are certain exceptions to the requirement of this authorization, which vary according to the applicable regulations in each country.

Note: In Brazil's legislation, several legal bases allow the processing of personal data, which include, in addition to the consent of the Data Subject, nine (9) other possibilities ⁵

4.2. Data Protection Authority: It is the authority in charge in each country of monitoring and supervising that in the Processing of Personal Data, the principles, rights, and guarantees of the Data Subjects are respected.

4.3 Privacy Notice: It is the physical, electronic document or in any other known or to be-known format, which is made available to the Data Subject to inform about the Processing of his Personal Data. The Privacy Notice communicates to the Data Subject the information regarding the existence of the information processing policies that will be applicable, the way to access them, and the characteristics of the processing of the Personal Data.

4.4 Database: Organized set of Personal Data that is subject to Processing.

4.5 Assignee: A person that acquires another person's rights through succession or transmission.

4.6 Cookies: these are small text files that web servers place on your device; they are designed to store basic information and help websites and applications recognize your browser. You should consult your web browser(s) to modify your cookie settings. You may lose certain website functions if you delete or do not accept cookies.

4.7 Consultation or request: Refers to the request of the Data Subject or of the people authorized by them and/or by law to know, rectify, update, modify, and/or exercise any right of habeas data related to the information that has been provided to Webhelp and is stored in databases or files.

4.8 Personal Data: Any information linked or that may be associated with one or several determined or determinable natural person(s).

4.9 Sensitive Data: Sensitive data is understood as that which affects the privacy of the Data Subject or whose improper use may generate discrimination, such as that which reveals the racial or ethnic origin, political orientation, religious or philosophical convictions, membership in trade unions, social organizations, human rights organizations or that promotes the interests of any political party or that

⁵ The above is under art. 7 of Law 13709/2018 - General Law on Personal Data Protection of Brazil (GLPD).

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guarantees the rights and guarantees of opposition political parties, as well as data related to health, sexual life, and biometric data.

4.10 ARCO Rights or Rights of the holder of the information or Habeas Data (when applicable):
The right of any person to know, update and rectify the information collected about them in files and data banks of a public or private nature.

4.11 Data Processor: Natural or legal person, public or private, that by itself or in association with others, carries out the Processing of Personal Data on behalf of the Data Controller.

Note: In the regulations applicable in Brazil, the above definition corresponds to the term: Operator.

4.12 Binding Corporate Rules: This is one of the legal mechanisms established by law that allows the transfer of information within a Corporate Group.

4.13 Personal Data Protection Officer and/or Delegate and/or Local Data Protection Leader:
This is the natural person who meets the profile established by law and whose function is to monitor and control the Personal Data Processing Policy application.

Note: In the regulations applicable in Brazil, the above definition corresponds to the term: Data Processor (Encarregado de Proteção de Dados).

4.14 Data Controller: Natural or legal person, public or private, who, by themselves or in association with others, decides on the databases and/or the processing of the data.

Note: In the regulations applicable in Brazil, the above definition corresponds to the term: Controller.

4.15 Data Subject(s): Natural person whose Personal Data is the object of Processing.

4.16 Processing: Any operation or set of operations on Personal Data, such as collection, storage, use, circulation, or deletion.

4.17 Data Transfer: This definition varies according to the applicable regulations in each country. In the case of Colombia, it is a communication of data between two controllers, within (national transfer) or outside a country (international transfer).

4.18 Transmission: This definition varies according to the applicable regulations in each country. In the case of Colombia, it is a communication of data by the data controller to the data processor, within (national transmission) or outside a country (international transmission).

4.19 Personal Data Breach of security: Any breach of security resulting in the accidental (voluntary and involuntary) and unlawful destruction, loss, or alteration of Personal Data stored or processed, including unauthorized communication or access to such data.

4.20 Personal Data Security Incident and/or Breach refers to any breach of security codes or the destruction, loss, alteration, theft, unauthorized communication, and/or personal data unauthorized access.



5. APPLICABLE REGULATIONS⁶

Republic of Colombia:	<ul style="list-style-type: none">• Statutory Law 1581 of 2012;• Statutory Law 1266 of 2008;• Decree 1377 of 2013; and• Decree 1074 of 2015.
United States of Mexico:	<ul style="list-style-type: none">• The Federal Law for the Protection of Personal Data of July 5, 2010; and• Regulation of the Federal Law for the Protection of Personal Data (LFPDPP).
Republic of Brazil:	<ul style="list-style-type: none">• Law No. 13,709 of 2018 - General Law of Personal Data Protection (LGPD).• Decree No. 10,474 of 2020• Decree No. 11,202 of 2022
Republic of Panama:	<ul style="list-style-type: none">• Law 81 on Personal Data Protection; and• Executive Decree 285 of 2021.
Republic of Nicaragua:	<ul style="list-style-type: none">• Law 787 of 2012.
Republic of Peru:	<ul style="list-style-type: none">• Law No. 29733 of 2011• Supreme Decree No. 003-2013-JUS of March 21, 2013, approving the Regulation of the Data Protection Law No. 29,733.• Supreme Decree No. 029-2021-PCM approving the Regulations of Legislative Decree No. 1412 of 2018 - Law of Digital Government of the Peruvian State.
United States of America:	<ul style="list-style-type: none">• California Consumer Privacy Act (CCPA);• The Telephone Consumer Protection Act - TCPA• California Privacy Act (CPRCA);• The Virginia Personal Data Protection Act (VCDPA);• Colorado Privacy Act (CPA);• Utah Consumer Privacy Act (UCPA); and• Maryland Privacy Act (PIPA) to the present
Canada	<ul style="list-style-type: none">• The Privacy Act• The Personal Information Protection and Electronic Documents Act (PIPEDA)
Puerto Rico:	<ul style="list-style-type: none">• Citizen Information on the Security of Information Banks Act ("Act No. 11-2005")• Regulation on Citizen Information on the Security of Information Banks ("Regulation No. 7376-2007").• Public Privacy Notification Act" ("Act No. 39-2012")

⁶ The regulations described in this section are those applicable as of the date of the last update of this document. If new rules on Data Protection come into force, these will be understood to be included and applicable by Webhelp, even if they have not been included in this section so far.



	<ul style="list-style-type: none"> Regulation to Implement the Publication of the Privacy Policy in the Handling of Private and Personal Data of Citizens as Collected by Businesses in Puerto Rico ("Regulation No. 8568 - 2015")- DACO
Republic of El Salvador:	<ul style="list-style-type: none"> Personal Data Protection and Habeas Data Law⁷.
Republic of Guatemala⁸:	<ul style="list-style-type: none"> Constitutional provisions related to the rights to recognize human dignity, privacy, intimacy, honor, and the right to data protection or informative self-determination. Jurisprudence of the Constitutional Court.
Republic of Honduras⁹:	<ul style="list-style-type: none"> Constitutional provisions related to the right to habeas data, the right to recognition of human dignity, privacy, intimacy, honor, self-image, inviolability, and secrecy of communications and private documents. Jurisprudence of the Constitutional Court of Honduras

6. GUIDING PRINCIPLES APPLICABLE TO THE PROTECTION OF PERSONAL DATA

The principles set forth below constitute the general parameters that Webhelp applies and safeguards in the exercise of the processes of capture, registration, management, use, and Processing of Personal Data:

- 6.1. Principle of legality in Data Processing:** The Processing of Personal Data shall be carried out within the current legal framework and per the authorization granted by the Data Subject.
- 6.2. Principle of purpose:** The Processing must obey a legitimate purpose following the law, which must be informed to the Data Subject.
- 6.3. Principle of freedom:** Processing may only be carried out with the Subject's prior, express, and informed consent. Personal Data may not be obtained or disclosed without prior authorization or in the absence of a legal or judicial mandate that relieves the consent.
- 6.4. Principle of truthfulness and quality:** The information subject to Processing must be truthful, complete, accurate, updated, verifiable, and understandable. Processing partial, incomplete, fractioned, or misleading data is prohibited.

⁷ In May 2021, the president vetoed El Salvador's data protection bill and sent it back to the legislature for consideration. So far, this law has yet to be in force.

⁸ There is no specific law on personal data as of the date of the last update of this document. However, the general parameters of the general regulations described herein apply, and the Policies and Procedures established for Webhelp.

⁹ Ibid,



- 6.5. **Principle of transparency:** In the Processing, the right of the Subject to obtain from the Controller or the Processor, at any time and without restrictions, information about the existence of data concerning them must be guaranteed.
- 6.6. **Principle of restricted access and circulation:** The Processing is subject to the limits derived from the personal data's nature and the law's provisions. In this sense, the Processing may only be carried out by people authorized by the Subject and/or by the individuals provided for in the law. Personal Data, except for public information, may not be available on the Internet or other means of dissemination or mass communication unless access is technically controllable to provide restricted knowledge only to the Subjects or third parties authorized following the law.
- 6.7. **Security Principle:** The information subject to Processing by the Controller or Processor shall be handled with the technical, human, and administrative measures necessary to provide security to the records avoiding their adulteration, loss, consultation, unauthorized or fraudulent use, or access.
- 6.8. **Principle of confidentiality:** All people involved in the Processing of Personal Data that are not public are obliged to guarantee the confidentiality of the information, even after the end of their relationship with any of the tasks that comprise the Processing and may only provide or communicate Personal Data when it corresponds to the development of the activities authorized by law and under the terms of this.
- 6.9. **Principle of data minimization:** The Processing of Personal Data shall be adequate, relevant, and limited to what is necessary for processing purposes.
- 6.10. **Principle of limitation of the conservation period:** The Processing of Personal Data shall be carried out during the reasonable and necessary time, following the purposes that justify the Processing. Once the purposes of the Processing have been fulfilled, and notwithstanding legal regulations to the contrary, the Personal Data provided shall be deleted.
- 6.11. **Principle of Data protection by design and by default:** The Processing of Personal Data shall be carried out following relevant technical and organizational measures, both when determining the means to be used and at the time of the Processing itself.
- 6.12. **Principle of Accountability:** The processing of Personal Data shall be accredited and supported by records, manuals, policies, guidelines, etc.

7. TRANSFER OF PERSONAL DATA

Webhelp may require the Transfer of Personal Data among the companies that are part of the group and/or to allied companies, including third-party suppliers of products or services. For these purposes, the Processing or Transfer of information must respect the legal requirements on the matter, such as the adequacy levels of each country, corresponding legal safeguards, Binding Corporate Rules, as well as our internal Policies and Procedures at the internal level.

In any case, the Transfer will be made with the previous subscription of the documents and/or legal safeguards necessary to ensure the confidentiality of the information, following the applicable local

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regulations. Likewise, in compliance with legal duties, Webhelp may provide personal information to judicial or administrative entities.

8. ACCURACY AND UPDATING OF PERSONAL DATA

Webhelp users, customers, suppliers, employees, and candidates are required to provide truthful and accurate personal information and keep it updated in order to facilitate the provision of contracted and/or provided services, as well as any other required services.

Webhelp assumes that the information provided by its users, customers, suppliers, employees, and candidates is truthful, and thus, Webhelp assumes that the information is up to date. Webhelp will not assume the obligation to verify the identity of these individuals or the truthfulness, validity, sufficiency, or authenticity of their data. Webhelp will not be held responsible for any damages or losses of any kind that may result from the lack of truthfulness, validity, sufficiency, or authenticity of personal information and data, including damages resulting from homonymy or identity theft.

9. IDENTIFICATION OF THE CONTROLLER OF THE INFORMATION

Where Webhelp is a data controller, depending on the country, the affiliates acting as data controllers are as follows:

9.1 Republic of Colombia:

9.1.1 ONELINK S.A.S.:

- NIT: 900.964.443-0
- Address: Centro Comercial Aventura, Piso 7, Carrera 52#65-91, Medellín, Colombia.
- Phone: (+604) 3565471
- E-mail: proteccion.dedatos@webhelp.com

9.1.2 GETCOM COLOMBIA S.A.S.:

- NIT: 900.596.020-1
- Address: Diagonal 55 # 37-41, Medellín, Colombia.
- Phone: (+604) 4443820
- E-mail: proteccion.dedatos@webhelp.com

9.1.3 EXPERTS COLOMBIA S.A.S

- NIT: 900.801.459-9
- Address: Carrera 52#65-61, Medellín, Colombia
- Phone: (+604) 3565471
- E-mail: proteccion.dedatos@webhelp.com

9.1.4 GETCOM SERVICIOS S.A.S.:

- NIT: 900.733.568-1
- Address: Diagonal 55 AV. 37-41, Bello, Antioquia.
- Phone: (+604) 4443820
- E-mail: proteccion.dedatos@webhelp.com

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9.1.5 ONELINK INTERNATIONAL S.A.S.:

- NIT: 901.443.600-9
- Address: AC 19 #28-80, Bogotá D.C.
- Phone: (+604) 4443820
- E-mail: proteccion.dedatos@webhelp.com

9.2 United States of Mexico:

9.2.1 ONELINK MEXICO S.A. DE C.V.

- OME180514IG2
- Address: BOULEVARD 300 ENTRE CALLE CDA MEZTISOS - VILLAS DEL REY - CAJEME- OBREGÓN SONORA- MÉXICO. CIUDAD DE OBREGÓN
- E-mail: proteccion.dedatos@webhelp.com

9.2.2 ONELINK SERVICIOS S.A. DE C.V.

- OSE180514FS7
- Address: BOULEVARD 300 ENTRE CALLE CDA MEZTISOS - VILLAS DEL REY - CAJEME- OBREGÓN SONORA- MÉXICO. CIUDAD DE OBREGÓN
- E-mail: proteccion.dedatos@webhelp.com

9.2.3 WEBHELP MEXICO, S. de R.L. de C.V.

- WME200130D21
- Address: Lic. Jose Benitez #2450 , Piso 1, Oficina 102 ,Colonia Obispado, C.P. City of Monterrey, Nuevo León
- E-mail: proteccion.dedatos@webhelp.com

9.3 Republic of Panama:

9.3.1 ONELINK HOLDINGS S.A.

- 2607715-1-834830 DV 47
- Address: Scotia Plaza, 11th Floor, Federico Boyd Ave., and 51st Street, PO Box 0816-03356 Panama, Rep. of Panama. Ciudad de Panamá
- E-mail: proteccion.dedatos@webhelp.com

9.4 Republic of Peru:

9.4.1 WEBHELP PERÚ SAC

- RUC: 20606433329
- Address: Calle Santa Inés Nro. 115, Urbanización Industrial Santa Rosa, distrito Ate. Perú
- E-mail: proteccion.dedatos@webhelp.com

9.4.2 BPO CONSULTING SAC



- RUC: 20525011993
- Address: Jirón Marcos Farfán, nº 3468. Lima
- E-mail: proteccion.dedatos@webhelp.com

9.4.3 KAYNI.COM SAC

- RUC: 20605137556
- Address: Av. Petit Thouars Nro. 4635 Int. 202, urb. Barboncito, distrito Miraflore
- E-mail: proteccion.dedatos@webhelp.com

9.5 Republic of Guatemala:

9.5.1 ONELINK SOLUTIONS GUATEMALA S.A.

- 9001925-3
- Address: 15 Avenida 17-40 zona 13, Torre 1, Nivel 1 Edificio Tetra Center, Ciudad de Guatemala
- E-mail: proteccion.dedatos@webhelp.com

9.5.2 ONELINK GUATEMALA S.A.

- 8715199-5
- Address: 15 Avenida 17-30 Zona 13, Oficina 201, Guatemala, Guatemala
- E-mail: proteccion.dedatos@webhelp.com

9.5.3 INVERSIONES XPERTS GUATEMALA S.A.

- 8745112-3
- Address: 15 Avenida 17-40 zona 13, Torre 1, Nivel 1 Edificio Tetra Center, Ciudad de Guatemala
- E-mail: proteccion.dedatos@webhelp.com

9.5.4 TRANSACTEL HONDURAS S.A.

- 8019009220240
- Address: Tegucigalpa, Municipio del Distrito Central COL. San Carlos Centro Comercial Los Castaños.
- E-mail: proteccion.dedatos@webhelp.com

9.6 Republic of Nicaragua

9.6.1 ONELINK NICARAGUA S.A.

- J0310000251843
- Address: Barrio Largaespada. B. Largaespada Busto Jose Marti 3 C al Este 1 C al Norte
- E-mail: proteccion.dedatos@webhelp.com

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9.6.2 ONELINK BPO S.A.

- J0310000294585
- Address: Plaza El Sol 2 C. Sur, 1 C. Este, Casa No. 26, Los Robles Managua
- E-mail: proteccion.dedatos@webhelp.com

9.6.3 XPERTS NICARAGUA S.A.

- J0310000301115
- Address: Plaza El Sol 2 C. Sur, 1 C. Este, Casa No. 26, Los Robles Managua
- E-mail: proteccion.dedatos@webhelp.com

9.7 Republic of El Salvador:

9.7.1 ONELINK S.A. DE C.V.

- 0501-140514-101-9
- Address: Avenida Albert Einstein y Bulevar, San Salvador. El Salvador
- E-mail: proteccion.dedatos@webhelp.com

9.7.2 TETEL S.A. DE C.V.

- 0501-180614-101-1
- Address: Avenida Albert Einstein y Bulevar, San Salvador. El Salvador
- E-mail: proteccion.dedatos@webhelp.com

9.7.3 GETCOM INTERNATIONAL S.A. DE C.V.

- 0614-311012-102-1
- Address: Boulevard Los Próceres, Colonia Palermo Edificio Ex Panades, No. 350, Frente a UCA, San Salvador, San Salvador.
- E-mail: proteccion.dedatos@webhelp.com

9.7.4 RH-T S.A. DE C.V.

- 0614-150513-103-1
- Address: Avenida Albert Einstein y Bulevar, San Salvador. El Salvador
- E-mail: proteccion.dedatos@webhelp.com

9.8 Republic of Honduras:

9.8.1 TRANSACTEL HONDURAS S.A.

- 8019009220240
- Address: Tegucigalpa, Municipio del Distrito Central COL. San Carlos Centro Comercial Los Castaños.
- E-mail: proteccion.dedatos@webhelp.com

9.9 United States of America:

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9.9.1 WEBHELP USA GROUP INC.

- Employer Identification number: 87-4717539
- Address: 1111 Brickell Avenue, Suite 11, Miami
- E-mail: proteccion.dedatos@webhelp.com

9.9.2 WEBHELP USA LLC

- EIN: 36-5010499
- Address: 1111 Brickell Avenue, Suite 11, Miami
- E-mail: proteccion.dedatos@webhelp.com

9.9.3 WEBHELP US LLC

- EIN: 87-1493066
- Address: 1111 Brickell Avenue, Suite 11, Miami
- E-mail: proteccion.dedatos@webhelp.com

9.9.4 WEBHELP CALIFORNIA INC

- EIN: 611928634
- Address: 200 Madison Avenue, Suite 1901. New York
- E-mail: proteccion.dedatos@webhelp.com

9.9.5 WEBHELP AMERICAS LLC

- EIN: 831454340
- Address: 80 SW 8TH ST, SUITE 2900. Miami, Miami
- E-mail: proteccion.dedatos@webhelp.com

9.10 Canada:

9.10.1 LES SERVICES WEBHELP INC

- ID: 1227 080 783
- Address: 880 Rue Roy Est, Montréal, Quebec
- E-mail: proteccion.dedatos@webhelp.com

9.11 Federative Republic of Brazil:

9.11.1 SERVICES TECH INOVAÇÃO E TECNOLOGIA EM RELACIONAMENTO LTDA.

- CNPJ: 00.584.567/0001-52
- Address: Rua Marechal Deodoro, 314, 11º andar, Curitiba/PR, CEP 80.010-010
- E-mail: proteccion.dedatos@webhelp.com

10. POLICY CONSULTATION

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Webhelp makes this Policy available to the Personal Data Subjects on its corporate website: www.Webhelp.com and other suitable disclosure means. Likewise, Webhelp may modify it at any time, giving notice on its official website or any of its official communication channels.

11. SUBJECTS' RIGHTS

The Subjects of Personal Data shall enjoy the following rights and those granted to them by law:

- 11.1 Know, update, and rectify your information and personal data before the Controller or Processor in charge of the Processing of your information and Personal Data;
- 11.2 Request proof of the authorization granted to the Data Controller, except when expressly exempted as a requirement for the Processing;
- 11.3 To be informed by the Controller or the Data Processor, upon request, regarding the use made of their Personal Data;
- 11.4 Access to information and Personal Data that have been subject to Processing, upon request to Webhelp, under the terms of the applicable regulations in force;
- 11.5 Submit before the Data Protection Authorities complaints for infringements to the Personal Data protection regime applicable to them;
- 11.6 To limit or oppose, at any time, the Processing of their Personal Data before the Controller or Data Processor. In case of requesting the limitation, the Controller shall obtain a new authorization from the Subject;
- 11.7 Request to the Data Controller, the portability of the Personal Data provided to them and to transfer them to another Data Controller;
- 11.8 To revoke the authorization and/or request the deletion of the data when the Processing does not respect the constitutional and legal principles, rights, and guarantees. The revocation and/or deletion shall proceed when the Personal Data Protection Authority has determined that in the Processing, the Controller or Processor has incurred behaviors contrary to the law. Notwithstanding the foregoing, the Subject may request the deletion of the data when: (i) the Processing is no longer necessary according to the purposes for which they were collected; (ii) the Processing Authorization is revoked; and (iii) they oppose to the Processing;
- 11.9 Access free of charge to their Personal Data that has been the object of Processing; and
- 11.10 Subjects' rights according to the applicable regulations.

12 PROCEDURE FOR EXERCISING THE RIGHTS OF THE SUBJECTS

Information subjects may contact Webhelp to exercise their rights through inquiries, requests, and complaints, including their full name, residential address, e-mail address, and telephone number, along with the reason for the request.



This policy defines the general procedure for the exercise of rights by the Data Subjects without prejudice to the application of specific requirements and guidelines that the local laws of each territory may contemplate. In case of discrepancy between the general procedure and the particular stipulations or procedures contained in the applicable local rules, the specific terms stipulated by the corresponding legislation shall prevail.

12.1 MEANS FOR SENDING THE REQUEST (mail, counter, fax, and/or e-mail).

Requests may be submitted in writing, physically and/or digitally, depending on the country where it is made, through the channels enabled by the Organization, which are mentioned in chapter 9 of this document, except for the e-mails mentioned therein.

For all affiliates and subsidiaries that make up Webhelp Americas, the main way to send requests regarding personal data protection is by e-mail to: proteccion.dedatos@webhelp.com

For Colombia, the means of sending the request are the following:

(i) In person, either verbally or in writing, in the physical spaces designated by Webhelp for such purposes, such as the offices at Calle 63 # 24 - 80 in Bogotá - Colombia.

ii) By telephone, at the following telephone number: (+57) 4 444 38 20

iii) By e-mail to: proteccion.dedatos@webhelp.com

12.2 HOW TO SUBMIT A REQUEST

- The Data Subject and/or whoever exercises the right on their behalf must accredit its identity to avoid loss, consultation, unauthorized or fraudulent use or access by a person other than the Data Subject and/or who does not have a legal mandate to act on behalf of the Data Subject.
- The accreditation by the Data Subject will be done by sending a physical or digital copy of the relevant identification document according to the means of presentation of the consultation.
- When the request is made by a person other than the Data Subject, the third party must duly prove the legal capacity or mandate to act on behalf of the Data Subject by sending the supporting documents.
- The request to exercise any of the above rights must be submitted in writing, physically and/or digitally through the channels enabled by the Organization for this purpose and identified in this Privacy Policy.
- The request for the exercise of any of the rights mentioned above must contain at least the following information:
 - Name of the Interested Party, his representative and/or the person exercising the right on his behalf, and identification number.

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- Specific, precise, and justified request for consultation and the right invoked.
- Physical and/or electronic address for notifications.
- Documents supporting the request (if applicable).
- Signature of the petitioner under the medium of the request.

The area and/or delegate in charge within the organization will handle the request to protect personal data only when the identity can be accredited and the requirements mentioned above are met.

12.3 REQUEST PROCESSING

If the request is incomplete, Webhelp Americas will require the interested party to correct the faults within five (5) business days following the date of receipt.

The applicant must submit the required information within two (2) months following the request; if the applicant fails to do so, it will be understood that they have abandoned the request.

The maximum term Webhelp Américas has to respond to the request is fifteen (15) business days from the day following the date of receipt. When it is not possible to respond to the request within that period, the interested party will be informed of the reasons for the delay and the date on which the request will be answered to, which may not exceed eight (8) business days following the expiration of the first period.

Note: The maximum term for responding to requests in Brazil is 15 calendar days.

13. DUTIES OF WEBHELP AS DATA CONTROLLER AND/OR DATA PROCESSOR

13.1 Webhelp, as the Controller of Personal Data, will comply with the following duties:

- a) To guarantee, at all times, the whole and effective exercise of the Data Subjects' rights;
- b) To request and keep a copy of the respective authorization granted by the Data Subject;
- c) Properly inform the Data Subject about the purpose of the collection and the rights they are entitled to by the authorization granted;
- d) Keep the information under the necessary security conditions to prevent its adulteration, loss, consultation, use, or unauthorized or fraudulent access;
- e) Guarantee that the information provided to the Data Processor is truthful, complete, accurate, updated, verifiable, and understandable;



- f) If applicable, inform the Data Processor of any rectification, suppression, or limitation of the Processing made by the Data Subject;
- g) To ensure that only Personal Data that is necessary for each of the specific purposes of the Processing is used;
- h) Update the information, communicating promptly to the Data Processor all developments with respect concerning previously provided and take other necessary measures to ensure that the information provided to it is kept up to date;
- i) Rectify the information when it is incorrect and communicate the pertinent to the Data Processor;
- j) To provide to the Data Processor, as the case may be, only data whose Processing is previously authorized following the provisions of the applicable regulations;
- k) When a Processor carries out the Processing, Webhelp shall choose the one that offers sufficient guarantees following the provisions of this Policy;
- l) Sign with the Data Processor a personal data processing agreement and/or the document that takes its place, which establishes, without limitation, the obligations and rights of the Data Controller, the purpose, duration, nature, and types of Personal Data to be processed, the purpose of the Processing and the commitment to process the Personal Data by the Law and this policy;
- m) Always to always require the Data Processor to respect the security and privacy conditions of the Data Subject's information and the Data Subject's rights.
- n) To process queries and claims formulated under the terms outlined in this Policy;
- o) Adopt an internal manual of policies and procedures to ensure proper compliance with the law and, in particular, to deal with queries and complaints;
- p) To inform the Data Processor when certain information is under discussion by the Data Subject once the claim has been filed and the respective process has not been completed;
- q) Inform the Data Subject's request about the use given to its data;
- r) To inform the Data Protection Authority when there are violations of the security codes, and there are risks in the administration of the information of the Data Subjects;
- s) Comply with the instructions and requirements given by the Data Protection Authorities.

13.2 Webhelp, as Data Processor, shall comply with the following duties:

- a) Process the Personal Data following the instructions of the Controller and the Authorizations of the Data Subjects;
- b) Inform the Controller of any security incident that affects the integrity of the Personal Data; and

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- c) To assist the Controller in the steps that, according to the applicable regulations, correspond to it.

14. PROCESSING OF PERSONAL DATA

The information contained in Webhelp's databases is subject to different forms of , such as collection, exchange, updating, processing, reproduction, compilation, storage, use, systematization, and organization, all partially or totally in compliance with the purposes set forth herein. The information may be delivered, processed, or transferred to public entities, commercial partners, contractors, affiliates, and subsidiaries, as long as it complies with the purposes referred to in this document and the applicable regulations.

Webhelp is committed to the protection, security, and confidentiality of Personal Data and other information of its users, customers, suppliers, employees, and candidates.

For these purposes, Webhelp has information security policies, procedures, standards, and strategies tailored to the particular needs and type of information, which may change at any time at its discretion, and whose objective is to protect and preserve the integrity, confidentiality, and availability of the information and Personal Data, regardless of the medium or format where they are located, their temporary or permanent location, or how they are processed.

In this sense, Webhelp relies on technological security tools and implements industry-recognized security practices, including the processing and storage of sensitive information through secure mechanisms, such as encryption, use of secure protocols, securing technological components, restricting access to information to authorized personnel only, information backup, secure software development practices, among others.

Every Webhelp contract with third parties (contractors, external consultants, temporary collaborators, etc.) that involve the processing of information and personal data of our users, customers, suppliers, employees, and applicants, includes a confidentiality agreement that details their commitments to the protection of their confidentiality, integrity, and privacy.

15. PURPOSES OF THE PROCESSING

The collected information and Personal Data is used to process, confirm, fulfill, and provide the services acquired, directly and/or with the participation of other allied companies or third-party providers of products and services of Webhelp. Additionally, the Personal Data will be processed to promote and advertise the activities and services of Webhelp, carry out financial transactions of payments or collections, attend legal procedures, make reports or attend requests from administrative, control and monitoring authorities (national or international), police authorities, judicial authorities, banking entities, and/or insurance companies (for internal and/or commercial administrative purposes), market research, audits, accounting reports, statistical analysis, billing tasks, fraud identification and money laundering prevention, among others.

a. Processing of Personal Data of Employees and Candidates:

The information collected by Webhelp from its employees is primarily for the following purposes:

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- i. To store the Personal Data of employees, including those obtained in the course of the selection process;
- ii. To comply with the obligations imposed by applicable labor law on employers and to comply with the orders issued by the competent authorities for such purposes;
- iii. Issue certifications regarding the employee's relationship with Webhelp;
- iv. To comply with the obligations and the Management System for Occupational Health and Safety at Work;
- v. To manage the functions performed by workers;
- vi. Contacting family members in case of emergency;
- vii. Collect, store, use, delete, update, circulate, transfer, or process the Personal Data to carry out the business purposes of Webhelp;
- viii. Contacting the Data Subject by telephone, electronic means, SMS, or chats, to conduct surveys, job offers, studies, and/or confirmation of Personal Data;
- ix. Conduct selection processes to gain access to a job, remain in a position, or apply for any other job within Webhelp;
- x. Conduct socio-demographic, segmentation, and professional profiling studies for welfare, retention, and human talent management purposes and participate in training, awards, bonuses, contests, raffles, and other events organized by Webhelp;
- xi. Verify personal, family, financial, credit, commercial, and labor information, academic level, labor, and social security aspects, etc..;
- xii. To carry out criminal and disciplinary background checks, and those related to the control and prevention of fraud and risks associated with money laundering and financing of terrorism, including verification in risk lists;
- xiii. Send information, surveys, notifications, and documents related to disciplinary processes and promote Webhelp's activities or those of related third parties, conduct surveys and any other activity related to purposes derived from the labor or contractual relationship, and commercial or advertising purposes, through text messages, email, SMS, social networks, among others;
- xiv. Comply with legal duties and contractual commitments, as well as the provisions of the legal system of the country in tax, labor, social security, and protection of Personal Data following applicable law;
- xv. For the transfer Personal Data to clients of the Webhelp Group, provided that it is related to the purposes described herein;

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- xvi. For the transfer Personal Data with the parent company, affiliates, or subsidiaries of Webhelp Group companies;
- xvii. For the Personal Data at a national level or outside the country to third parties with whom the Data Controller has entered into a data processing contract; and/or with whom the Data Controller has a contractual relationship and with whom it is necessary to provide it for the fulfillment of the contracted purpose and with third parties and/or commercial allies for the development of legal and contractual obligations such as personnel selection service companies, surveillance companies, among others;
- xviii. Manage and deliver corporate wellness programs and plan corporate activities;
- xix. Providing information to external quality certifying agencies;
- xx. Provide Personal Data for control and verification by external auditors for bidding and/or contracting processes, including Webhelp clients.

b. Processing of Shareholders' Personal Data:

The information collected by Webhelp from its stakeholders is primarily for the following purposes:

- i. To allow the exercise of the duties and rights derived from the quality of the Shareholder;
- ii. Sending invitations to events scheduled by Webhelp and, in general, contacting the Shareholder;
- iii. Issue certifications regarding the relationship of the Data Subject with Webhelp (commercial and credit operations in which the shareholder composition of Webhelp must be known);
- iv. Any others established explicitly in the authorizations granted by the Shareholders.

c. Processing of Customers' Personal Data

Webhelp collects the Personal Data of its customers and stores them in a database that is classified by the company as confidential and will only be disclosed with the express authorization of the Data Subject or when requested by a Competent Authority.

The purposes for which the Personal Data of customers are used are:

- i. Performing the steps for the pre-contractual, contractual, and post-contractual stages;
- ii. Sending invitations to events organized by Webhelp;
- iii. To corroborate any requirement that may arise in the development of the executed contract;
- iv. To comply with the purpose of the contract signed, including correspondence, compliance, and processing of guarantees, among other activities;
- v. Verify cases of noncompliance by any of the parties;

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- vi. Binding in general of each client;
- vii. To carry out customer loyalty activities and marketing operations, in which case the Personal Data may be processed directly or indirectly by the Data Controller or a Data Processor;
- viii. Compliance with tax and legal aspects with government and regulatory entities;
- ix. Manage the administrative, accounting, financial, operational, and logistical aspects associated with fulfilling the contractual object.

15.1. Processing of Suppliers' Personal Data

Webhelp collects Personal Data from its Suppliers and stores it in a database which, although it is mainly composed of public data, is classified by Webhelp as confidential and which, in the case of private data, will only be disclosed with the express authorization of the Data Subject or when requested by a Competent Authority.

The purposes for which the Suppliers' Personal Data are used are:

- 15.1.1. Sending invitations to contract and to take steps for the pre-contractual, contractual, and post-contractual stages;
- 15.1.2. Sending invitations to events scheduled by Webhelp or its affiliates;
- 15.1.3. Conduct evaluations and selection of potential suppliers;
- 15.1.4. Comply with fiscal and legal aspects with government and regulatory entities;
- 15.1.5. Establish business relationships to acquire goods or services
- 15.1.6. Control payments for goods and services received;
- 15.1.7. Manage the administrative, accounting, financial, operational, and logistical aspects associated with the fulfillment of the contractual object;
- 15.1.8. Conduct qualitative and quantitative evaluations of service levels received from suppliers;
- 15.1.9. Communicate policies and procedures on how to do business with suppliers;
- 15.1.10. To carry out accounting control and recording processes of the obligations contracted with suppliers;
- 15.1.11. Conduct consultations, audits, and reviews of the business relationship with suppliers
- 15.1.12. Communicate policies and procedures regarding how to do business with suppliers;
- 15.1.13. Advance accounting control and record processes for obligations contracted with suppliers;

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15.1.14. Conduct inquiries, audits, and reviews arising from business relationships with suppliers.

The collection of Personal Data of suppliers' employees by Webhelp will, in any case, have the purpose of verifying the suitability and competence of the employees.

15.2. Processing of Visitors' Personal Data at the entrance control to Webhelp offices

Webhelp may collect the Personal Data of its visitors and store them in a database qualified by Webhelp as a confidential database, which will only be disclosed with the Data Subject's express authorization or when requested by a Competent Authority.

The purposes for which the Personal Data of those who enter the facilities are used are:

- 15.2.1. Ensure entry to Webhelp's facilities to people who have free transit authorization and restrict passage to those who are not authorized
- 15.2.2. Ensuring security in monitored environments
- 15.2.3. Enable suitable work environments for the safe development of activities within Webhelp.

15.3. Processing of Personal Data from Video Surveillance Records

Webhelp collects biometric data of its workers and visitors through its Surveillance Cameras and stores them in a database that is classified as confidential and will only be disclosed with the Data Subject's express authorization or when requested by a Competent Authority.

The purposes for which the Personal Data contained in the Surveillance Cameras are used are:

- 15.3.1 Ensure safety in work environments;
- 15.3.2 To allow adequate working environments for the safe development of the company's work activities; and
- 16.3.3 Control the entry, stay, and exit of employees and contractors in the company's facilities.

To comply with the duty of information that corresponds to Webhelp as an administrator of Personal Data, Webhelp will implement Privacy Notices in the areas where the capture of images that imply Personal Data Processing is carried out.

16. END OF PROCESSING

The term for processing the information collected by Webhelp Americas may not exceed the term required to comply with the purposes for which it was collected, the term to comply with the corresponding legal and tax obligations, and/or the terms agreed in the respective contracts and agreements signed with customers. Additionally, each country's information retention and filing rules shall be considered. (in the case of Colombia, Law 594 of 2000 General Law of Archives and other

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applicable regulations). The above, with the final objective of archiving information only for the time strictly necessary and eliminating outdated, unnecessary, or useless information.

17. PERSONAL DATA WE PROCESS

17.1. IN OUR ROLE OF CONTROLLERS

Webhelp may collect information and personal data from users, customers, suppliers, employees, and applicants, which may vary depending on the requirements of local authorities, technological facilities, and nature of the product and/or service to be provided, among others, for such purposes, we may collect the following personal information, which may be stored and/or processed in servers located in computer centers, either our own or contracted with third parties, located in different countries.

17.2. IN OUR ROLE OF PROCESSORS

Under the development of its corporate purpose and its main activities, Webhelp processes the end - customers' data as processors, therefore, as a general rule, Webhelp do not decide on the processing of end-customer's personal data, instead, Webhelp process this information on behalf of the controller, following its instructions and using the means designated by them, in compliance with the applicable law in the relevant territories.

Webhelp complies with the necessary technical and organizational security measures to guarantee the confidentiality and integrity of its client's data and to carry out the proper data processing as a data processor by its clients' policies and the regulatory guidelines of each country.

The personal data strategy and data processing policies are defined between the areas responsible for the Governance, Risk, and Compliance (GRC) functions.

17.3 CATEGORIES OF DATA THAT CAN BE PROCESSED

17.3.1. General Identification Data: Name and surname of the user, customer, supplier, employee or applicant, date and place of birth, ID number, gender, marital status, occupation or profession, the relationship concerning minors or disabled people requesting our services, profession, or trade.

17.3.2. Location and/or contact information: postal and/or e-mail address (personal and/or work), nationality or country of residence, nationality, and country of residence, landline, and cell phone numbers for contact (personal and/or work), company where you work and position.

17.3.3. Data related to education level, work experience, personal references, socioeconomic class, status, and financial situation.

17.3.4. Personal information about your health status, the social security entities you are affiliated with, and disciplinary, and judicial records.

17.3.5. Cookies, analytics, and similar technologies:

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From time to time, across Webhelp websites, we collect information through cookies (a small file stored on your device's hard drive), tracking pixels, and data analysis tools, such as Google Analytics, SDK, and other third-party technologies, to obtain information about your general internet usage. The information we collect may include anonymous information such as IP address, geographic location, browser version, the device used, referral data, browser, and platform type, among other information, which is analyzed to save preferences, examine trends, administer the site, track user activity in the aggregate, gather broad demographic information for aggregate use, for reporting purposes (e.g., through aggregate information), and generally to enhance the user experience and provide improved and more personalized service.

This information is processed to understand and improve the quality of the website. However, Webhelp Americas takes all necessary precautions and measures to collect and/or share only statistical data on actions and browsing behavior of our users that do not allow the identification of individuals. Furthermore, personal information collected by these mechanisms will not be used for Spam or the sale of information or any purpose not contemplated in this Privacy Policy by Webhelp Americas' compliance with best practices in security and personal data governance.

- No unique user information (such as name, e-mail address, etc.) will be collected except when the individual precisely and knowingly provides such information.
- Cookie opt-out: In the web browser, the cookie opt-out option allows you to signal to the operators of websites and web applications, and services that you do not want them to track your online activities. Webhelp complies with this cookie-disabling option and does not track, set cookies, or use advertising when this navigation mechanism is in place.

If you wish to delete cookies, follow the navigation instructions to locate the file or folder where the data is stored. You can refuse to accept cookies by activating the setting that allows you to refuse the installation of cookies. However, if you choose this setting, you may be unable to access some parts of our website. In addition, if you do not adjust your browser settings to refuse cookies, our system will send cookies when you connect to our website.

We also have links to social networking sites such as Twitter, Facebook, and LinkedIn. These are third-party websites; therefore, we will not be responsible for the data they collect.

17.3.6. Sensitive data: Webhelp may process sensitive data only following the parameters outlined in the following numeral.

18. PROCESSING OF SENSITIVE DATA

In more special circumstances and only in order to comply with legal and previously established purposes, we may collect data considered as sensitive data, such as data related to health, racial or ethnic origin, political orientation, religious or philosophical convictions, membership in trade unions, social organizations, human rights, personal preferences and/or interests, biometric data, signatures, fingerprints, and other biometric data, as well as images, photographs, videos, voices and/or sounds, video and audio data that identify or make identifiable our users, customers, suppliers, employees and applicants and/or any other data that may be considered as sensitive, fingerprints, and other biometric data, as well as images, photographs, videos, voices and/or sounds, video and audio data that identify or make identifiable our users, customers, suppliers, employees and applicants and/or any individual

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who is or transits in any place where Webhelp has installed equipment and information, as well as devices for the control of movement and surveillance in general. We may also collect data on personal preferences.

The Data Subjects shall not be obliged in any event to authorize the processing of sensitive data or data of minors. Notwithstanding the foregoing, in those cases in which to enable the provision of the service, the Data Subjects provide any sensitive personal data to the COMPANIES, they must expressly consent to Webhelp the processing of the information or sensitive personal data by this Privacy Policy.

Therefore, the Processing of Sensitive Data may only be carried out when the applicable law allows it and with the express authorization of the Data Subject, except for the exceptions provided by law. Furthermore, sensitive Personal Data collected will be stored in databases and/or files specially guarded and with restricted access only to employees who, due to their specific functions, must have access to them to ensure their enhanced protection.

19. PROCESSING OF PERSONAL DATA BY SPECIAL REGULATIONS

This chapter defines Webhelp's general framework and parameters for the appropriate processing personal data when such processing is subject to special rules, laws, and/or regulations. Webhelp operates in different countries, so the local applicable Privacy law, the provisions of the local authorities of each country and region, as well as the applicable international rules and agreements on the matter, shall apply.

19.1 EU GENERAL DATA PROTECTION REGULATION (GDPR):

In cases where the EU General Data Protection Regulation applies, Webhelp will abide by the regulatory requirements it establishes, along with the applicable national and local rules.

For more information, please refer to the global personal data protection policy published at the following link: <https://webhelp.com/news/privacy-policy-bcr/>.

In cases where there is no local regulation on the matter, everything established in this policy and the guidelines and general principles of the GDPR will be respected.

19.2 “THE CALIFORNIA CONSUMER PRIVACY ACT (CCPA)” AND “THE CALIFORNIA PRIVACY RIGHTS ACT (CPRA)”:

Where applicable, the rights of the data subject with respect to personal data will be treated in accordance with the requirements of the California Consumer Privacy Act of 2018 ("CCPA") the California Privacy Rights Act (CPRA).

1. The Data Subjects' rights:

The CCPA and the CPRA provide California residents with the following rights:

- Right to Access. The Data Subject has the right to know what data has been collected about them during the past 12 months, including the following:



- a) The categories of personal information that have been collected;
- b) The categories of sources from which personal information is collected;
- c) The business or marketing purpose for collecting your personal information;
- d) The categories of third parties with whom your personal information has been shared; and
- e) The specific personal information that has been collected; o The categories of third parties with whom your personal data has been shared; and the detailed personal information that has been collected.

• **Right to Delete.** The Data Subject has the right to request the deletion of personal information collected about them. However, there are exceptions to this right which include, among others, when the information is necessary for the data controller, data processor, or a third party to be able to:

- a) Complete a transaction;
- b) Provide you with a good or service;
- c) Execute a contract;
- d) Protect the Data Subject's security and hold those who violate it accountable;
- e) Repair the system in the event of an error;
- f) Protect the Data Subject's rights of freedom of speech or expression
- g) Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et seq.);
- h) Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws;
- i) To comply with a legal obligation; or
- ii) To process the information for other internal and lawful uses of the information that are consistent with the context in which you provided it; or
- iii) To request that your personal information not be sold

• **Other Rights.** You may request certain information about the disclosure of personal information to third parties for direct marketing purposes during the previous calendar year. This request is free of charge and may be made once a year. You also have the right not to be discriminated against for exercising any of the rights listed above.

19.2.2 How we process personal information:

Webhelp processes information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“personal information”).

In most cases, Webhelp collect this information from you on behalf of its customers, who determine what specific categories of data should be provided by you to us.

Webhelp does not sell your personal information. Webhelp may not collect, store, or process data for its account, use, or benefit. Furthermore, Webhelp may not make decisions about how its customers treat or instruct that the personal information of Personal Data Subjects or consumers be treated.

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Finally, Webhelp has an escalation matrix to direct the requests of the Personal Data Subjects in which they exercise the rights outlined in the CCPA to the area or responsible designated by their clients so that they will direct the Personal Data Subjects to the channels established by each client for the attention of such requirements.

19.2.3 Exercising the privacy rights of the Data Subject.

If you have any questions or comments about this notice, access to or deletion of your personal information or to exercise any other data rights under California law, please contact us at the following email address: proteccion.dedatos@webhelp.com

In the request please provide i) your name, ii) a way for Otis to contact you (such as an email address), your relationship to Otis (customer, vendor, a member of the general public) and iii) the specific action you would like us to take. We will verify your identification and determine what personal information we have.

NOTE: This information may be reviewed and updated periodically as implementing regulations are developed and come into force.

20. CHILDREN AND TEENAGERS' PERSONAL DATA

The processing of the Personal Data of children and adolescents shall be carried out exceptionally, considering the purposes of the data processing, the respect for their fundamental rights and their best interest. Likewise, the authorization of the person with parental authority or legal representative will be required.

The Associate and/or third party in charge of processing Personal Data of children and adolescents must put in place special confidentiality and security measures.

The Webhelp website is not intended for children under the age of thirteen (13), and it is recommended that no one under the age of thirteen (13) use it.

In the case of the United States of America, to use the Webhelp Website, you must i) be eighteen (18) years of age or older, have the power to enter into a binding contract with Webhelp, and not be barred from doing so under applicable law; or ii) be thirteen (13) years of age or older and have the consent of the minor's parent or guardian to the Agreement. Likewise, users who enter to the Webhelp Website affirm that they are at least thirteen (13) years of age.

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21. APPLICABILITY AND MODIFICATIONS TO THE PRIVACY POLICY

Webhelp reserves the right to make changes or updates to this Privacy Policy at any time, in response to legislative developments, changes in internal policies, or new requirements for the provision or offering of its services. These modifications will be available to the public before their implementation through the following means: visible announcements in its establishments or on our websites, applications for smartphones or electronic kiosks (Privacy Notice), or through the last email provided.

Subject to applicable law, the Spanish version of this Privacy Policy shall prevail over any version disclosed in another language. In the event of any inconsistency between the Spanish version and any translation of this Privacy Policy in another language, the Spanish version shall prevail.

This privacy policy will be effective as of the date of publication of its latest version, on December 28, 2022.

22. HISTORY OF UPDATES

VERSION	DATE	UPDATE DESCRIPTION
1	2016/09/08	Creation of the personal data processing policy.
2	2017/11/22	Some numerals were modified.
3	2018/03/15	<ul style="list-style-type: none"> • Re-structuring of the applicable policy to the personal data protection laws where OneLink provides their services. • . New applicable laws and regulations are identified and added • . Incorporating the existing document into the integrated management
4	2018/05/07	A procedure is modified to comply with the ES-GE-Tq-I-01 documentary instruction from the management system.
5	2019/01/15	A procedure is modified to include employees, applicants, and pensioners' data processing guidelines.
6	2020/02/06	The Corporate Security Director is included as the responsible user and additional approving officer.
7	2020/07/07	The segment about the "California Consumer Privacy Act" is included.
8	2022/05/19	Onelink term updated by Webhelp Americas.
9	2022/12/28	Comprehensive review and inclusion of new elements generated by the integration of Webhelp Americas (United States, Peru and Brazil), including sections such as sensitive data and data of minors. The process of requests from the owners of the information is detailed.



23. FLOW OF APPROVAL

ELABORATED BY	REVISED BY	APPROVED BY
Name: Daniela Salomé Aristizábal Position: Data Protection Officer Americas	Name: Paola Saavedra Position: Legal and Compliance Director Americas Name: Natalia González Lewis Position: Compliance Manager Americas	Name: Daniela Salomé Aristizábal Position: Data Protection Officer Americas Name: Fernando Moreno Position: Corporate Security Director Americas