



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



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|  | PRIVACY AND DATA PROTECTION POLICY | CÓDIGO: CM-T-R-S-008 |
| | WEBHELP - AMERICAS | VERSIÓN:6 |
| | | EDICIÓN: 28/DIC/2022 |

1. INTRODUCTION

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

This Policy and Webhelp's Terms and Conditions (collectively, the "Agreement") form a legally binding agreement between data subjects and Webhelp Americas. This Agreement governs your access to and use of any Webhelp Americas websites and applications and your use or attempted use of our products and services (collectively, "Your Use"). Your use of the Webhelp website shall be deemed to constitute your consent to be bound by this Agreement and shall be enforceable in the same manner as if you had signed this Agreement.

When the user, customer, supplier, employee, candidate, and/or a Data Subject, 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 in which Webhelp Americas provides its services, and for all internal processes, and in case of any 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"), 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 effective protection of the rights of the Data Subjects; and (ii) the adequate Processing of Personal Data, following the applicable regulations on privacy and protection of Personal Data.

Thus, the purpose of this Privacy and Personal Data Protection Policy (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 Owners, all the conditions and guidelines applicable to the processing of Personal Data carried out by Webhelp. The above is to strengthen the level of trust between the Controller and the Data Owners concerning the collection, registration, handling, transfer, and processing of personal data carried out by Webhelp, in the ordinary exercise of its corporate purpose, which includes: (i) relevant information about the Data 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 Owners; and (vii) the procedure for making inquiries and claims when so required by the Data Owners.

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4. DEFINITIONS.

This Policy is subject to the following terms:

4.1. Authorization or Consent of the Owner: Express and informed prior consent of the Owner 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 authorization and consent of the owner, nine (9) other possibilities

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 Owners 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 Owner 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 that is intended to be given to the Personal Data.

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

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

4.6. Cookies 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. If you delete or do not accept cookies, you may lose certain functions of the website.

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 Teleperformance 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 Owner 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 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 that has been



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 application of the Personal Data Processing Policy.

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 Owner(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 parties responsible for data processing, 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 access of personal data.

5. APPLICABLE REGULATIONS¹

¹ La normativa descrita en esta sección es la aplicable a la fecha de la última actualización del presente documento. En caso de haber entrado en vigor nueva normativa sobre Protección de Datos esta se entenderá incluida y será aplicable por Webhelp, aun cuando hasta el momento no haya sido incluida en esta sección.



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| 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. |
| Republic 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 (CPRA); • 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") • 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 Law. |



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| Republic of Guatemala²: | <ul style="list-style-type: none">• Constitutional provisions related to the rights to the recognition of human dignity, privacy, intimacy, honor, and the right to data protection or informative self-determination.• Jurisprudence of the Constitutional Court. |
| Republic of Honduras³: | <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 Owner.
- 6.2. Principle of purpose:** The Processing must obey a legitimate purpose following the law, which must be informed to the Data Owner.
- 6.3. Principle of freedom:** Processing may only be carried out with the Owner'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. The processing of partial, incomplete, fractioned, or misleading data is prohibited.
- 6.5. Principle of transparency:** In the Processing, the right of the Owner 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 Owner 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 Owners or third parties authorized following the law.

² No hay una ley específica en tema de datos personales a la fecha de la última actualización del presente documento. Sin embargo, aplican los parámetros generales de la normativa general aquí descrita, así como las Políticas y Procedimientos establecidos para Webhelp.

³ Ibidem



- 6.7. **Security Principle:** The information subject to Processing by the Responsible or Responsible Party 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 the purposes for which they are processed.
- 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 at the time of 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. TRANSMISSION AND TRANSFER OF PERSONAL DATA

Webhelp may require the Transmission or 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 Transmission or Transfer of information must respect the legal requirements on the matter, such as the adequacy levels of each country, corresponding legal safeguards, binding business rules at the internal level, etc.

In any case, the delivery, Transmission, or Transfer, will be made before the subscription of the documents and/or legal safeguards that are necessary to ensure the confidentiality of the information, following the applicable local 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's users, customers, suppliers, employees, and candidates are obliged to provide truthful and accurate personal information and keep it updated to enable the provision of the services contracted and/or provided, as well as for other services required.

Webhelp presumes the veracity of the information provided by users, customers, suppliers, employees, and candidates and, therefore, assumes that these are updated, so it will not assume the obligation to verify their identity or the veracity, validity, sufficiency, and authenticity of the data provided by each of them. Likewise, it shall not assume liability for damages and/or losses of any

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nature that may arise from the lack of veracity, validity, sufficiency, or authenticity of the information and personal data, including damages that may be due to homonymy or identity theft.

9. IDENTIFICATION OF THE PERSON RESPONSIBLE FOR THE INFORMATION

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

9.3. Republic of Colombia:

9.3.1. 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: protecciondedatos@onelinkbpo.com

9.3.2. GETCOM COLOMBIA S.A.S.:

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

9.3.3. EXPERTS COLOMBIA S.A.S

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

9.3.4. GETCOM SERVICIOS S.A.S.:

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

9.3.5. ONELINK INTERNATIONAL S.A.S.:

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

9.4. United States of Mexico:

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9.4.1. 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: protecciondedatos@onelinkbpo.com

9.4.2. 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: protecciondedatos@onelinkbpo.com

9.4.3. 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: protecciondedatos@onelinkbpo.com

9.5. Republic of Panama:

9.5.1. 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: protecciondedatos@onelinkbpo.com

9.6. Republic of Peru:

9.6.1. WEBHELP PERÚ SAC

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

9.6.2. BPO CONSULTING SAC

- RUC: 20525011993
- Address: Jirón Marcos Farfán, nº 3468. Lima
- E-mail: protecciondedatos@onelinkbpo.com

9.6.3. KAYNI.COM SAC

- RUC: 20605137556
- Address: Av. Petit Thouars Nro. 4635 Int. 202, urb. Barboncito, distrito Miraflore

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- E-mail: protecciondedatos@onelinkbpo.com

9.7. Republic of Guatemala:

9.7.1. 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: protecciondedatos@onelinkbpo.com

9.7.2. ONELINK GUATEMALA S.A.

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

9.7.3. 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: protecciondedatos@onelinkbpo.com

9.7.4. TRANSACTEL HONDURAS S.A.

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

9.8. Republic of Nicaragua

9.8.1. ONELINK NICARAGUA S.A.

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

9.8.2. ONELINK BPO S.A.

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

9.8.3. XPERTS NICARAGUA S.A.

- J0310000301115

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- Address: Plaza El Sol 2 C. Sur, 1 C. Este, Casa No. 26, Los Robles Managua
- E-mail: protecciondedatos@onelinkbpo.com

9.9. Republic of El Salvador:

9.9.1. ONELINK S.A. DE C.V.

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

9.9.2. TETEL S.A. DE C.V.

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

9.9.3. 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: protecciondedatos@onelinkbpo.com

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

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

9.10. Republic of Honduras:

9.10.1. TRANSACTEL HONDURAS S.A.

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

9.11. United States of America:

9.11.1. WEBHELP USA GROUP INC.

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

9.11.2. WEBHELP USA LLC

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- EIN: 36-5010499
- Address: 1111 Brickell Avenue, Suite 11, Miami
- E-mail: protecciondedatos@onelinkbpo.com

9.11.3. WEBHELP US LLC

- EIN: 87-1493066
- Address: 1111 Brickell Avenue, Suite 11, Miami
- E-mail: protecciondedatos@onelinkbpo.com

9.11.4. WEBHELP CALIFORNIA INC

- EIN: 611928634
- Address: 200 Madison Avenue, Suite 1901. New York
- E-mail: protecciondedatos@onelinkbpo.com

9.11.5. WEBHELP AMERICAS LLC

- EIN: 831454340
- Address: 80 SW 8TH ST, SUITE 2900. Miami, Miami
- E-mail: protecciondedatos@onelinkbpo.com

9.12. Canada:

9.12.1. LES SERVICES WEBHELP INC

- ID: 1227 080 783
- Address: 880 Rue Roy Est, Montréal, Quebec
- E-mail: protecciondedatos@onelinkbpo.com

9.13. Federative Republic of Brazil:

9.13.1. 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: protecciondedatos@onelinkbpo.com

10. POLICY CONSULTATION.

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

The Policy links for Webhelp Americas are as follows:

- **Spanish:** Webhelp.com | [Política de Privacidad Americas](#)
- **English:** Webhelp.com | [Privacy Policy Americas](#)



11. OWNERS' RIGHTS.

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

- 11.3.** Know, update and rectify your information and personal data before the entity Responsible for the Processing or in charge of the Processing of your information and Personal Data;
- 11.4.** Request proof of the authorization granted to the Data Controller, except when expressly exempted as a requirement for the Processing;
- 11.5.** To be informed by the Controller or the Data Processor, upon request, regarding the use made of their Personal Data;
- 11.6.** 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;
- 11.7.** Submit before the Data Protection Authorities, complaints for infringements to the Personal Data protection regime applicable to them;
- 11.8.** 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 Owner, following the limitation requested by the latter;
- 11.9.** Request to the Data Controller the portability of the Personal Data provided to them and to transfer them to another Data Controller;
- 11.10.** 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 Owner 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) he/she opposes to the Processing;
- 11.11.** Access free of charge to their Personal Data that has been the object of Processing; and
- 11.12.** Owners' rights according to the applicable regulations.

12. PROCEDURE FOR EXERCISING THE RIGHTS OF THE OWNERS

Information owners 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.

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

12.1 MEANS OF SENDING THE APPLICATION (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: only dlt-americas-dataprotection@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: dlt-americas-dataprotection@webhelp.com

12.2 HOW TO SUBMIT AN APPLICATION

- The Owner of the information and/or whoever exercises the right on their behalf, must accredit its Ownership 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 Owner 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 Owner, the third party must duly prove the legal capacity or mandate to act on behalf of the Owner by sending the supporting documents.
- The request to exercise any of the aforementioned 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 aforementioned rights 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 request will be handled by the area and/or delegate in charge within the organization for the protection of personal data only when the Ownership can be accredited and the aforementioned requirements are met.

12.3 APPLICATION 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 required information must be submitted by the applicant 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 responded to, which may not exceed eight (8) business days following the expiration of the first period.

Note: In Brazil's case, the maximum term for responding to requests is 15 calendar days.

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

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

- 13.3.1.** To guarantee the Owner, at all times, the full and effective exercise of their rights;
- 13.3.2.** To request and keep a copy of the respective authorization granted by the Owner;
- 13.3.3.** Properly inform the Owner about the purpose of the collection and the rights they are entitled to by the authorization granted;
- 13.3.4.** Keep the information under the necessary security conditions to prevent its adulteration, loss, consultation, use, or unauthorized or fraudulent access;
- 13.3.5.** Guarantee that the information provided to the Data Processor is truthful, complete, accurate, updated, verifiable, and understandable;
- 13.3.6.** If applicable, inform the Data Processor of any rectification, suppression, or limitation of the Processing made by the Owner;



- 13.3.7.** To ensure that only Personal Data that is necessary for each of the specific purposes of the Processing is used;
 - 13.3.8.** 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;
 - 13.3.9.** Rectify the information when it is incorrect and communicate the pertinent to the Data Processor;
 - 13.3.10.** 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;
 - 13.3.11.** When the Processing is carried out by a Processor, choose the one that offers sufficient guarantees following the provisions of this Policy;
 - 13.3.12.** 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;
 - 13.3.13.** Always require the Data Processor to respect the security and privacy conditions of the Owner's information and the Owner's rights.
 - 13.3.14.** To process queries and claims formulated under the terms outlined in this Policy;
 - 13.3.15.** Adopt an internal manual of policies and procedures to ensure proper compliance with the law and, in particular, to deal with queries and complaints;
 - 13.3.16.** To inform the Data Processor when certain information is under discussion by the Owner, once the claim has been filed and the respective process has not been completed;
 - 13.3.17.** Inform at the Owner's request about the use given to its data;
 - 13.3.18.** 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 Owners;
 - 13.3.19.** Comply with the instructions and requirements given by the Data Protection Authorities.
- 14.1.** Webhelp, as Data Processor, shall comply with the following duties:
- 14.2.1.** Process the Personal Data following the instructions of the Controller and the Authorizations of the Owners;
 - 14.2.2.** Inform the Controller of any security incident that affects the integrity of the Personal Data; and

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14.2.3. To assist the Responsible Party in the steps that, according to the applicable regulations, correspond to it.

14. TREATMENT.

The information contained in Webhelp's databases is subject to different forms of treatment, such as collection, exchange, updating, processing, reproduction, compilation, storage, use, systematization, and organization, all of them partially or totally in compliance with the purposes set forth herein. The information may be delivered, transmitted, 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 transmitted.

In this sense, Webhelp relies on technological security tools and implements industry-recognized security practices, including transmission 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.

All Webhelp contracts 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, include a confidentiality agreement that details their commitments to the protection and preservation of the confidentiality, integrity, and privacy of such data.

15. PURPOSES OF TREATMENT.

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

15.3. Processing of Personal Data of Employees and Candidates:

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



- 15.3.1.** To store the Personal Data of employees, including those obtained in the course of the selection process;
- 15.3.2.** 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;
- 15.3.3.** Issue certifications regarding the employee's relationship with Webhelp;
- 15.3.4.** Comply with the obligations and the Management System for Occupational Health and Safety at Work;
- 15.3.5.** Manage the functions performed by workers;
- 15.3.6.** Contacting family members in case of emergency;
- 15.3.7.** Collect, store, use, delete, update, circulate, transfer or transmit the Personal Data to develop Webhelp's corporate purpose;
- 15.3.8.** Contact the Owner by telephone, electronic means, SMS, or chats, to conduct surveys, job offers, studies, and/or confirmation of Personal Data;
- 15.3.9.** Conduct selection processes to gain access to a job, remain in a job, or apply for any other job within Webhelp;
- 15.3.10.** 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;
- 15.3.11.** Verify personal, family, financial, credit, commercial, and labor information, academic level, labor, and social security aspects, etc..;
- 15.3.12.** . 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;
- 15.3.13.** 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;
- 15.3.14.** 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;
- 15.3.15.** Transmit and transfer Personal Data to clients of the Webhelp Group, provided that it is related to the purposes described herein;

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- 15.3.16.** Transmit and transfer Personal Data with the parent company, affiliates, or subsidiaries of Webhelp Group companies;
- 15.3.17.** Transmit 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;
- 15.3.18.** Manage and deliver corporate wellness programs and plan corporate activities;
- 15.3.19.** Providing information to external quality certifying agencies;
- 15.3.20.** Provide Personal Data for control and verification by external auditors, for bidding and/or contracting processes, including Webhelp's clients.

15.4. Processing of Shareholders' Personal Data:

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

- 15.4.1.** To allow the exercise of the duties and rights derived from the quality of Shareholder;
- 15.4.2.** Sending invitations to events scheduled by Webhelp and in general contacting the Shareholder;
- 15.4.3.** Issue certifications regarding the relationship of the owner of the data with Webhelp (commercial and credit operations in which the shareholder composition of Webhelp must be known);
- 15.4.4.** Any others specifically established in the authorizations granted by the Shareholders.

15.5. 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 owner or when requested by a Competent Authority.

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

- 15.5.1.** Performing the steps for the pre-contractual, contractual and post-contractual stages;
- 15.5.2.** Sending invitations to events organized by Webhelp;
- 15.5.3.** To corroborate any requirement that may arise in the development of the executed contract;
- 15.5.4.** To comply with the purpose of the contract signed, including correspondence, compliance, and processing of guarantees, among other activities;

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15.5.5. Verify cases of noncompliance by any of the parties;

15.5.6. Binding in general of each client;

15.5.7. 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;

15.5.8. Compliance with tax and legal aspects with government and regulatory entities;

15.5.9. Manage the administrative, accounting, financial, operational, and logistical aspects associated with the fulfillment of the contractual object.

15.4 Processing of Suppliers' Personal Data

Webhelp collects Personal Data from its Suppliers and stores it in a database which, although it is mostly 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 Owner or when requested by a Competent Authority.

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

16.4.1. Sending invitations to contract and to take steps for the pre-contractual, contractual and post-contractual stages;

16.4.2. Sending invitations to events scheduled by Webhelp or its affiliates;

16.4.3. Conduct evaluations and selection of potential suppliers;

16.4.4. Comply with fiscal and legal aspects with government and regulatory entities;

16.4.5. Establish business relationships to acquire goods or services;

16.4.6. Control payments for goods and services received;

16.4.7. Manage the administrative, accounting, financial, operational, and logistical aspects associated with the fulfillment of the contractual object;

16.4.8. Conduct qualitative and quantitative evaluations of service levels received from suppliers;

16.4.9. Communicate policies and procedures on how to do business with suppliers;

16.4.10. To carry out accounting control and recording processes of the obligations contracted with suppliers;

16.4.11. Conduct consultations, audits, and reviews derived from the business relationship with suppliers.

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

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15.5 Processing of Visitors' Personal Data at the entrance control to Webhelp's 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 Owner'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:

16.5.1 Ensure entry to Webhelp's facilities to people who have free transit authorization and restrict passage to those who are not authorized;

16.5.2 Ensuring security in monitored environments;

16.5.3 Enable adequate work environments for the safe development of activities within Webhelp.

15.6 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 Owner'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:

16.6.1 Ensure safety in work environments;

16.6.2 To allow adequate working environments for the safe development of the company's work activities; and

16.6.3 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 TREATMENT

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 required to comply with the corresponding legal and tax obligations, and/or the terms agreed in the respective contracts and agreements signed with customers. Additionally, the information retention and filing rules applicable in each country shall be taken into account. (in the case of Colombia, Law 594 of 2000 General Law of Archives and other 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. INFORMATION AND PERSONAL DATA WE PROCESS.

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17.1. AS RESPONSIBLES

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. AS MANAGERS

Under the development of its corporate purpose and in the development of our main activities, Webhelp processes the data of its customers as agents, therefore, they do not decide on the treatment that will be given to personal data but proceed on behalf of the controller of personal data and using the means designated by them, following the guidelines, policies and contractual guidelines, as well as in compliance with the regulatory provisions relating to the agents that are applicable in the relevant territories.

Webhelp has the necessary technical and organizational security measures in place to guarantee the confidentiality and integrity of its client's data and to carry out proper data processing in its capacity 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 personal references, socioeconomic level, status, and financial situation.

17.3.4 Personal information related to your health status, social security entities to which you are affiliated, disciplinary, and judicial records.

17.3.5 Cookies, analytics, and similar technologies:

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

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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 treated to understand and improve the quality of the website, however, Webhelp Américas 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. Likewise, 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 such information is specifically and knowingly provided by the individual.
- 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 not be able to access some parts of our website. 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. TREATMENT OF SENSITIVE DATA

In more special circumstances and only in order to comply with legal and previously established purposes, we may collect data that may be considered as sensitive 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 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 Owners of the information and personal data 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 Owners provide any sensitive personal data to the

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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 owner of the information, except for the exceptions provided by law. 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 of personal data when such processing is subject to special rules, laws, and/or regulations. Webhelp operates in different countries, so the provisions of the local rules of each country and region, as well as the applicable international rules and agreements on the matter, shall apply.

19.1 EUROPEAN REGULATION FOR THE PROTECTION OF PERSONAL DATA (GDPR):

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

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 European regulation on personal data protection will be respected.

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

The California Consumer Privacy Act (CCPA), the California Privacy Rights Act (CPRA), or other U.S. state regulations regarding the processing of Personal Data may be applicable from time to time.

Therefore, following the provisions outlined in these standards, Webhelp will store or learn personal data or information of US residents, where applicable, solely in its capacity as a "Service Provider", through the business relationship and instructions from its customers.

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

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



19.2.1 The information rights of owners in the CCPA and the CPRA:

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

- Right to Access. The owner has the right to know what data has been collected about him/her during the past 12 months, including the following:

- o The categories of personal information that have been collected;
- o The categories of sources from which personal information is collected;
- o The business or marketing purpose for collecting your personal information;
- o The categories of third parties with whom your personal information has been shared; and
- o The specific personal information that has been collected; o The categories of third parties with whom your personal information has been shared; and o The specific personal information that has been collected.

- Right to Delete. The owner has the right to request the deletion of personal information that has been collected about him/her. 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:

- i) Complete a transaction;
- ii) Provide you with a good or service;
- iii) Execute a contract;
- iv) Protect the owner's security and hold those who violate it accountable;
- v) Repair the system in the event of an error;
- vi) Protect the owner's rights of freedom of speech or expression
- vii) Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et seq.);
- viii) 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;
- ix) To comply with a legal obligation; or
- x) 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
- xi) To request that your personal information not be sold
- xii) 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.

- Exercising the privacy rights of the owner of the information. To request access to or deletion of your personal information, or to exercise any other data rights under California law,

You may contact Webhelp by the means specified in Section 12.1 of this Policy.

- Response Time. Our goal is to respond to a consumer's request for access or removal within forty-five (45) days of receipt of the request. If we require more time, we will inform you of the reason

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and the extension period in writing.

- Means of sending the application:

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

20. AND ADOLESCENTS' PERSONAL DATA

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

The Associate and/or third party in charge who, due to their functions, know the Personal Data of children and adolescents, must have special protection and the Processing of this data requires the implementation of greater security and care 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 the website.

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, if a User uses the Website, they affirm that they are at least thirteen (13) years of age.

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.



PRIVACY AND DATA PROTECTION POLICY

WEBHELP - AMERICAS

CÓDIGO: CM-T-R-S-008

VERSIÓN:6

EDICIÓN: 28/DIC/2022

| VERSION | DATE | UPDATE DESCRIPTION |
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| ELABORATED BY | REVISED BY | APPROVED BY |
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| Name: Daniela Salomé Aristizábal Position: Data Protection Officer Americas | Name: Natalia González Lewis Position: Compliance Manager Americas Name: Julián Camilo Díaz Position: Legal Manager Americas Name: Willian Antonio de la Cruz Position: Governance and Compliance Coordinator Americas Name: Miguel Ángel Lures Position: Information Security Specialist | Name: Paola Saavedra Position: Legal and Compliance Director Americas Name: Fernando Moreno Position: Corporate Security Director Americas |