



# Webhelp

## DEFINITIONS FOR PRIVACY POLICY AND PROCEDURES

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## Definition for Privacy Policy and Procedures

<b>“Applicable Data Protection Legislation”</b>	Means (i) the European Regulation 2016/679 relating to the Processing of Personal Data as of its date of application, and (ii) any regulation relating to the Processing of Personal Data applicable during the term of this Privacy Policy.
<b>“Binding Corporate Rule”</b>	Means Personal Data protection policies and procedures which are adhered to by Webhelp for transfers or a set of transfers of Personal Data to a Data Controller or Data Processor in one or more third countries within the Webhelp group.
<b>“Client”</b>	Means any third party whose Personal Data is Processed by a Webhelp Entity acting as Data Processor.
<b>“Data” or “Information”</b>	Means any kind of information which is individually accessible by electronic or other means such as, but not limited to, logs, Personal Data, documents or other materials.
<b>“Database”</b>	Means a collection of independent works, data, Information or other materials arranged in a systematic or methodical way and individually accessible by electronic or other means.
<b>“Data Controller”</b>	Means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determine the purposes and means of the Processing of Personal Data.
<b>“Data Processor”</b>	Means a Webhelp Entity acting on behalf of the Data Controller and/or Client.
<b>“Data Subject”</b>	Means any natural person, who can be identified, directly or indirectly, by means reasonably likely to be used by any natural or legal person, in particular by reference to an identifier such as a name, an identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person.
<b>“Device”</b>	Any Programmable object that can automatically perform a sequence of calculations or other sequence of operations on Data once programmed directly or indirectly for the task. Any electronic apparatus adapted for displaying in a readable format, Information. Devices include but are not limited to computers, smartphone, tablets, laptops, servers, Networks, telephony platforms etc.
<b>“Encryption”</b>	A process to obfuscate data by transforming Data into a form in which there is a low probability of assigning a meaning or making it readable except when used in conjunction with a confidential process or key to decode it. Such process could be, but are not limited to mathematical function or algorithmic process
<b>“Information Administrator”</b>	Means the natural person within Webhelp organisation, alone or jointly with others, processes or manipulates the Information in accordance with the Information Owner needs’, the objectives’, purposes’ and rules’.
<b>“Information Owner”</b>	Means the natural person within Webhelp organisation which, alone or jointly with others, determines the needs, the objective, purposes and rules of a project including Information processing.

<b>“Information Systems”</b>	<p>Means any Device used directly or indirectly by a User or another Device in order to process Information including, but not limited to collection, recording, organisation, structuring, storage, adaptation, alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of Data</p> <p>Means the person being the main point of contact of the DPO and dealing with data protection matters within each Webhelp Entity.</p>
<b>“Local Privacy Leader”</b>	
<b>“Malicious Software”</b>	<p>Means software that by its introduction, adversely affects the intended function of software/hardware. This could include but is not limited to virus, malware, trojans, ransomware etc.</p>
<b>“Networks”</b>	<p>Means the physical or logical connectivity that allows two or more Devices to communicate.</p>
<b>“Password” or “Passphrase”</b>	<p>Means a string of characters or any other logical or physical means used in conjunction with a User Identity during an authentication process to prove identity of a User and/or grant access to certain Information.</p>
<b>“Personal Data”</b>	<p>Means any information relating to an identified or identifiable natural person, (“<b>Data Subject</b>”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. Personal Data includes Sensitive Personal Data.</p>
<b>“Personal Data Breach”</b>	<p>Means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Data transmitted, stored or otherwise Processed;</p>
<b>“Privacy and Data Council”</b>	<p>Means Webhelp internal board supporting the Webhelp Group Data Protection Officer</p>
<b>“Processing” or “Processed”</b>	<p>Means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;</p>
<b>“Pseudonymisation”</b>	<p>Means the Processing of Personal Data in such a manner that the Personal Data can no longer be attributed to a specific Data Subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the Personal Data is not attributed to an identified or identifiable natural person;</p>
<b>“Risk”</b>	<p>Means a scenario describing an event and its consequences, estimated in terms of severity and likelihood.</p>
<b>“Risk management”</b>	<p>Means the coordinated activities to direct and control an organization with regard to risk.</p>
<b>“Security Incident”</b>	<p>Means attempted or successful unauthorised access, use, disclosure, modification, or destruction of Information or interference with system operations in the Information System.</p>



<b>“Sensitive Personal Data”</b>	<p>Means special categories of Personal Data which are, by their nature, particularly sensitive in relation to fundamental rights and freedoms requiring such Personal Data to merit specific protection as the context of their Processing could create significant risks to the fundamental rights and freedoms – such as Personal Data that reveals racial or ethnic origin, political opinion, religious or philosophical beliefs, or trade union membership, and the Processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health, data concerning a natural person’s sexual orientation.</p>
<b>“Service Agreement”</b>	<p>Means the agreement entered into between Webhelp and its Client pursuant to which Webhelp provides services to its Client.</p>
<b>“Software” or “Application”</b>	<p>Means any code, instruction, programs routines that allows directly or remotely the manipulation of Data through any means and includes API, command shells etc.</p>
<b>“Transfer of Personal Data”</b>	<p>Means the Processing, material transfer or distant access to Personal Data from entities established outside of the European Economic Area (EEA).</p>
<b>“User”</b>	<p>Means all Webhelp employees, third parties, third parties’ employees, contractors, contractors’ employees and other persons whose conduct and duties allows the access to Webhelp Information Systems.</p>
<b>“Webhelp”</b>	<p>For the Privacy Policy and the related Procedures Webhelp shall mean Webhelp SAS and all entities listed in the List of entities bound by the Privacy Policy (“<b>Webhelp Entity</b>”)</p>
<b>“Webhelp Group”</b>	<p>For the Privacy Policy and the related Procedures Webhelp Group shall mean all Webhelp Entities bounded by the Privacy Policy.</p>





Think Human

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