

PRIVACY NOTICE

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1. PURPOSE OF THIS PRIVACY NOTICE

This Privacy Notice (“**Privacy Notice**”) sets out how **Auditoire** SAS under French law with registered office at 44 RUE COPERNIC 75116 PARIS, registered in Paris under number B 342 133 345 (“Agency”, “we”, “us” or “our”) processes your personal data in the context of our agencies’ activities (Auditoire, Luxury Makers) in connection with the services we offer (“**Services**”) including the provision of our websites at <https://www.auditoire.com/> and <https://www.luxury-makers.com/> (together the “**Site**”).

In particular, this Privacy Notice explains our approach to any personal data (i) that we might collect from you when you use our Site or Services during any other interactions with us, or (ii) which we might otherwise process as data processors when providing Services to our clients (including the personal data we collect, why we collected it and your rights in respect of our processing of your personal data).

For the purpose of this Privacy Notice, we shall be considered a data controller of your personal data in connection with use cases identified in this Privacy Notice. Please note that in many cases where we process data in relation to Services that we provide, we may carry out the activities referred to in this Privacy Notice in our capacity as a data processor acting on behalf of our clients.

This Privacy Notice is intended to assist you in making informed decisions when using the Site and our Services. Please take a moment to read and understand this Privacy Notice. It is intended to be read in conjunction with our [Terms of Use](#) and [Cookie Notice](#).

Finally, this Privacy Notice is intended to meet the requirements of the Regulation (EU) 2016/79 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (known as “**GDPR**”), as well as the French legislation “Loi informatique et libertés” as amended. When we say GDPR, we mean both applicable law.

2. SCOPE OF THIS PRIVACY NOTICE

This Privacy Notice only applies to the use of your personal data obtained by us, whether from you directly or from a third party. It does not apply to personal data collected by third parties during your communications with those third parties or your use of their products or services (for example, where you follow links on our Site to third party websites over which we have no control).

Further, this Privacy Notice is not intended to cover the processing of workplace personal data. Accordingly, if you are engaged as a worker for us, please see our Workplace Privacy Notice which sets out further information about how we may process your personal data in connection with your employment and/or engagement.

3. TYPE OF PERSONAL DATA WE COLLECT/PROCESS

When we talk about personal data we mean any information which relates to an identified or identifiable living individual. Individuals might be identified by reference to a name, an identification number, location data, an online identifier (such as an IP address) or to other factors that are specific to them, such as their physical appearance. Categories of personal data we may collect and process about you include:

Identity Data	First name; last name.
Contact Data	email address; telephone number; social media handle ; post address.
Applicant Data	Date of birth; gender; country; nationality; CVs, work experience, education; and any other personal data that you may provide in advance of/during the recruitment process.
Image Data	Photos; video recordings.
Financial Data	Bank details
Transaction data	Details of payments made between you and us; details of services purchased from us.
Profile Data	Interests and preferences; contact preferences; whether you have participated in any promotions or competitions; feedback and survey responses; the content of any messaging you send using any Enquiry Form or Chat function on the Site.
Behavioural Data	Data relating to your browsing activity, obtained through the use of cookies, pixel tags and other similar technologies; information about when your current or previous sessions started; details about any services you viewed on the Site. See details in the Cookie policy .
Technical Data	IP address; browser type and operating system; location, to ensure we're showing you the correct notices and information; any other unique numbers assigned to a device.
Marketing and Communications Data	Marketing preferences; service communication preferences.
Publicly Available Data	Information about articles (or similar) that you may have published; Information about your interests or affiliations or publicly stated positions on political matter, corporate matters and similar.

For more information about the personal data we collect please refer to section 'HOW WE USE PERSONAL DATA' below.

4. HOW WE COLLECT PERSONAL DATA

We may collect and receive your personal data using different methods:

Personal data you provide to us	You may give us your personal data directly, for example, when you obtain services via our Site, contact us with enquiries, complete forms on our Site, subscribe to receive our marketing communications or provide feedback to us.
Personal data we collect using cookies and other similar technologies	When you access and use our Site, we will collect certain Behavioural Data and Technical Data. We collect this personal data by using cookies and other similar technologies.
Personal data received from third parties	We may receive personal data about you from third parties. Such third parties may include analytics providers, data brokers, third party directories and third parties that provide technical services to us so that we can provide our Site and our Services.
Publicly available personal data	From time to time, we may collect personal data about you (Identity Data, Contact Data, or Publicly Available Data) that is contained in publicly available sources (including open source data sets or media reports) or that you or a third party may otherwise make publicly available (for example through speeches at events or publishing articles or other news stories or posts on social media platforms).

5. WHO WE COLLECT PERSONAL DATA ABOUT

We collect and process personal data from the following people:

Site visitors	We will collect and process your personal data in connection with your interaction with us and our Site.
People who contact us with enquiries	If you contact us with an enquiry through our Site, submit a complaint or provide any feedback to us in our surveys and feedback forms, we will collect and process your personal data in connection with your interaction with us and our Site.
Client personnel	We may collect and process your personal data in connection with the supply of services to you and/or your organization.
Talent	If you supply services and/or content to us and/or work with us to provide services to our client (including featuring in content we produce), we may collect or process your personal data, such as your Identity Data, Contact Data, Financial Data, CVs in connection with such supply of services and/or content to us and our clients.
Partner/supplier personnel	If you (or your organisation) supply products or services to us or otherwise partner with us, we may collect and process your personal data in connection with our receipt of those products and services and/or partnership. This may include personal data included in any email or telephone communications or recorded on any document relating to an order for the products or services, such as your Contact Data.
Visitors to our offices, studios, production sites	If you attend one of our physical offices or other locations, we may process personal data that you volunteer in connection with your visit and any enquiries you make. For example, you may volunteer personal data when signing in as a guest, or when you register for and access our guest Wi-Fi network at our premises. CCTV footage may also be collected for security purposes.
Event attendees	If you attend one of our events, we will process personal data about you in connection with your attendance at the event. For example, we may ask you

	to complete a registration or feedback form, or other documents relating to the event.
Job applicants	If you apply for a job with us, whether through the Site or otherwise, we will collect and process your personal data in connection with your application.
Members of the public	We may process your data in connection with the provision of the Services to our clients.
Client customers/potential customers Public figures/politicians Commentators/authors/journalists	We may process your data in connection with the provision of the Services to our clients.

6. HOW WE USE PERSONAL DATA (PURPOSES / LEGAL BASIS)

The below schedule provides you an overview of the personal data we collect about you, why we collect it (“purpose”) and what the legal ground for this processing is.

PROCESSING VIA THE WEBSITE		
PURPOSE	CATEGORIES OF PERSONAL DATA	LEGAL GROUND
To respond to your inquiries	Identity Data Contact Data	Depending on the requests : <ul style="list-style-type: none"> • Necessary for the performance of a contract or in order to take steps at your request prior to entering into a contract • Or Legitimate interest
To provide you with information on our services through direct marketing	Identity Data Contact Data	Depending on the applicable legal requirements: <ul style="list-style-type: none"> • Your consent • Our legitimate interest to process your personal data for direct marketing purposes
To personalize your experience on the Sites, e.g. to remember certain information so you will not have to re-enter it or to tailor the Sites around your preferences;	Behavioural Data and Technical Data (in aggregate)	Personal data processed via cookies: <ul style="list-style-type: none"> • Cookies that are strictly necessary: our legitimate interest to tailor our websites to you • Cookies that are not strictly necessary: your consent
To interact with Social Media , e.g. if you click on one of the social media links on our Site or otherwise interact with our social	Behavioural Data and Technical Data	Depending on the applicable legal requirements: <ul style="list-style-type: none"> • Your consent

<p>media pages such as on Facebook or Instagram (including interacting with any 'like' or similar embedded features on our Site or social media accounts).</p> <p>The social media platform may also be a controller in respect of the personal data that is collected via your use of our social media pages and may use that personal data for additional purposes. For details of how the relevant social media platform uses your personal data, please see the privacy notice of the relevant social media platform.</p>		<ul style="list-style-type: none"> • Our legitimate interest to promote our site and brands via social media, to ensure we provide the site in an effective way
<p>To operate, evaluate and improve our Site and our Services (including developing new services; enhancing and improving our services; analyzing our services; managing our communications; performing data analytics; and performing accounting, auditing and other internal functions)</p>	<p>Behavioural Data and Technical Data (in aggregate)</p>	<p>Personal data processed via cookies:</p> <ul style="list-style-type: none"> • Cookies that are strictly necessary: our legitimate interest to measure and enhance the Sites and to learn about the effectiveness of our communications • Cookies that are not strictly necessary: your consent

Where we process personal data on behalf of our client as a data processor, we do not require a legal basis for such processing. Our client, as data controller defines the appropriate legal basis.

PROVISION OF OUR SERVICES		
PURPOSE	CATEGORIES OF PERSONAL DATA	LEGAL GROUND
<p>Content creation and managing talents</p> <p>e.g. to select talents for a particular campaign and work with that talent.</p>	<p>Identity Data, Contact Data, Applicant Data and Publicly Available Data as well as biography and personal preferences of individuals we may use for a particular campaign</p> <p>We may obtain this information directly from the individual, via third party recruiters or agents, or publicly available sources.</p> <p>As part of creating the content featuring the talent, we will process their Image Data or Voice</p>	<p>It is in our legitimate interests (or those of our client) to process talent personal data in this way to enable us to provide our services.</p> <p>Where we process special category data in connection with this purpose that was collected from the talent directly, we will only do so with the talent's explicit consent. Where we obtain this special category from publicly available sources, we will rely on the fact that the individual made such information manifestly public.</p>

	as well as Identity and Applicant Data.	
Managing events	This may include identification and contact data, special categories of personal data (e.g. allergies) and images.	Necessary for the performance of a contract or in order to take steps at your request prior to entering into a contract Consent (where legally required to take and process your image).
Media and Social Media monitoring As part of our service to our clients, we may monitor media sites (including social media sites) and collect information about individuals from these sites directly or using a third party social listening provider	Publicly Available Data on Social Media including opinions on how a particular client campaign was received or a client offering or on a topic that is relevant to our client more generally.	It is in our legitimate interests (and those of our clients) to process personal data in this way to ensure we provide the services requested by our clients in an effective and efficient way.
Social media We may collect or process individuals' personal data who engage with us through our social media channels (including by visiting our social media pages or otherwise communicating with us via social media). We may also operate our client's social media pages, accounts or channels acting on their behalf.	Contact Data, Identity Data and some Profile and Publicly Available Data	It is in our legitimate interests to process personal data in this way so that we can market ourselves and engage with the public. We will only share personal data with the third-party providers of the Social Platforms, so that we can advertise our Services whilst the individual is using those Platforms, where they have provided their consent.
Client data insight and analysis on an anonymised and/or aggregate basis so that we can improve our services and help our client to better understand their own customers' interests and improve their products/ services.	The data that is collected includes Behavioural Data and Technical Data, and certain Profile Data. Please note that often such services will relate to anonymous data sets (aggregated data sets, statistical data sets and similar) and are used for high-level market analytics or understanding macro consumer habits (amongst other things). When we do this, we and our clients are not processing personal data.	To the extent the above involves personal data, it is in our legitimate interests to process personal data in this way to enable us to provide our services. Where your data is collected through the use of non-essential cookies, we rely on consent to collect your personal data and for the onward processing purpose. Please see our Cookie Notice for further details.
Events We may organise and host road shows and other industry events to promote our services or on behalf of clients.	Identity Data and Contact Data (including email address, postal address and telephone number)	It is necessary for us to use personal data to perform our obligations in accordance with any contract that we may have with the individual, or it is in our or our client's legitimate interest to use

	<p>If relevant, we may collect and process any dietary or other requirements you may have.</p> <p>You may also feature in photographs taken at our events and such photographs may appear in publications we send to our clients and/or publish on our Site, in print or other media.</p>	<p>personal data in such a way to ensure that we provide our services in an effective and efficient way.</p> <p>If we specifically ask your permission to use your photographs, quotes, testimonials or other content, then our processing of such personal data will be based on consent.</p> <p>Where we put on events solely at the specific request of our clients we do so in our capacity as our client's data processor and therefore do not require a legal basis to process personal data.</p>
<p>Campaign reporting</p> <p>As part of our service to our clients, we may collect information about individuals through third party providers or directly from the individual or through social media or other media outlets such as their contact details and opinions on how a particular client campaign was received or other feedback they may have about a campaign or a client offering.</p>	<p>Identity Data, Contact Data, Publicly Available Data</p>	<p>It is in our legitimate interests (and those of our clients) to process personal data in this way to ensure we provide the services requested by our clients in an effective and efficient way and provide our clients with insight into the performance of a campaign or client offering.</p>
<p>Market research and focus groups</p> <p>For the purposes of carrying out market research through focus groups, interviews and user testing. We may do this on behalf of our clients or for our own purpose.</p>	<p>Identity Data, Contact Data, Registration Data, Preference Data records of communications, health data, opinion data, age range, nationality, image, and education history</p>	<p>It is in our legitimate interests (or those of our clients) to process personal data to ensure that we provide the services requested by our clients in an effective and efficient way.</p> <p>Where we process special category data that was collected from an individual directly in connection with this purpose, we will only do so with the individual's explicit consent.</p> <p>Where we obtain this information from publicly available sources, we will rely on the fact that the individual made such information manifestly public.</p>
<p>Surveys and voting for the purposes of obtaining feedback on our own or our clients' products and surveys. Participation in such polls is voluntary and individuals will have the opportunity to</p>	<p>Identity Data, Contact Data and Profile Data</p>	<p>It is in our legitimate interests (and those of our clients) to obtain feedback on our products or services.</p>

decide whether or not to disclose personal data.		
<p>Promotions</p> <p>We may conduct promotions, contests or giveaways on our own behalf (or on behalf of our clients), which may require that individuals register to enter. We collect personal data from individuals in order to conduct the promotion, contest or giveaway and to deliver prizes or notices. Participation in these events and providing us with personal data is voluntary.</p>	Identity Data, Contact Data and Profile Data	It is necessary for us to use personal data to perform our obligations in accordance with any contract that we may have (e.g. the promotion terms and conditions) or it is in our legitimate interests (and those of our clients) to process personal data in this way in order to enable individuals to participate in the promotion, contest or giveaway or we may do so in order to perform an obligation owed to individual.
<p>Marketing : to send you (or the organisation you represent) marketing communications by email or via phone.</p>	Identity Data, Contact Data and Marketing and Communications Data	It is in our legitimate interest to use your personal data to ensure the promotion of our services is tailored and/or appealing to you and/or the organization you work for although sometimes we may also obtain your consent.
<p>Media and informational inquiries.</p> <p>Data about journalists, client contacts or industry contacts for interviews requests, for media questions, or requests for information about our Agency.</p> <p>To receive newsletter, or other forms of information that we make available.</p>	Identity Data, Contact Data and Publicly Available Data	It is in our legitimate interests (and those of our clients) to process personal data in this way to ensure we provide the services requested by our clients in an effective and efficient way and that we provide the right information to those who request it.
<p>Industry Mapping</p> <p>We collect, and maintain data bases containing, information about journalists, talent, social media influencers, social media users and other professionals in the public relations, news or media industry collected by us or by our trusted third party media analytics service providers.</p> <p>This information may be information that is voluntarily supplied to us by the concerned individuals, or information that is public , in third party platforms (including social media platforms) or available in third party databases.</p>	Identity Data, Contact Data and Publicly Available Data	It is in our legitimate interests (or those of our client) to process personal data in this way so that we can provide the services requested by our clients in an effective and efficient way. Where the personal data collected is considered special personal data, we rely on the fact that the personal data has been manifestly made public by individual in order to process their personal data.

<p>Further we may collect and/or review other publicly available news stories and other journalistic content to understand what people are saying about us, our services and/or our clients. We use this information to provide our services to our clients including ensuring we and our clients are fully up to speed on public opinion in any particular area and are fully briefed when it comes to dealing with the press. We may also use this information to contact those individuals to discuss our services or our clients' goods and services. We may also use this information for our own internal administrative and promotional purposes.</p>		
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Where we process personal data on behalf of our client as a data processor, we do not require a legal basis for such processing. Our client, as data controller defines the appropriate legal basis.

OTHER TYPES OF PROCESSING		
PURPOSE	CATEGORIES OF PERSONAL DATA	LEGAL GROUND
<p>To comply with and enforce applicable legal requirements, relevant industry standards, contractual obligations and our policies, including this Privacy Notice and our Terms of Service.</p>	<p>This may include your contact details, which may include your name, e-mail address, postal address and contact telephone number</p>	<p>To comply with a legal obligation</p>
<p>Business administration, finance and legal compliance, in particular:</p> <ul style="list-style-type: none"> • to facilitate the operation or effective management of our group of businesses; • for financial, accounting and tax purposes; • to comply with our legal obligations; • to enforce or protect our legal rights; • to deal with complaints; • to protect the rights of third parties (including where health or security of an individual is endangered (e.g. a fire); and 	<p>This may include identification data, contact data, financial data, transaction data, Publicly Available Data</p> <p>We will not process any special (or sensitive) categories of personal data or personal data relating to criminal convictions or offences except where we are able to do so under applicable legislation or with the individual's explicit consent.</p>	<p>Where we use personal data in connection with a business transition, to enforce our legal rights or to protect the rights of third parties, it is in our legitimate interest to do so.</p> <p>For all other purposes described in this section, we will rely on our obligation to comply with law (including any court order) to process such personal data.</p>

<ul style="list-style-type: none"> • in connection with a business transition or sale such as a merger, re-organisation, acquisition by another company, or sale of all or a portion of our assets. 		
<p>Receipt of services</p> <p>If we have engaged an organisation to provide us or our client with services (for example, IT support or financial advice), we will collect and process your personal data if you are a contact within the relevant organisation in order to manage our relationship or our clients with the organization, to receive services from the organisation and, where relevant, to provide our services to others including our clients.</p>	<p>Contact and Identity Data</p>	<p>It is necessary for us to use personal data in this way to perform our obligations in accordance with any contract that we may have with the organisation, or it is in our legitimate interest to use personal data in such a way to ensure that we have an effective working relationship with the organisation and are able to provide our services to others in an effective way.</p>
<p>Recruitment</p> <p>If individuals apply for a job with us or otherwise express an interest in working for us, we will use personal data for the following purposes:</p> <p>a) to assess the individual’s suitability for any position for which they applied (or future positions for which we think the individual may be suitable);</p> <p>b) to take any steps necessary to enter into any contract of employment (or otherwise) with the individual;</p> <p>c) to comply with any regulatory or legal obligations in relation to any such application; and</p> <p>d) to review our equal opportunity profile in accordance with applicable legislation. We do not discriminate on the grounds of gender, race, ethnic origin, age, religion, sexual orientation, disability or any other basis covered by local legislation.</p>	<p>Contact details, Identity Data and CV or resume information</p>	<p>Where we use personal data in connection with recruitment and talent management it will be in connection with us entering into a legal contract with them or it is in our legitimate interest to use personal data in such a way to ensure that we can make the best recruitment and talent management decisions for our Agency, or it is our legal obligation to use such personal data to comply with any legal obligations imposed upon us. We will not process any special data except where we are able to do so under applicable legislation or with the individual’s explicit consent.</p> <p>For further information about this please see our RECRUITMENT NOTICE available on our Site.</p>
<p>Visiting our premises, studios or production sites</p>	<p>Identity or Contact Data, image (surveillance cameras), health requirements (covid 19 vaccination or testing in</p>	<p>It is in our legitimate interests to process personal data for security reasons and we may collect data relating to Covid-19 in order to</p>

<p>For the sign in process to enter our premises</p> <p>To use our Wi-Fi access as a guest</p> <p>For monitoring of the Wi-Fi and record-keeping purposes, including to identify the source of service requests, optimise and maintain performance of the Wi-Fi service, and investigate and prevent system abuse.</p>	<p>accordance with government regulation or guidance), Behavioural and Technical Data in connection with any use of this free Wi-Fi service</p>	<p>comply with our legal obligations in relation to health and safety, or other legal obligations introduced in relation to the Covid-19 pandemic.</p> <p>Where we process personal data in connection with providing access to our free Wi-Fi service, it is in our legitimate interests to process personal data in this way to provide the service.</p> <p>Where we monitor use of our free Wi-Fi service to ensure proper use of the system, we process personal data for monitoring and record-keeping purposes based on guest user consent.</p>
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Where we process personal data on behalf of our client as a data processor, we do not require a legal basis for such processing. Our client, as data controller defines the appropriate legal basis.

To the extent that the provision of personal data is a legal or a contractual requirement or a requirement necessary to enter into a contract, you are required to provide this personal data to us. If you choose not to do so, we may not be able to offer you certain of our Services and features of the Sites.

7. SHARING YOUR PERSONAL DATA

We only share personal data with others when we are legally permitted to do so. When we share personal data with others, we put contractual arrangements and security mechanisms in place to protect the personal data shared and to comply with our data protection, confidentiality and security standards and obligations.

We may share data (subject to the above) within Omnicom Group companies, Omnicom Networks, or with our partner agencies. For more information about the Omnicom Group, please see here: [Advertising and Marketing Agencies | Omnicom Group](#)

Further (again subject to the above) we may share your personal data with third parties, as set out in the table below. This list is non-exhaustive and there may be circumstances where we need to share personal data with other third parties.

Our clients	When relevant, we may share personal data with our clients for the purposes of providing them with Services.
Delivery and courier companies	We may share personal data with suppliers who assist us in providing our Services to our customers.
Event partners and suppliers	When we run events, we may share your personal data with third-party service providers that are assisting us with the operation and administration of that event. If we are running an event in partnership with other organisations, we will share your personal data with such organisations for use in relation to the event.

Hotel and transport suppliers	We may share your personal data with various hotel and/or transport providers in connection with the provision of our services.
Production suppliers	When we work on a particular production or otherwise create content, we may share your personal data with our various production and/or content creation suppliers including without limitation production companies, artworkers, editors, creatives, post production houses, venue suppliers and/or caterers.
Advertising partners	We may share personal data with third party advertising partners, including those within the Omnicom Group and those set out in our Cookie Privacy Notice and/or our Cookie preference centre when you use our Site. This data is used to provide you with, and measure the effectiveness of, online personalised advertising and for other advertising related activities.
Third-party IT suppliers	We may share personal data with third parties who support us in providing our Site and help provide, run, and manage our internal IT systems. Such third parties may also include, for example, providers of information technology, cloud-based software-as-a-service providers, identity management, website design, hosting and management, data analysis, data back-up, security, and storage services. The servers powering and facilitating that cloud infrastructure are located in secure data centres around the world, and personal data may be stored in any one of them. We may also share your personal data with third-party service providers to assist us with insight analytics. These providers are described in our Cookie Notice or in the Cookie Management Platform .
Payment providers and banks	We may share personal data with third parties who assist us with our invoicing and/or making/receiving payments.
Third-party post/email marketing and CRM specialists	We may share personal data with specialist suppliers who assist us in managing our marketing database and sending out email marketing communications.
Recruitment agencies and related organisations	We may share personal data with external recruiters, third-party providers that undertake background checks on our behalf and other entities within our group of companies for recruitment purposes.
Third-party suppliers who assist us in administering our promotions	We share personal data with specialist suppliers who assist us in administering our prize draws, prize competitions and other promotions.
Auditors, lawyers, accountants and other professional advisers	We may share personal data with professional services firms who advise and assist us in relation to the lawful and effective management of our organisation and in relation to any disputes we may become involved in.
Law enforcement or other government and regulatory agencies and bodies	We may share personal data with law enforcement or other government and regulatory agencies or other third parties as required by, and in accordance with, applicable law or regulation.
Other third parties	Occasionally, we may receive requests from third parties with authority to obtain disclosure of personal data, such as to check that we are complying with applicable law and regulation, to investigate an alleged crime, or to establish, exercise or defend legal rights. We will only fulfil requests for personal data where we are permitted to do so in accordance with applicable law or regulation.

8. TRANSFERS OF PERSONAL DATA OUTSIDE OF THE EUROPEAN ECONOMIC AREA

If you are located in the European Economic Area (“EEA”), we will comply with Applicable Data Protection Law in terms of providing adequate protection for the transfer of personal data to recipients in countries outside of the EEA.

In case we transfer your personal data to a third country or international organisation (i.e., outside the EEA – for instance if your data needs to be sent to our holding, in the US, or to other agencies from our Group), we will make sure that your personal data is either transferred to third countries that are deemed to be offering an “adequate” level of protection by the European Commission (a list of adequate third countries is available on the European Commission’s website), or alternatively, where your personal data is not sent to a country that provides an adequate level of protection, we will put in place appropriate safeguards with the entity receiving your personal data (e.g. the EU standard contractual clauses (“SCCs”) or binding corporate rules) to ensure that your personal data remains protected in accordance with Applicable Data Protection Law.

To find out more about the SCCs we use, please see: [Standard contractual clauses for international transfers | European Commission \(europa.eu\)](#).

9. OBTAINING YOUR CONSENT

Where our use of your personal data requires your consent, you can provide such consent:

- at the time that we collect your personal data following the instructions provided; or
- by informing us by e-mail, or post using the contact details set out in this Privacy Notice.

Please note that if you specifically consent to additional uses of your personal data, we may use your personal data in a manner consistent with that consent.

If you receive promotional, marketing or other commercial communications from us, to unsubscribe from any future emails, you should send us a request using the contact details set out in the section entitled "**how to contact us**" or use the unsubscribe button included in each marketing communication.

10. CONFIDENTIALITY AND SECURITY OF YOUR PERSONAL DATA

We are committed to keeping the personal data you provide to us secure and we have implemented information security policies, rules and technical measures to protect the personal data under our control from unauthorised access, improper use or disclosure, unauthorised modification and unlawful destruction or accidental loss. In addition, all our employees and data processors (i.e. those who process your personal data on our behalf) are obliged to respect the confidentiality of the personal data of all users of our Site and those who purchase our Services.

11. YOUR RIGHTS AS A DATA SUBJECT

You have the following rights in relation to the personal data we hold about you under certain circumstances:

- You may request **access** to and obtain copies of any personal data we have processed about you.

- You may also request that any of your personal data that is inaccurate or incomplete be **rectified or completed**. However, please be aware that it is every person's responsibility to provide us with accurate personal data and to inform us of any changes ;
- You may ask your personal data to be **erased**
- You may **object** to the processing of your personal data, ask us to **restrict** processing of your personal data or request **portability** of your personal data in a commonly used electronic format;
- If we collect and process your personal data with your consent, you can **withdraw your consent** at any time. The withdrawal of your consent shall not affect the lawfulness of any processing based on your consent before its withdrawal;
- To give us instructions concerning the use of your personal data after your death.

You may exercise these rights in writing using our contact information provided in the section below entitled "**how to contact us**". We will endeavour to promptly respond to your requests. We will manage your request in accordance with Applicable Data Protection Law. If your request is denied, we will inform you about the reasons for denial.

In addition, if you are not satisfied with the response given concerning the processing of your personal data, you have the right to **lodge a complaint** with the supervisory authority by writing to the following address Commission Nationale de l'Informatique et des Libertés, (CNIL) 3 Place de Fontenoy - TSA 80715 - 75334 PARIS CEDEX 07.

Please note that in order for you to assert these rights, we may need to verify your identity to confirm your right to access your personal data. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

12. HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We retain personal data only for as long as is necessary for the purposes described in this Privacy Notice, after which it is deleted from our systems, unless otherwise instructed by the data controller where our client is the data controller.

If any personal data is only useful for a short period (e.g. for a specific event or marketing campaign or in relation to recruitment), we will delete it at the end of that period. Please note that if you are an unsuccessful candidate we may keep your information for a short period.

If you have opted out of receiving marketing communications from us, we will need to retain certain personal data on a suppression list so that we know not to send you further marketing communications in the future.

13. PERSONAL DATA OF MINORS

Our Site is not intended for use by, or targeted at, minors and we do not knowingly collect personal data of minors. However, due to the nature of our organisation and the Services we provide, we may from time to time collect and process personal data relating to minors. If we do collect personal data of minors, we will comply with all applicable laws and regulations relating to the processing of personal data of minors.

14. THIRD PARTY LINKS AND SERVICES

This Site contains links to third party websites and services. Please remember that when you use a link to go from our Site to another website or you request a service from a third party, this Privacy Notice no longer applies to these third-party websites and third-party service providers.

Your browsing and interaction on any other websites, or your dealings with any other third-party service provider, is subject to that website's or third-party service provider's own rules and policies. We do not monitor, control, or endorse the privacy practices of any third parties.

This Site may integrate with social networking services. You understand that we do not control such services and are not liable for the manner in which they operate. While we may provide you with the ability to use such services in connection with our Site, we are doing so merely as an accommodation and, like you, are relying upon those third-party services to operate properly and fairly.

15. HOW TO CONTACT US

If you have any questions about this Privacy Notice or want to exercise your rights as a data subject set out in this Privacy Notice, you can contact us using the following methods:

Email	Send us an email at: privacy@tbwa.com
Post	Write to us at: TBWA - DPO, 162 rue de Billancourt, 92100 Boulogne Billancourt

16. CHANGES TO THIS POLICY

We will update this Privacy Notice from time to time to reflect any changes or proposed changes to our use of your personal data, or to comply with changes in applicable law or regulatory requirements.

If we have your contact information, we may notify you by email of any significant changes to this Privacy Notice, but we encourage you to review this Privacy Notice periodically to keep up to date on how we use your personal data. If we update this Privacy Notice, we will update the effective date at the top of the page.