



HAVAS N.A. PRIVACY NOTICE

This Privacy Policy Notice sets forth the privacy principles with respect to your personal information for Havas including the implementation of privacy procedures and technical security measures to keep your personal information private and secure. It explains:

- Categories of Personal Information Collected
- How Havas Collects Your Information
- Purposes Personal Information, Including Sensitive Personal Information, Is Used
- To Whom Havas May Disclose Your Information
- Cookies and Other Technologies
- Retention of Personal Information
- Personal Information from California
- Personal Data from the European Union and Switzerland
- Personal Information from Canada
- These Sites Are Not Intended for Children
- Security
- How to Contact Us
- Updates to this Policy Notice

Our Privacy Policy applies to personal information collected by Havas on the websites where this Privacy Policy Notice appears or where our is referenced. Your use of this site indicates you agree to acknowledge our collection, use and disclosure of your information as described in this Privacy Policy Notice. If you disagree with the way we collect or handle your data, please do not use this website. If you have any questions regarding our use of data, please contact privacy.na@havas.com.

CATEGORIES OF PERSONAL INFORMATION COLLECTED

Identifiers and Contact Information. We may collect information you submit when you contact us, RSVP for an event, download a white paper, or submit an inquiry. Such information may include your name, current company, title, email address, and/or telephone number.

Professional and Employment-Related Information. If you apply for a job, you may volunteer to submit your resume and other personal information like your gender, race, ethnicity, veteran status, or disability status. We may also collect your mailing address, zip code or postal code, telephone number and email address.

Educational Information. As part of the hiring process, we may collect education information that is not publicly available personally identifiable information as defined in the Family Education rights and Privacy Act (20 U.S.C. section 1232g; 34 C.R.R. Part 99).

Internet or Other Electronic Network Activity Information. We collect browsing and usage information. When you use our site, we may automatically collect information about your interactions with the site, your IP address, or and the browser you are using. This data may reveal what site you came from, or what site you visit when you leave our site. We might collect device identifiers.

Geolocation Data. Our technology collects your general location using your IP address.

Protected Classification Information. If you apply to employment with us, we make collect protected classification information like your gender, race, ethnicity, veteran status, or disability status.

Commercial Information. This category includes, without limitation, products and services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.

Audio, electronic, Visual, Thermal, Olfactory, or Similar Information. This category includes, for example, information collected from voicemail messages, while speaking with one of our representatives, and/or by video camera.

Sensitive Personal Information. In the course of interactions with you, for example if you visit our site, apply for employment, or are hired to work here, we may collect:

- Social Security, driver's license, state identification card, or passport number
- Financial account information that allows access to an account, including log-in credentials, financial account numbers, passwords, etc.
- Precise geolocation may be collected by our website, using different types of technologies including GPS and Wi-Fi
- Racial or ethnic origin, religious or philosophical, or union membership

- Content of mail, email, and text messages (unless the Company is the intended recipient of the communication)
- Pre-employment due diligence on background information and criminal record
- Genetic data
- Biometric information for the purpose of security
- Health information
- Information concerning sex life or sexual orientation

HOW HAVAS COLLECTS YOUR INFORMATION

Havas obtains personal information in a variety of ways and takes care to protect its privacy in compliance with applicable data protection laws, including the California Consumer Privacy Act (“CCPA”), as amended by the California Privacy Rights Act (“CPRA”), Cal. Civ. Code 1798.11 et seq.

We collect information directly from you. For example, we may collect information when you contact us or submit an inquiry or job application.

We collect information from you passively. We use tracking tools like browser cookies and web beacons to collect information about users over time when you use this site or our mobile site. We may have third parties collect information this way. To learn more about these tools and how you can control them, please see the “Cookies and Other Technologies” section below.

We get information about you from other parties. Our business partners, such as clients, service providers, and parent, affiliate and/or subsidiary agencies may give us information about you. Social media platforms may also give us information about you.

We collect publicly available information. We sometimes use Google, LinkedIn or social media for our internal recruitment purposes, to gather insights for our internal market research purposes, such as business development/new business pitches, to find speakers for events or influencers, or to uncover patterns, insights, correlations and trends in connection with marketing strategy services for our clients.

We combine information. For example, we may combine information that we have collected offline with information we collect online. Or we may combine information we get from a third party with information we already have.

PURPOSES PERSONAL INFORMATION, INCLUDING SENSITIVE PERSONAL INFORMATION, IS USED

We use information for marketing purposes. For example, we might provide you with information or serve you ads about our events or services. We might

tell you about new features or updates to our offerings. These might be third party offers or products we think you might find interesting. We might send you emails or call you by phone. To stop receiving our marketing emails, email us at privacy.na@havas.com or follow the instructions in any marketing message you get from us. Even if you opt out of getting marketing messages, we will still send you transactional messages, such as responses to your questions or feedback.

We use information to respond to requests or questions. We may use information to respond to your inquiry, job application, or feedback.

We use information to communicate with you. We might contact you about this Privacy Policy Notice, our Terms and Conditions of Use, or other aspects of our relationship with you.

We use information to improve our products and services. We may use information to make our site better or enhance our product and service offerings.

We use information for security purposes. We may use your information to protect our agency and our sites. We may also use your information to protect our users or clients.

We use information as otherwise permitted by law or as we may notify you.

TO WHOM HAVAS MAY DISCLOSE YOUR INFORMATION

To carry out the purposes outlined above, the Company may disclose personal information to service providers or other outside parties. The Company does not sell or share, as those terms are defined under applicable law, the above categories of personal information. The Company may add to the categories of personal information it collects and the purposes for which it uses that information. The Company will inform you in the event it does so.

We may disclose information within the Havas family of agencies. This may include parent, affiliate, and/or subsidiary agencies.

We may disclose information with vendors that perform services on our behalf. For example, we may disclose information to the companies that operate our site or conduct analytics for us. You can contact us if you want to learn more about how our service providers use your information.

We may disclose information to our business partners. We may disclose information to third parties who collaborate on projects or co-host events with us.

We may disclose information to third parties for their marketing purposes. These third parties may include our clients and partners. They may also include third parties in whose products or services we believe you may be interested. These third parties may also disclose your information to others. These third parties may use the information for their own marketing

purposes or the marketing purposes of others. This may include the delivery of interest-based advertising.

We will disclose information if we think we have to in order to comply with the law or to protect ourselves. For example, we may disclose information to respond to a court order or subpoena. We may share it if a government agency or investigatory body requests.

We may disclose information to any successor to all or part of our business. For example, if part of our agency was sold, we may give our personal information as part of that transaction.

We may disclose information for other reasons that we may describe to you at the time of collection.

COOKIES AND OTHER TECHNOLOGIES

You can control cookies and tracking tools. For more information about cookies and how to control them, please see our [Cookie Notice](#).

The Self-Regulatory Program for Online Behavioral Advertising provides consumers with the ability to opt-out of having their online behavior recorded and used for online behavioral advertising purposes. [Click here](#) or [here](#) to opt out of having your online behavior collected for advertising purposes and receiving behaviorally targeted advertisements from our advertising partners. Selections you make are device-specific and browser-specific, meaning that you may need to make your selections on each browser on each device you use to access the website.

Do Not Track. "Do Not Track" is a privacy preference that you can set in your Internet search browser that sends a signal to a website that you do not want the website operator to track certain browsing information about you. However, because our site is not configured to detect Do Not Track signals from a user's computer, we are unable to respond to Do Not Track requests. Cookies set when your visit our site may track you over time and across third party websites.

You can control tools on your mobile devices. For example, you can turn off the GPS locator on your phone or device.

RETENTION OF PERSONAL INFORMATION

We retain your personal information for as long as is necessary for the purpose for which it was collected and in accordance with the Company's data retention schedule. We may retain your personal information for longer if it is necessary to comply with our legal or reporting obligations (for example, if we are required to retain your data to comply with applicable laws), resolve

disputes, enforce our legal agreements and policies, address other legitimate business needs, or as permitted or required by applicable law. We may also retain your personal information in a deidentified or aggregated form so that it can no longer be associated with you. To determine the appropriate retention period for your personal information, we consider various factors, such as the amount, nature, and sensitivity of your information; the potential risk of unauthorized access, use or disclosure; the purposes for which we collect or process your personal information; and applicable legal requirements. Personal information does not include certain categories of information, such as publicly available information from government records, information lawfully made available to the general public by the consumer or from widely distributed media, information made available by a person to whom the consumer has disclosed the information if the consumer has not restricted the information to a specific audience, and deidentified or aggregated consumer information.

PERSONAL INFORMATION FROM CALIFORNIA

For purposes of the California Consumer Privacy Act of 2018 (the "CCPA"), as amended by the California Privacy Rights Act of 2020 (the "CPRA"), we are generally a service provider on behalf of our clients. In rare instances in which we have not collected or processed personal information as a service provider, individuals who reside in the State of California have certain individual rights, which are outlined below.

These California privacy rights include:

Right to Know About Personal Information Collected or Disclosed. As a California resident, you have the right to request additional information, beyond that disclosed above, regarding the following, to the extent applicable:

- the categories of personal information Havas collected about you
- the categories of sources from which that personal information was collected
- the business or commercial purposes for which that information was collected, sold, or shared
- the categories of third parties to whom the information was disclosed
- the specific pieces of personal information collected

Right to Request Deletion of Your Personal Information. You have the right to request that we delete the personal information we collected or maintain about you. Once we receive your request, we will let you know what, if any, personal information we can delete from our records, and will direct any

service providers and contractors to whom we disclosed your personal information to also delete your personal information from their records.

There may be circumstances where we cannot delete your personal information or direct service providers or contractors to delete your personal information from their records. Such instances include, without limitation, when the information at issue is maintained: (a) to enable solely internal uses that are reasonably aligned with your expectations based on your relationships with Havas and compatible with the context in which you provided the information, or (b) to comply with a legal obligation.

Right to Request Correction. You have the right to request that the Company correct any inaccurate personal information we maintain about you, taking into account the nature of that information and purpose for processing it.

Right to Limit Use or Disclosure of Sensitive Personal Information. You have the right, subject to certain exceptions, to request that we limit the use and disclosure of your sensitive personal information, as that term is defined in the CCPA. We do not currently collect or process your sensitive personal information for the purpose of inferring characteristics about you.

Right to Non-Discrimination for the Exercise of Your Privacy Rights. We will not discriminate or retaliate against you for exercising any of the rights described above.

SUBMITTING CPRA RIGHTS REQUESTS

Upon receipt of a verifiable request, and as required by applicable law, we will provide a response to such request. To learn more about these rights, or to submit a request under the CCPA to request to know about your personal information, or to request deletion or correction of your personal information, click here: [Your California Privacy Choices](#)

We may deny certain requests, or fulfill a request only in part, based on our legal rights and obligations. For example, we may retain personal information as permitted by law, such as for tax or other record keeping purposes, to maintain an active account, and to process transactions and facilitate customer requests. We will take reasonable steps to verify your identity prior to responding to your requests. The verification steps will vary depending on the sensitivity of the personal information and whether you have an account with us. California residents may designate an authorized agent to make a request on their behalf. When submitting the request, please ensure the authorized agent is identified as an authorized agent.

There may be circumstances where we cannot delete your personal information or direct service providers or contractors to delete your personal information from their records. Such instances include, without limitation, when the information at issue is maintained: (a) to enable solely internal uses that are reasonably aligned with your expectations based on your relationships with Havas and compatible with the context in which you provided the information, or (b) to comply with a legal obligation.

For purposes of exercising these rights, please note the following regarding how we collect and use your personal information as described in this policy notice, including in the previous 12 months:

- We may collect, and use for our business and commercial purposes, the following categories of personal information as set forth in applicable California law and described elsewhere in this privacy notice: Identifiers; characteristics of protected classifications under California or federal law; education information; professional or employment information; internet or other electronic network activity information; geolocation data; and inferences. We collect this personal information from the sources described above in this privacy notice.
- We may disclose each of the foregoing categories of personal information for the business purposes described in this Privacy Policy Notice to the extent permitted by applicable law.
- We disclose personal information to third parties in various ways as described in this Privacy Policy Notice. We do not currently consider the ways we disclose your personal information to comprise the “sale” or “sharing” of your information as defined in the CCPA. You can learn about ways in which you can control the collection of information about you through cookies and other tracking tools by reviewing the “Cookies and Other Technologies” section above.

We reserve the right to amend this notice at any time without advance notice. Please direct any questions about this notice to privacy.na@havas.com.

Note that for purposes of these rights, personal information does not include information we have collected as a service provider to our clients. If a request relates to services we performed as a service provider to our client, Consumers should make the request with our client directly.

PERSONAL DATA FROM THE EUROPEAN UNION AND SWITZERLAND

Most of the personal data collected and processed by Havas is stored inside the United States where it is under the jurisdiction of United States law, and

the United States government, courts, law enforcement or regulatory agencies may be able to obtain disclosure of your personal data under United States laws.

1. Onward Transfer

We may transfer personal data to companies that help us provide our service. Transfers to subsequent third parties are covered by the provisions in our Privacy Policy regarding notice and choice and the service agreements with our clients and our service providers. Havas complies with the European Union's General Data Protection Regulation (GDPR), for all onward transfers of personal data from the EU and Switzerland, including the onward transfer liability provisions.

2. Data Integrity

Havas limits the personal data it processes to that which is relevant for the purposes of the particular processing. Havas does not process personal data in ways that are incompatible with the purposes for which the information was collected or subsequently authorized by the relevant data subject. In addition, to the extent necessary for these purposes, Havas takes reasonable steps to ensure that the personal data the company processes is reliable for its intended use and accurate, complete and current. You may contact Havas as indicated below to request that Havas update or correct your personal data. Subject to applicable law, Havas retains personal data in a form that identifies or renders the individual identifiable only for as long as it serves a purpose that is compatible with the purposes for which it was collected or subsequently authorized by the data subject.

3. Access and Choice

Havas will provide you with reasonable access to your Data so that you may review what information we may have about you. If you have provided us with personal data, or it has come to us through third-parties, you may request a copy of your personal data, you may request that it be updated, modified or deleted, or you may request that its use and disclosure be limited, except where the burden or expense of providing access would be disproportionate to the risks to your privacy, or where the rights of other persons would be violated.

Requests may be sent to: privacy.na@havas.com

There may be other circumstances in which we may limit, or prevent, your access to your Data. Havas will keep track of individuals' choices and changes to those choices to ensure they are honored on a continuing basis.

If you are in the EU, you may withdraw your consent to Havas' processing of your personal data at any time, subject to certain legal or contractual restrictions and reasonable notice. Havas will inform you of the consequences of withdrawing your consent. In some cases, refusing to provide personal data or withdrawing consent for Havas to use or disclose your personal data could mean that you cannot participate in particular services or information for which it was collected. If you wish to withdraw your consent, please refer to the contact information in the "Enforcement and Dispute Resolution Regarding EU Personal Data" section below. However, there are a number of instances where Havas does not require your consent to engage in the processing or disclosure of personal data. Havas may not solicit your consent for the processing of personal data for those purposes which have a statutory basis, such as:

- To facilitate responding to an inquiry you have submitted
- The transfer or processing is necessary for the performance of a contract between you and Havas or one of its affiliates)
- The transfer or processing is necessary for the performance of a contract, concluded in your interest, between Havas (or one of its affiliates) and a third party
- The transfer or processing is necessary, or legally required, on important public interest grounds, for the establishment, exercise, or defense of legal claims, or to protect your vital interests, or
- The transfer or processing is required by applicable law

4. Enforcement and Dispute Resolution Regarding EU Personal Data

Havas commits to resolve complaints about our collection or use of your personal data. EU individuals with questions or complaints should first contact Havas at: privacy.na@havas.com

Alternatively, letters may be sent to the following address:

Patrick Burke
Chief Data & Privacy Officer
Havas Creative Network
200 Hudson Street
New York, New York 10013
Attn: Privacy

Any requests to opt-out of future communications from Havas, or to opt-out of a particular Havas program should be directed to Havas by email privacy.na@havas.com. All communications to Havas should include the individual's name and contact information (such as email address, phone number, or mailing address), and a detailed explanation of the request. Email requests to delete, amend, or correct personal data should include "Deletion Request" or "Amendment/Correction Request," as applicable, in the subject line of the email. Havas will endeavor to respond to all reasonable requests in a timely manner and, in any case, within any time limits prescribed by applicable local law.

Havas will promptly investigate and respond to complaints within 30 days of their receipt. Havas will attempt to resolve complaints, disputes and requests to revoke consent regarding collection, processing, transfer and disclosure of personal data in accordance with the principles contained in this Privacy Policy Notice. In certain situations, Havas may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

Havas will conduct periodic compliance audits of its relevant privacy practices to verify adherence to our Privacy Policy.

PERSONAL INFORMATION FROM CANADA

Havas operates in Canada and has Canadian customers, which results in the collection and processing of Canadian citizens' personal information in the same ways as described above from other jurisdictions, including that of our contractors, vendors, customers and consumers. Havas takes seriously its obligations to protect such personal information and to comply with Canada's Personal Information Protection and Electronic Documents Act ("PIPEDA") and PIPEDA's Principles of Fair Information Practices, subject to the oversight of the Office of the Privacy Commissioner of Canada.

Canadian individuals with questions or complaints regarding the collection, processing and transfer of their personal information in compliance with PIPEDA should first contact Havas by at: privacy.na@havas.com

Havas will promptly investigate and respond, and will attempt to resolve complaints, disputes and requests to revoke consent regarding collection, processing, transfer and disclosure of personal data in accordance with the principles contained in this Privacy Policy Notice, and the Principles of Fair Information Practices.

Havas will conduct periodic compliance audits of its relevant privacy practices to verify adherence to this Privacy Policy Notice.

1. Canada Personal Information Contact Information

Any questions or concerns regarding handling of personal information under Canada's PIPEDA, or related to revocation of consent to collect, process, transfer, or disclose their personal information should be directed by email to privacy.na@havas.com.

Any requests to opt-out of future communications from Havas, or to opt-out of a particular Havas program should be directed to Havas by email at privacy.na@havas.com.

Alternatively, letters may be sent to the following address:

Patrick Burke
Chief Data & Privacy Officer
Havas Creative Network
200 Hudson Street
New York, New York 10013
Attn: Privacy

All communications to Havas should include the individual's name and contact information (such as e-mail address, phone number, or mailing address), and a detailed explanation of the request. E-mail requests to delete, amend, or correct personal information should include "Deletion Request" or "Amendment/Correction Request," as applicable, in the subject line of the e-mail. Havas will endeavor to respond to all reasonable requests in a timely manner and, in any case, within any time limits prescribed by applicable local law.

THESE SITES ARE NOT INTENDED FOR CHILDREN

Our websites are meant for adults. We do not knowingly collect personal information from children under 18 without permission from a parent or guardian. If you are a parent or legal guardian and think your child under 18 has given us information, you can email us at privacy.na@havas.com.

You can also write to us at the address listed at the end of this policy. Please mark your inquiries "COPPA Information Request."

SECURITY

Havas takes reasonable and appropriate measures to protect personal information from loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into account the risks involved in the processing and the nature of the personal information.

We will keep your personal information only for as long as it is necessary or relevant for the practices described in this Privacy Notice and in accordance with our internal data retention policies. We also keep information as otherwise required by law.

WE MAY LINK TO THIRD PARTY SITES OR SERVICES WE DON'T CONTROL

If you click on a third-party link, you will be taken to a platform we do not control. This policy does not apply to the privacy practices of those third-party platforms. Read the privacy policy notices of other platforms carefully. We are not responsible for these third-party platforms.

HOW TO CONTACT US

If you have any questions or concerns about our use of your information, please email us at: privacy.na@havas.com

You can also write to us at:

Patrick Burke
Chief Data & Privacy Officer
Havas Creative Network
200 Hudson Street
New York, New York 10013
Attn: Privacy

UPDATES TO THIS PRIVACY POLICY NOTICE

Our Privacy Policy may change. We will post notice of any changes to the Privacy Policy on this page. Previous versions of this Privacy Policy Notice will be archived and made available to users.

Last Updated: December 2022