

Publicis Privacy Notice for Business-to-Business Activities

I. Introduction

This Publicis Privacy Notice for Business-to-Business Activities (“**Privacy Notice**”) describes how any affiliate of the Publicis Groupe SA, Paris Trade Register No. 542 080 601 (“**Publicis Groupe**”, “**Groupe**”, “**we**”, “**us**”, “**our**”) is processing Personal Data of Vendors, Clients and Shareholders. For the purposes of this Privacy Notice:

- representatives and/or employees as contact persons (data subjects) of a vendor or its subcontractor. Vendors are defined as an external natural or legal person/entity outside Publicis Groupe from whom Publicis Groupe obtains services (“**Vendors**”);
- representatives and/or employees as contact persons (data subjects) of a client or prospective client or its subcontractor. Clients are defined as an external natural or legal person/entity outside Publicis Groupe to whom Publicis Groupe provides a service (“**Client**”);

(hereinafter, “**you**”);

The Publicis Groupe legal entity, with which you have a contract, is generally responsible for processing your Personal Data and is considered the Data Controller. However, in some cases, a specific entity within our organization may also act as independent Data Controller due to our centralized structure. For processing activities such as procurement, billing, etc., our shared services centers known as “Re:Sources” operate as separate Data Controllers. Please see Annex 1 for the list of Re:Sources entities.

In addition to this Privacy Notice, more specific policies may apply to you as well as specific privacy terms in relation to the use of specific Publicis Groupe or local tools, websites, applications, etc. including, but not limited to:

- Vendor Inquiry Platform (VIP);
- Reporting Concerns program;
- Publicis Groupe’s website.

If you have any questions about the processing of your Personal Data, please contact the Publicis Groupe Chief Data Privacy Officer at [here](#).

II. What Personal Data do we collect and process?

Personal Data means any information relating to an identified or identifiable natural person (i.e. living individual).

We collect the following Personal Data about you:

- **Your general identification information** (such as name, surname);
- **Your general business information** (such as email and/or postal address, phone number, job title, position, department, name of company you work for);

- **Your electronic identification data** where required for the purpose of the provision of services to you (e.g., login, access right, passwords, IP address, online identifiers/cookies, system activity logs, access and connection times, voice recordings and meeting recordings);
- **Your personal payment information** (such as credit card, debit card, bank account number);
- **Inferences** such as information drawn from any of the information collected directly from you to create attributes about your preferences, characteristics, or behavior as it relates to our business relationship with you.
- **Any other information** necessary for the purposes of managing our relationship.

For Vendors, in only certain locations, we will collect on a voluntary basis and only where you provide us the information:

- **Your gender;**
- **Your veteran status;**
- **Your race and ethnicity; and**
- **Your sexual orientation.**

III. Principles for Handling Personal Data as a Controller

As part of our business-to-business relationships with our Vendors and our Clients, where we determine the purposes for which and how Personal Data is processed, Publicis Groupe may act as a Controller. For instance, Publicis Groupe shall be regarded as a data controller (i) when processing activities implemented with clients' Personal Data via the CRM and (ii) using communication tools to manage the relationship with you.

1. Purposes and legal basis for data processing

We always process your Personal Data for a specific purpose and only process to achieve that purpose. Note that the legal basis is not relevant for US residents.

Purpose	Legal basis
For Clients and potential clients	
Take steps in connection with the preparation of a contract with you, e.g., pitches, take part in request for proposal.	Performance of pre-contractual measures
Applying for and responding to calls for tender.	Legitimate interest
Provide you our services as defined in our contracts.	Performance of contractual measures
Manage our business relationship and performance of our contract with you (e.g., account and handling financial transactions management, providing customer service...).	Performance of contractual measures
Organize and manage our business to enhance operational efficiency, improve service delivery, and maintain a high standard of services.	Legitimate interest
Conducting market analyses, surveys, and developing marketing strategies.	Legitimate interest

Research, development, and improvement of products and services.	Legitimate interest
Engage with you, develop our professional relationship, inform you about Publicis news.	Legitimate interest
Improve our general knowledge of your expectations and our understanding of your needs or dissatisfactions.	Legitimate interest
Improve the training of our employees, better handle your requests and provide quality service.	Legitimate interest
Promoting our group and our work through various channels (e.g. sharing studies).	Legitimate interest
Enhance the planning and execution of external communication activities, including meetings and conferences.	Legitimate interest
Send direct marketing messages to potential clients.	In accordance with local laws. <i>France: Legitimate Interest</i> <i>Germany: Consent</i>
Targeting of advertisements relating to Publicis' services that are relevant to our potential clients and our clients (via advertising networks, social media, etc.)	Consent
For Vendors and Clients	
Achieve our corporate and social responsibility objectives, e.g., our "Working with Cancer" initiative, our carbon neutrality objectives.	Legitimate interest
Communicate with you to respond to your requests.	Performance of pre-contractual and contractual measures
Manage our invoices and payments to you.	Performance of contractual measures
Manage Publicis Groupe financial resources.	Legitimate interest
Operating our internal systems and tools, for example, operating, analyzing, improving, and securing these platforms.	Legitimate interest
Manage our global security framework through data back-up and infrastructure, including the provision of 'follow the sun' IT services and support in relation to our operations for our own purposes (e.g., data hosting maintenance, ticketing, security).	Legitimate interest
Manage our debt recovery operation and enhance its efficiency and effectiveness.	Legitimate interest
Processing your requests for the exercise of your privacy rights listed under Section VI of this Notice.	Legal obligation
Prevention of fraud or criminal activity, misuse of our products or services, and the security of our IT systems, architecture and networks.	Legitimate interest
When collected, we will use your racial and ethnic, gender, and sexual orientation information for diversity, equity, and inclusion initiatives and related programming.	Consent

For internal purposes, such as: internal research, internal operations, auditing, detecting security incidents, debugging, short-term and transient use, quality control, and legal compliance.	Legitimate Interest
Legal purposes, such as to: (a) comply with legal process or a regulatory investigation (e.g. regulatory authorities' investigation, subpoena, or court order); (b) enforce our Terms of Service, this Privacy Notice, or other contracts with you, including investigation of potential violations thereof; (c) respond to claims that any content violates the rights of other parties; and/or (d) protect the rights, property or personal safety of us, our platform, our customers, our agents and affiliates, its users and/or the public; and (e) satisfy legal or governmental reporting obligations. Such disclosure may be for a business purpose but may also be considered a "sale" under certain state privacy laws.	Legitimate Interest, performance of contractual measures, and compliance with legal obligation
In the event of a corporate transaction including for example a merger, investment, acquisition, reorganization, consolidation, bankruptcy, liquidation, or sale of some or all of our assets, or for purposes of due diligence connected with any such transaction.	Legitimate Interest and performance of contractual measures

We may aggregate, de-identify and/or anonymize any information collected so that such information can no longer be linked to you or your device ("Aggregate/De-Identified Information"). We may use Aggregate/De-Identified Information for any purpose, including without limitation for research and marketing purposes, and may also share such data with any other party, including advertisers, promotional partners, and sponsors, in our discretion, unless otherwise prohibited by applicable law.

You can send us a request to obtain additional information on the balancing tests we have performed to ensure we were able to process your Personal Data basing ourselves on the legitimate interest.

If the processing relies on consent and is subject to applicable laws allowing otherwise, you have the right to withdraw your consent at any time. The validity of processing conducted before the withdrawal of consent will remain unaffected.

IV. Recipient of the data and Data Transfers

Where appropriate and justified, your Personal Data may be shared with entities of the Publicis Groupe and its affiliates globally.

Publicis Groupe also uses entities of the Publicis Groupe and its affiliates as well as external providers which could access your Personal Data. These recipients provide services such as hosting, IT support, maintenance, ticketing, security, communication tools or technical means to help us process your Personal Data. These recipients are bound by written agreements that require them to provide at least the level of Personal Data protection required by this Privacy Notice and all services provided are in accordance with Publicis Groupe security policies.

In order to provide our Services, we may have to transfer Personal Data to countries outside the European Union (EU) and the European Economic Area (EEA). More specifically our servers are located in the United States (US) and France, and our processors operate around the world including the United States, Costa Rica, Mauritius and India, countries which do not provide adequate protection of Personal Data according to the EU Commission.

We have therefore taken appropriate and suitable safeguards to ensure that your Personal Data will remain protected when transferred outside EU/EEA. This includes implementing Standard Contractual Clauses adopted by the European Commission for transfers of Personal Data. Further information about our international transfers as well as the safeguards in place can be provided upon request.

The chart below shows with whom we disclose your Personal Data and for the specific business purpose(s).

Category of Personal Data	Categories of Parties with Whom We Disclosed Your Data for a Business Purpose	Business Purpose for the Disclosure
Contact Information and Identifiers	Service providers that manage or administer business related tools or systems	Conducting, administering, and retaining business related activities.
General Business Information	Service providers that manage or administer business related tools or systems and past, current, or future clients for business related matters	Conducting, administering, and retaining business related activities.
Internet or other electronic network activity information	Service providers that manage or administer business related tools or systems	Helping to ensure system security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for these purposes and debugging to identify and repair errors that impair existing intended functionality.
Personal Payment Information	Service providers that manage or administer business related tools or systems	Administering and managing payment processing services, including the processing of payments and any associated legal compliance.

Racial/Ethnic Data	Service providers that manage or administer business related tools or systems	Using for diversity, equity, and inclusion initiatives, programming, and reporting.
Gender	Service providers that manage or administer business related benefits, tools, or systems	Using for diversity, equity, and inclusion initiatives, programming, and reporting.
Sexual Orientation Information	Service providers that manage or administer business related tools or systems	Using for diversity, equity, and inclusion initiatives, programming, and reporting.
Inferences	Service providers that manage or administer business related tools or systems	Conducting, administering, and retaining business related activities.

V. In the EU and UK, your rights regarding your Personal Data

In accordance with applicable privacy law, you may exercise the following rights with respect to the Personal Data we hold about you by using this [LINK](#).

Right to information

You have the right to obtain clear, transparent, understandable and easily accessible information regarding how we use your Personal Data and regarding your rights. This is why we provide you such information in this Privacy Notice.

Right of access to your Personal Data

You can access all Personal Data we hold about you, know the origin of this Personal Data and obtain a copy in an understandable format.

You may also use your right to access your Personal Data to control the exactness of the data and have them rectified or deleted. You have no justification to provide to exercise your right to access.

Right to rectify your Personal Data

In order to avoid that inaccurate or incomplete Personal Data relating to you is processed or shared, you can ask us to rectify them.

Right to the deletion of your Personal Data

You may request the erasure or deletion of the Personal Data we hold about you. This is not an absolute right since we may have to keep your Personal Data for legal or legitimate reasons. You may, for example, exercise your right to deletion in the following cases:

- if you have withdrawn your consent to the processing (see below);
- if you legitimately objected to the processing of your data (see below);
- when data is not or is no longer necessary for the purposes for which it was initially collected or processed;
- If the data is processed unlawfully (e.g., publishing hacked data).

Right to object to the processing of your Personal Data

When we process your Personal Data based on our legitimate interest (to determine to which processing this applies, please refer to Section III of this Privacy Notice), you may at any time object to the processing of your Personal Data for reasons relating to your personal situation. We may nevertheless, on a case-by-case basis, reject such a request by pointing out the legitimate and imperious reasons justifying the processing of this data which prevail on your interests, rights and freedoms, or when this data is necessary to establish, exercise or defend a right before a court.

Right to limit the processing of your Personal Data

The right to limit the processing completes your other rights. This right means that the data processing relating to you and that we are performing is limited, so that we may keep this data, but we cannot use it or process it in any other manner.

This right applies in specific circumstances, i.e.:

- if you challenge the exactness of your Personal Data. The processing is then limited for a period of time so that the agency may verify the exactness of the Personal Data;
- if the processing is unlawful and you object to the erasure of your Personal Data and request instead that its use be limited;
- if we do not need the Personal Data for the purposes mentioned above in Section III anymore, but you still need it to establish, exercise or defend rights before a court; and
- in the cases where you objected to the processing which is based on the legitimate interests of the agency, you may ask to limit the processing for the time necessary for us to verify if we can accept your objection request (i.e., the time necessary to verify whether the legitimate reasons of the agency prevail over yours).

Right to portability of your Personal Data

You may request to retrieve the Personal Data you provided us with, in a structured, commonly used and machine-readable format, for personal use or to share them with a third party of your choice.

This right only applies to Personal Data you provided us with, directly or indirectly, and which was processed through automated means, if this processing is based on your consent or the performance of a contract. Please check the list of our Personal Data processing activities' legal grounds (in Section III (2.) of this Privacy Notice) to know whether our processing is based on the performance of a contract or on consent.

Right to withdraw consent at any time to the processing of Personal Data carried out on the basis of such consent

You may read Section II (1.) of this Privacy Notice in order to identify the purposes for which the processing of your Personal Data is based on your consent.

Right to give instructions on the fate of your Data after your death

You may define directives on the storing, erasure and sharing of your Personal Data after your death. This directive may be general, i.e. cover all your Personal Data, or specific, i.e. only cover certain data processing activities.

Modalities for the exercise of the rights of the data subject

If we have reasonable doubts as to your identity, we may ask you to attach any document enabling proof of your identity, in order to avoid any risk of impersonation.

We will respond without undue delay and in any event within one month from the data we receive your request. This timeframe can be extended by two months to take the complexity of the request or the number of requests received into account. In this case, we will inform you within one month from receiving your request, specifying the reasons for extending the response timeframe.

The third party you work for is also a data controller for your information. To exercise your data protection rights you may need to contact the third party you work for in relation to your personal information.

In any case, you also have the right to file a complaint with the competent data protection authorities, in addition to your rights above.

VI. For residents of certain US states, your rights and choices regarding your Personal Data

Please use this [LINK](#) if you want to make use of any of your below mentioned legal rights.

1. Right to request access to your Personal Data

You may request access to your Personal Data that we collect, use, or disclose. In particular, you may request:

- the specific pieces of Personal Data that we process about you
- the categories of Personal Data we have collected about you;
- the categories of sources from which the Personal Data was collected;
- the categories of Personal Data about you we disclosed for a business purpose or sold or shared;
- the categories of third parties to whom the Personal Data was disclosed for a business purpose or sold or shared; and
- the business or commercial purpose for processing the Personal Data.

When exercising the right to access Personal Data, you have the right to obtain materials in a portable and, to the extent technically feasible, readily usable format that allows You to transmit the data to another entity without hindrance. When we receive and verify your request to access

your Personal Data, we will make best efforts to fulfill your request unless an exception applies. You are permitted 2 access reports every 12 months.

2. Right to request deletion of your Personal Data

You may also request that we delete any Personal Data that we obtained about you. However, we may retain Personal Data for certain important purposes, as set out by applicable law. When we receive and verify your request to delete your Personal Data, we will proceed to delete the data unless an exception applies. We will retain a record of your deletion request in order to keep your Personal Data deleted, unless and until you provide consent for the processing of your Personal Data post your deletion request.

3. Right to correct your Personal Data

If you believe we hold inaccurate personal information about you, you may request that we correct that information. We may ask for documentation showing that the information you submit is accurate and the Personal Data we hold is inaccurate. Once we receive your request, we will verify your identity and taking into account the type of personal information and the purposes of our holding that personal information we will make best efforts to complete your request. We may deny your request if we determine that the contested Personal Data is more likely than not accurate. Additionally, we may choose to delete your Personal Data in response to your request to correct your Personal Data if the deletion of your Personal Data would not negatively impact you.

4. Right to limit the use and disclosure of your sensitive personal information

You may request that we limit the use and disclosure of your sensitive Personal Data. However, we may deny your request in part or in full under uses authorized by applicable law. You may exercise this right by using this [LINK](#).

5. Right to nondiscrimination

We will not deny, charge different prices for, or provide a different level of quality of goods or services if you choose to exercise your privacy rights.

6. Right to opt-out of the sale of your Personal Data or the sharing of your data for cross-contextual behavioral advertising

We do not sell or share any Personal Data as those terms are used in US state privacy laws like the California Consumer Privacy Act.

7. Right to opt-out of Automated Decision Making and Profiling

It's your right to not be subject to a decision based solely on automated decision making, including profiling, where the decision would have a legal effect on you or produce a similarly significant effect. You may opt-out of such processing of your Personal Data for profiling and other automated decision making by submitting your request [here](#).

US residents may exercise their applicable privacy rights by sending an email to [here](#), submitting your request [here](#), or by contacting us at 1-833-983-0087.

For security purposes (and as required under US state laws), we will verify your identity – in part by requesting certain information from you – when you make a request to access, correct, or

delete, your Personal Data. The verification process will utilize an email verification process, a telephone number verification process, and, if applicable, any assigned ID numbers.

If we are unable to complete your request fully for any reason, we will provide you additional information about the reasons why we could not comply with your request.

You may also designate an agent to make requests to exercise your rights under certain US state laws. We will take steps both to verify your identity and to verify that your agent has been authorized to make a request on your behalf by requesting your agent to provide us with a signed written authorization or a copy of a power of attorney executed by you.

VII. Children

Our business tools and systems are intended for our staff and business partners and are not directed at children. We do not knowingly collect Personal Data (as defined by the U.S. Children's Privacy Protection Act, or "COPPA") from children. If you are a parent or guardian and believe we have collected Personal Data in violation of COPPA, contact us at [here](#). We will remove the Personal Data in accordance with COPPA.

VIII. Data Retention Period

We retain your Personal Data only as long as necessary, in accordance with the applicable legal requirements for data retention and our internal policies, to fulfil the purpose for which it was collected. The data retention will vary depending on the type of data and the purposes of processing.

Your data will generally be retained for the duration of our contractual and/or pre-contractual relationship. After the contractual relationship has ended, your Personal Data will be archived for the duration of the applicable statute of limitations which, e.g., in France is:

- 5 years from the end of our contractual relationship
- Personal Data used for direct marketing purposes: 3 years from our last contact with you as a prospect or from the end of the contract if you are an existing client,
- 10 years for accounting-related documents such as invoices.

Otherwise, the criteria used to determine our retention periods include:

- the length of time we have an ongoing relationship with you or provide business related services to you;
- whether our processing of the Personal Data is consistent with what an average consumer would expect when the Personal Data was collected;
- whether the Personal Data is processed for any other disclosed purpose(s) compatible with what is reasonably expected by the average consumer;
- whether the Personal Data is relevant and useful to the provision of our services and our further processing is permitted by law;
- whether the Personal Data has been de-identified, anonymized, and/or aggregated; and
- whether there is a legal obligation to which we are subject.

In all instances, data may be retained for (a) an extended period if there exists a legal or regulatory requirement to do so, with deletion occurring once it is no longer needed for such purposes, or (b) a shorter period if the individual objects to the processing of their personal information and there is no longer a legitimate purpose for its retention.

IX. Data Security

We use a variety of methods, such as firewalls, intrusion detection software and manual security procedures, to secure your data against loss or damage and to help protect the accuracy and security of Personal Data and to prevent unauthorized access or improper use. If you think that any Personal Data is not secure or that there has been unauthorized access to the Website or your Personal Data, please contact [here](#) immediately.

X. Changes to this Privacy Notice

Publicis Groupe may amend this Privacy Notice from time to time by posting a new privacy notice in Publicis Groupe procurement systems or at our corporate website (in particular to take into account evolutions of the services offered as well as laws applicable to Publicis Groupe's activities). Please keep checking this Privacy Notice occasionally so that you are aware of any changes.

XI. Further information

This Privacy Notice has been designed to be accessible to people with disabilities. If you experience any difficulties accessing the information here, please contact us [here](#).

If you consider that we are not complying with this Privacy Notice, if you have any questions in relation to this Privacy Notice, or have questions about your rights and choices, please contact [here](#).

If you have any questions about our data practices or you wish to exercise your rights or know about the contractual protections in place, please contact the Publicis Chief Data Privacy Officer on [here](#) or, if you are in the US, call us at 1-833-983-0087.

Last Update: 10 September 2024

ANNEX 1: List of Publicis Re:Sources entities

Costa Rica: Lion Re:Sources, S.A.

France: Re:Sources France SASU

India: TLG India Ptv. Limited

Ireland: MMS Multi Euro Services DAC

Germany: Publicis Lion GmbH

Spain: Lion ReSources Iberia, S.L.U.

Poland: Starcom sp. z o.o.

UK: Lion Re:Sources UK Limited

USA: Lion Re:Sources, Inc.