

PUBLICIS COMMUNICATIONS AUSTRALIA PTY LTD

PRIVACY POLICY

This Privacy Policy is intended to inform you about how Publicis Communications Australia Pty Ltd (ABN 86 001 720 921) and its subsidiary business units, collectively referred to herein as "Publicis Communications", "we," "us," or "our", will deal with personal information it collects from individuals in the course of its business operations in Australia.

We are committed to respecting and protecting your privacy. If we collect or otherwise deal with your personal information in Australia, we will comply with the *Privacy Act 1988* (Cth), including the Australian Privacy Principles, and if we collect personal information in any other jurisdiction where we may be subject to privacy obligations in those jurisdictions, we shall comply with the relevant legislation and privacy requirements in those jurisdictions including the European Union ("EU") General Data Protection Regulation ("GDPR") where we process personal data relating to identifiable UK or EU residents.

By providing your personal information to us you consent to the collection, use, transfer and disclosure of your information under the terms of this Privacy Policy. We reserve the right to amend this Privacy Policy at any time without notice. Please review this Privacy Policy regularly so that you are updated on any changes.

Information we may collect from you

When you visit any of our websites or websites we control or operate (whether on our own behalf or on behalf of our clients) ("Site"), your browser automatically sends us an IP (Internet Protocol) address and certain other information known as clickstream data (including the type of browser you use, the address of the site you have come from and move to after your visit and the date and time of your visit). We may use this clickstream data to give you access to the Site and otherwise to administer the Site. For your convenience, our Site/s sometimes contain links to a number of other websites, outside of our control. The policies and procedures described here do not apply to those sites; we suggest contacting those sites directly for information on their data collection and distribution policies.

We only collect information about individuals that is necessary for us to carry on our business functions, or those of our clients on behalf of whom we may be collecting the information as the case may be. The kinds of information we collect include your full name, date of birth, email address, phone number, postal address, location details (suburb, postcode, country), and any other information you choose to provide to us. We will generally collect personally identifiable information from you when you knowingly provide it to us (unless it is unreasonable or impracticable to do so), including:

- when you communicate with us including by electronic means such as email, in person (eg via meetings), over the phone, fax or internet and information in material you send to us including requests for services, sending us questions or other communications, via your use of the services and normal dealings with us, or subscribing to receive updates or other communications from us;
- when you use products or technologies made available by us that allow for the provision of personal information;
- when you participate in a survey, promotion, offer, competition or other activity that we may conduct on our behalf or on behalf of our clients. In this respect, we may collect personal information from participants in the activity directly, or from other sources where permissible, or we may engage services of third parties (such as web hosts or developers) to collect personal information from participants for the relevant activity;
- in relation to recruitment or prospective employment with us including job applications, references and related materials.

You are responsible if you choose to provide personally identifying information to us (such as by including your name in the body of an email message). When you provide any personally identifying information to us, you affirm that you are knowingly and voluntarily providing us the information.

When contacting us, you have the option to either not identify yourself or to use a pseudonym. However, this will not apply if it is impracticable for us to communicate with you that way or if we are required or authorised under law (or a court or tribunal order) to only deal with individuals who have identified themselves.

Use of personal information

We will use your personal information for the reasons we collected it, for other related purposes and for our reasonable business purposes. For example, we may use your personal information to:

- Where personal information is collected from competitions/promotions/offers and similar activities on our behalf, to send you promotional and marketing material or for the purposes of coordinating the competition/promotion/offer or activity;
- To respond to your enquiries and provide you with information, products or services that you request from us, or which we feel may interest you;
- To send you promotional and marketing material which promotes our business and services, including if you have subscribed to receive updates or other communications from us, to send you updates or other communications including electronically, whether by newsletters, electronic direct mail or other means;
- To provide our services to you or companies or businesses you may represent;
- To carry out our obligations arising from any contracts entered into between you and us;
- To contact you for your views on our services and to notify you about changes or developments to our service;
- For research and analysis purposes including on product or site performance and user behaviour;
- To deal with any enquiries or complaints and for client support purposes;
- As required or authorised by law.

You are not obliged to provide your information however, the consequences of a failure to provide your information could result in you being unable to access all the features of our Site, or place an order for our products or services.

If you receive communications from us and no longer wish to, you can advise us at any time that you want to opt-out of receiving such communications.

Disclosure and storage of your information

We work to ensure that the personally identifying information you do intentionally provide us remains private. We will not sell, rent, or trade the personally identifying information you provide to anyone outside of Publicis Communications unless we are required to do so by law or we have obtained your consent. Please be aware, however, that it may be possible for others to read messages that you send over the Internet, so do not send by electronic communication any information that you would like to keep confidential.

We may also share such information with our affiliate companies and related bodies corporate worldwide, or any contractors (including IT service or data storage providers) or agents that we engage from time to time, and those entities will be obliged to protect your personal information pursuant to the Australian Privacy Principles and applicable law, and the provisions of this policy, as applicable.

For UK and EU residents, this means that your data will almost certainly be transferred outside of the European Economic Area ("EEA") when it is provided to us as we are based in Australia and our service providers store information overseas. Where your personal data is transferred by us to anyone else, we will ensure that this is only done with appropriate safeguards in place to protect personal data in compliance with applicable data protection legislation. Such measures may include (without limitation) transferring the data (i) to a third party in a country that has been identified as providing adequate protection for EEA data, or (ii) to a third party which has entered into standard contractual clauses adopted or approved by the European Commission, or (iii) to a third party in the US which is Privacy Shield certified.

Should you require more detailed information as regards transferring your personal data outside the EEA (e.g. the names of the recipients and the exact legal basis for any such transfer), please contact us on the contact details below.

For clarity, in the event we coordinate the collection of personal information on behalf of a client (e.g. for a competition/promotion/offer or similar activity), that client's privacy policy may apply, and you should refer to that client's privacy policy for further details on how the client may use, store and disclose your personal information.

Sensitive information

We will not collect use or disclose sensitive information (such as information about racial or ethnic origins or political or religious beliefs) except with your specific consent and where it is necessary for our specific business functions or activities, as required by law, or in the circumstances permitted in the Australian privacy legislation or other applicable legislation.

Retention of data

Except if your information is required to be retained by law or in accordance with our financial reporting obligations, we will hold your information for as long as we require it, or until you notify us that you no longer wish to hold your account, or for UK or EU residents, until you request that we erase your data.

Cookies

The use of cookies and other information is used on this Site to optimize the viewing experience, troubleshoot any problems and better serve content. A cookie is a piece of information that our web server may send to your machine when you visit our Site. The cookie is stored on your machine, but does not identify you or give us any information about your computer. A cookie helps us to recognise you when you re-visit our Site and to co-ordinate your access to different pages on the Site. With most Internet browsers, you can erase cookies from your computer hard drive, block all cookies, or receive a warning before a cookie is stored. If you want to do this, refer to your browser instructions or help screen to learn more.

Security, access and other rights

We will take all reasonable steps to:

- (a) ensure personal information we collect, use or disclose is accurate, complete and up to date;
- (b) protect personal information from misuse, interference, loss or unauthorised access, modification or disclosure; and to
- (c) destroy or permanently de-identify personal information if it is no longer needed for any purpose.

If you would like to access or correct personal information we hold about you, please contact our Managing Director Louie skinner on louie.skinner@saatchi.com.au. Please note that we may deny access or correction of personal information to you to the extent that: (i) providing access/correction would pose a serious threat to the life or health of any individual; (ii) providing access/correction would have an unreasonable impact upon the privacy of other individuals; (iii) your request for access/correction is frivolous or vexatious; or (iv) it is otherwise appropriate for us to deny access/correction in accordance with the applicable privacy laws. We may charge a reasonable fee for the cost of retrieving your information.

UK + EU residents also have the following additional rights:

- the right to request that we erase their personal data (right to be forgotten);
- the right to obtain a copy of their personal data on request;
- the right to transfer their personal data to another person or entity (right of data portability);
- the right to restrict or object to processing, or withdraw consent to processing; and
- the right to lodge a complaint with a supervisory authority (see below).

Complaints

If you are concerned that there may have been a breach of your rights or any rights under the *Privacy Act 1988* (Cth) or any other applicable privacy law or code, please contact us by calling +61 2 9006 2936.

We take such matters very seriously and, we shall review your complaint and respond to any concerns promptly, usually within fourteen (14) working days or any other period as required by relevant legislation.

You also have the right to make a complaint to the Office of the Australian Information Commissioner (see: <http://www.oaic.gov.au/privacy/privacy-complaints>) or the local regulator in your jurisdiction in Europe, as applicable.

This Privacy Policy applies to Publicis Communications only, and not to related bodies corporate which may have different privacy policies.

Updated June 2019.