

Privacy Notice

This Privacy Notice describes how M&C Saatchi Plc and its affiliates ("**M&C Saatchi Group**") processes your personal data, which is information relating to you from which you can be identified, either directly or indirectly this includes from third parties such as our affiliates but also partner companies that refer you to us.

We collect your personal data, or you provide it to us, through: (i) websites operated by us; (ii) our social media pages; and (iii) HTML-formatted email messages that we send to you that link to this Privacy Notice (collectively, the "**Services**"). For the purposes of this notice, we are the "controller" responsible for your personal data and "you" are the user or reader of our websites, social media pages, and emails.

This privacy notice is issued on behalf of the M&C Saatchi Group so when we mention the M&C Saatchi Group in this privacy notice, we are referring to the relevant company in the group that acts as controller of, and is responsible for, your personal data.

Please note that some privacy rights and obligations may differ in certain locations based on applicable data protection legislation. We have included supplemental information for certain jurisdictions at the end of this privacy notice.

WHAT PERSONAL DATA DO WE PROCESS, WHY AND FOR WHAT PURPOSES?

Personal data we process	Why do we process it?	What's our lawful basis?
Website Visitors		
<ul style="list-style-type: none"> Personal data that you provide to us when you contact us, for example your name, email address, continent, category of your query (new business/ media/ recruitment) and any extra information that you choose to tell or provide to us ("Communication Data") 	<ul style="list-style-type: none"> To respond appropriately to your comments and questions 	<ul style="list-style-type: none"> We do this as is necessary under our legitimate interest to run and administer our business, to provide you with information you have requested or to respond to queries from you
<ul style="list-style-type: none"> Email address and preferences Online identifiers (including IP address), device information and information about your visit to our website (including the full Uniform Resource Locators (URL)), clickstream to, through and from our website (including date and time), length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse away from the page) ("Device and Web Data") 	<ul style="list-style-type: none"> Where you sign up to our alert services To provide you with a safe, smooth, efficient, and customised experience on our website 	<ul style="list-style-type: none"> Where you have provided us with your consent to do so We do this as is necessary under our legitimate interest to provide, run and administer our website
<ul style="list-style-type: none"> Device and Web Data 	<ul style="list-style-type: none"> By using cookies to personalise your experience and understand how you interact with our website 	<ul style="list-style-type: none"> Where you have provided us with your consent to do so. For further information, please refer to our cookies notice.

<ul style="list-style-type: none"> • Device and Web Data 	<ul style="list-style-type: none"> • To ensure that the content on our website is presented in the most effective manner for you and your device 	<ul style="list-style-type: none"> • We do this as is necessary under our legitimate interest to provide you with content relevant to you in the most optimum format
<ul style="list-style-type: none"> • Device and Web Data 	<ul style="list-style-type: none"> • To administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes 	<ul style="list-style-type: none"> • We do this as is necessary under our legitimate interest to evaluate, develop and improve our services
<ul style="list-style-type: none"> • Device and Web Data 	<ul style="list-style-type: none"> • As part of our efforts to keep our website safe and secure 	<ul style="list-style-type: none"> • We do this as is necessary under our legitimate interest to maintain the security of our website
<ul style="list-style-type: none"> • Device and Web Data 	<ul style="list-style-type: none"> • By using web beacons to track whether you have opened our newsletter and to analyse how you have interacted with the links contained in our newsletter 	<ul style="list-style-type: none"> • Where you have provided us with your consent to do so
<ul style="list-style-type: none"> • Feedback and review information 	<ul style="list-style-type: none"> • Where we share with you market surveys or satisfaction questionnaires 	<ul style="list-style-type: none"> • Where you have provided us with your consent to do so
		<ul style="list-style-type: none"> • We do this as is necessary under our legitimate interests to develop the M&C Saatchi Group
Open House Users		
<ul style="list-style-type: none"> • Communications Data; • Device and Web Data; and • Information provided to us when you undertake one of our courses • Images uploaded to complete your profile 	<ul style="list-style-type: none"> • To process your order 	<ul style="list-style-type: none"> • Where necessary for performance of a contract with you
		<ul style="list-style-type: none"> • We do this as is necessary under our legitimate interest to provide our services to you
<ul style="list-style-type: none"> • Customer Data; and • Financial Data 	<ul style="list-style-type: none"> • To register and maintain your account 	<ul style="list-style-type: none"> • We do this as is necessary under our legitimate interest to provide our services to you
<ul style="list-style-type: none"> • Commercial Data as well as details that you provide to us about your interests and your 	<ul style="list-style-type: none"> • To analyse preferences, trends 	<ul style="list-style-type: none"> • We do this as is necessary under our legitimate interest to provide you with

<p>communication preferences as well as inferences drawn in order to create a profile about you to reflect your preferences, characteristics, behaviour and attitude ("Inferences and Preferences")</p> <ul style="list-style-type: none"> Please note that we do not use special category data to form the basis of the Inferences and Preferences data referred to above. In addition, the Inferences and Preferences data referred to above shall not constitute special category personal data 	<p>or statistics</p>	<p>information relevant to you and your requirements</p>
<ul style="list-style-type: none"> Your name, home address, personal email addresses, telephone number and information about your right to work in the relevant jurisdiction (for example, immigration status and proof of ID). ("Candidate Data") as well as login data to our candidate portal, CV, education and qualifications, employment history and references, interview notes and results of capability tests ("Application Data") 	<ul style="list-style-type: none"> To carry out recruitment activities (including to assess your skills, qualifications and suitability for the role and to communicate with you about the recruitment process) 	<ul style="list-style-type: none"> We do this as is necessary under our legitimate interest to assess your suitability for the role and to manage and administer the recruitment process effectively Where necessary to take steps to enter into a contract with you
<ul style="list-style-type: none"> Candidate Data 	<ul style="list-style-type: none"> To carry out any vetting checks, including right to work checks 	<ul style="list-style-type: none"> Where necessary to take steps to enter into a contract with you Compliance with a legal obligation
<ul style="list-style-type: none"> Where required or permitted by applicable law, criminal record check results ("Criminal Record Data") 	<ul style="list-style-type: none"> To carry out criminal record checks where permitted by applicable law 	<ul style="list-style-type: none"> Compliance with a legal obligation With respect to any criminal offence data: Where necessary for the purposes of carrying out our obligations as in connection with employment
<ul style="list-style-type: none"> Information relating to disabilities and any required reasonable adjustments ("Disability Data") 	<ul style="list-style-type: none"> To make reasonable adjustments to the interview process for you 	<ul style="list-style-type: none"> Compliance with a legal obligation With respect to any special category personal data: Where necessary for the purposes of carrying out our obligations as in connection

		with employment and the safeguarding of your fundamental rights
<ul style="list-style-type: none"> Equal opportunities monitoring information, including information relating to your race, ethnicity, sexual orientation and religious beliefs ("Equality and Diversity Data") 	<ul style="list-style-type: none"> For equal opportunity monitoring purposes 	<ul style="list-style-type: none"> We do this as is necessary under our legitimate interest to manage and monitor diversity, equality and inclusion efforts
		<ul style="list-style-type: none"> With respect to any special category personal data substantial public interest and the equality of opportunity or treatment

DISCLOSING YOUR INFORMATION

<ul style="list-style-type: none"> Communication Data 	<ul style="list-style-type: none"> Affiliates 	<ul style="list-style-type: none"> To ensure your request is processed by the appropriate party in accordance with your reasonable expectations 	<ul style="list-style-type: none"> We do this as necessary under our legitimate interest to process your request and ensure the appropriate party responds appropriately to you
	<ul style="list-style-type: none"> Third party service providers 	<ul style="list-style-type: none"> To ensure your request is processed by the appropriate party in accordance with your reasonable expectations 	<ul style="list-style-type: none"> We do this as necessary under our legitimate interest to process your request and ensure the appropriate party responds appropriately to you
	<ul style="list-style-type: none"> Regulators or other authorities 	<ul style="list-style-type: none"> Where we are required to do so to comply with our legal obligations 	<ul style="list-style-type: none"> Where we share personal data in order to comply with our legal obligations or to defend legal claims made against us
<ul style="list-style-type: none"> Device and Web Data 	<ul style="list-style-type: none"> Affiliates 	<ul style="list-style-type: none"> To administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes 	<p>We do this as necessary under our legitimate interest to:</p> <ul style="list-style-type: none"> provide, run and administer our website; provide you with content relevant to you in the most optimum format; evaluate, develop and improve our services; and maintain the security of our website
	<ul style="list-style-type: none"> Third party service providers 	<ul style="list-style-type: none"> To administer our website and for internal operations, 	<p>We do this as necessary under our legitimate interest to:</p> <ul style="list-style-type: none"> provide, run and

		including troubleshooting, data analysis, testing, research, statistical and survey purposes	<ul style="list-style-type: none"> administer our website; provide you with content relevant to you in the most optimum format; evaluate, develop and improve our services; and maintain the security of our website
	<ul style="list-style-type: none"> Third parties connected to corporate transactions 	<ul style="list-style-type: none"> In connection with any proposed or actual reorganisation, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of the M&C Saatchi Group. 	<ul style="list-style-type: none"> As necessary for our legitimate interests to ensure a business-as-usual approach following on from a corporate transaction.
	<ul style="list-style-type: none"> Regulators or other authorities 	<ul style="list-style-type: none"> Where we are required to do so to comply with our legal obligations 	<ul style="list-style-type: none"> Where we share personal data in order to comply with our legal obligations or to defend legal claims made against us
<ul style="list-style-type: none"> Candidate Data; Application Data; Criminal Record Data; Disability Data; and Equality and Diversity Data 	<ul style="list-style-type: none"> Affiliates 	<ul style="list-style-type: none"> To carry out recruitment activities (including to assess your skills, qualifications and suitability for the role and to communicate with you about the recruitment process) 	<ul style="list-style-type: none"> We do this as is necessary under our legitimate interest to assess your suitability for the role and to manage and administer the recruitment process effectively
	<ul style="list-style-type: none"> Third party service providers 	<ul style="list-style-type: none"> To carry out recruitment activities (including to assess your skills, qualifications and suitability for the role and to communicate with you about the recruitment process) 	<ul style="list-style-type: none"> We do this as is necessary under our legitimate interest to assess your suitability for the role and to manage and administer the recruitment process effectively
	<ul style="list-style-type: none"> Professional advisors, such as accountants, lawyers or auditors 	<ul style="list-style-type: none"> Where we are required to do so to comply with our legal obligations or to defend or protect our rights 	<ul style="list-style-type: none"> Where we are required to do so to comply with our legal obligations or to defend or protect our rights

	<ul style="list-style-type: none"> Regulators or other authorities 	<ul style="list-style-type: none"> Where we are required to do so to comply with our legal obligations or to defend or protect our rights 	<ul style="list-style-type: none"> Where we are required to do so to comply with our legal obligations or to defend or protect our rights
	<ul style="list-style-type: none"> Third parties connected to corporate transactions 	<ul style="list-style-type: none"> In connection with any proposed or actual reorganisation, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of the M&C Saatchi Group. 	<ul style="list-style-type: none"> As necessary for our legitimate interests to ensure a business-as-usual approach following on from a corporate transaction.

WHERE WE STORE YOUR PERSONAL DATA

Your personal data may be stored and processed in any country where we have facilities or in which we engage service providers, and by using the Services you consent to the transfer of information to countries outside of your country of residence which may have data protection rules that are different from those of your country. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access your personal data.

If you are located in the EEA: Some of the non-EEA countries are recognised by the European Commission as providing an adequate level of data protection according to EEA standards (the full list of these countries is available here: https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en)

For transfers from the EEA to countries not considered adequate by the European Commission, we have put in place adequate measures, such as standard contractual clauses adopted by the European Commission and binding corporate rules to protect your personal data. You may obtain a copy of these measures by contacting Legal@mcsaatchi.com.

HOW WE KEEP YOUR PERSONAL DATA

We take steps to ensure that the personal data that you provide is retained for only as long as it is necessary for the purpose for which it was collected. After this period, it will be deleted or in some cases anonymised. We may also keep a record of correspondence with you (for example if you have made a complaint) for as long as is necessary to protect us from a legal claim.

Where we have collected the personal data based on your consent and we have no other lawful basis to continue with that processing, if you subsequently withdraw your consent by using the contact details specified under the "Contact Us" section or otherwise, then we will delete your personal data. However, please note that where you unsubscribe from our marketing communications, we will keep a record of your email address to ensure we do not send you marketing emails in future.

YOUR RIGHTS

You have certain rights in relation to your personal data, which vary by jurisdiction. These include the right to object to the processing of your information for certain purposes, the right to withdraw your consent at any time, the right to access your personal data, and the ability to erase, restrict the processing of or receive a machine-readable copy of your personal data. You also have the right not to be subject to a solely automated decision in respect of your personal data except subject to certain conditions. We will handle any request to exercise your rights in accordance with applicable law and any relevant legal exemptions.

If you would like to review, correct, update, restrict or delete personal data that you have previously provided to us, or if you would like to receive an electronic copy of your personal data for purposes of transmitting it to another company (to the extent this right to data portability is provided to you by applicable law), you may contact us by emailing us at: Legal@mcsaatchi.com.

In your request, please make clear what personal data you would like to have changed, whether you would like to object to the processing of your personal data, withdraw your consent or otherwise let us know what rights you would like to exercise in relation to your personal data. For your protection, we may only implement requests with respect to the personal data associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable.

Please note that we may need to retain certain information for record keeping purposes. There may also be residual information that will remain within our databases and other records, which will not be removed.

You also have the right to complain to a data protection supervisory authority if you think we have processed your personal data in a manner which is unlawful or breaches your rights. If you have such concerns, we request that you initially contact us (using the contact details below) so that we can investigate, and hopefully resolve, your concerns. Contact details for the relevant data protection supervisory authorities are also set out below.

CHILDREN

Our website is not intended for, and should not be used by, children under the age of 16. The Services are not directed to individuals under the age of 16, and we do not knowingly collect personal data from individuals under 16.

CHANGES TO THIS PRIVACY NOTICE

We may change this Privacy Notice at any time. The new Privacy Notice will be displayed on our website and any changes will become effective when we post the revised Privacy Notice on the website. The date this Privacy Notice was last updated appears at the bottom.

CONTACT US

Questions and comments regarding this Privacy Notice should be sent to: Legal@mcsaatchi.com

Because email communications are not always secure, please do not include credit card or other sensitive information in your emails to us.

If you are located in the EEA, you also may:

- contact us at Legal@mcsaatchi.com with any questions about this Privacy Notice.
- lodge a complaint with a supervisory authority competent for your country or region. For example, where you are based in the UK, the relevant regulator is the ICO and you can make your complaint via the ICO's website [here](#).

Our registered offices are located at: M&C Saatchi plc at 36 Golden Square, London, W1F 9EE.

Last Updated: 11 December 2024

Annex 1: Local Jurisdictional Requirements

This Annex 1 sets out circumstances where local laws require additional measures to be taken that differ from these global principles.

1. Australia

We comply with the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (the Privacy Act). The APPs govern the way in which we collect, use, disclose, store, secure and dispose of your Personal Information. Personal Information is information or an opinion about an individual who is identified or who is reasonably identifiable.

A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at www.oaic.gov.au

TRANSFERS TO THIRD PARTIES OVERSEAS

We and our IT service providers store and process your personal information in Australia and overseas. We may disclose your personal information to service providers based in Europe, South Africa and India.

WHAT IS THE PROCESS FOR COMPLAINING ABOUT A BREACH OF PRIVACY?

If you believe that we have breached your privacy, please contact us as soon as possible using the contact details below and provide details of the incident so that we can investigate it. All complaints will be handled confidentially and will be thoroughly investigated. We will provide a response to you within a reasonable time, provided that we have all necessary information required to complete an investigation. In some cases, we may need to ask you to put your complaint in writing so that we are sure that we understand it, and may also need to ask you for further information or to verify your identity. We will attempt to confirm as appropriate and necessary with you your understanding of the conduct relevant to the complaint and what you expect as an outcome.

If you are dissatisfied with the outcome in respect of your rights or requests, please contact us. Alternatively, you may take your complaint to the Privacy Commissioner at the Office of the Australian Information Commissioner (OAIC). The contact details for the OAIC are available from the OAIC's website at www.oaic.gov.au.

COMPLAINTS AND ENQUIRIES

If you have any queries or complaints about our Privacy Notice, please contact us at:

Jennifer Hegarty, People & Culture Director

jennifer.hegarty@mcsaatchi.com.au

99 Macquarie St Sydney NSW 2000

61 + (02) 9019 6000

2. EEA & UK

International Transfers

If you are located in the EEA: Some of the non-EEA countries are recognised by the European Commission as providing an adequate level of data protection according to EEA standards (the full list of these countries is available here: https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en)

For transfers from the EEA to countries not considered adequate by the European Commission, we have put in place adequate measures, such as standard contractual clauses adopted by the European Commission and binding corporate rules to protect your personal data. You may obtain a copy of these measures by contacting Legal@mcsaatchi.com.

Right To Complain

Where you are in the EU, you may contact your local Supervisory Authority - a full list of Supervisory Authorities in the EU can be found [here](#). In the UK, the relevant regulator is the ICO and you can make your complaint via the ICO's website [here](#).