



II. THE PUBLICIS WAY TO CONDUCT BUSINESS WITH INTEGRITY

1. DATA *PRIVACY*

WHY?

Data privacy compliance is vital to our business and that of our clients. At Publicis, we are committed to the responsible use of data and to safeguarding the Sensitive and Personal Information of our employees and clients. **We respect privacy rights** and are dedicated to ensuring that Sensitive and Personal Information is handled strictly in accordance with the law.

FOR WHOM?

All employees as well as contractors, vendors and subcontractors.

WHAT?

We wish to maintain the highest possible standards of compliance to ensure that the Personal Information we handle is properly protected and that our internal procedures are designed to ensure compliance. We have developed a global data privacy program run by the Global Data Privacy Office (GDPO) to ensure that the Personal Information we collect and use is done so in accordance with applicable data privacy laws such as the General Data Protection Regulation (GDPR).

Personal Information

Personal Information may include information about employees, clients, prospects, suppliers, and other business contacts, as well as consumer-related information collected by us, or obtained from clients or third-party providers.

The information may identify individuals (“Personal Information”) or be anonymous. Examples of Personal Information are names, addresses, phone numbers, social security numbers or a user’s IP address.

Sensitive Personal Information

Sensitive Personal Information is information that relates to an individual’s health, sexual, racial, or religious status, trade union membership, or political affiliations.

As a general rule, we should not need to collect and use such Sensitive Personal Information for our legitimate business activities.

The collection and use of such information or the provision to us of such information by any supplier or client should be heavily scrutinized and challenged before proceeding. If provided by any supplier or client or collected by us, Sensitive Personal

Information should be treated with the highest degree of protection in accordance with the law and our internal policies and procedures and needs prior approval by the Groupe Chief Data Privacy Officer.

HOW?

Groupe Data Privacy Policies have been developed to ensure that:

- the Personal Information that is collected and used is done so in accordance with applicable data privacy laws.
- the Personal Information we hold on behalf of clients is properly protected so that we can help clients comply with their own obligations under the law.
- Requests from individuals for access to their own personal information are adequately managed.
- Requests from third parties for access to personal information are adequately managed.

As the laws and regulations vary according to jurisdiction, where there is any doubt, Business Units must seek advice from the Global Data Privacy Office (GDPO).

All Business Units in Countries must make sure that any use of Personal Information is lawful and in accordance with Publicis Groupe Global Data Privacy Program. All employees, contractors, vendors, and subcontractors dealing with Personal Information must be aware of the strict laws and regulations that apply to the collection, use, storage, and processing of such Personal Information and are expected to comply.

Contracts with clients and vendors must address legal and business issues related to Personal Information, including placing appropriate restrictions on the collection, treatment and use of data, applying confidentiality requirements, and identifying the rights in and restrictions associated with information in accordance with Groupe Data Privacy policies.

The IT department in each region is responsible for ensuring that the systems and infrastructure in place are sufficient to secure data and all Personal Information.

All Business Units in our Countries must adopt procedures and protocols for handling any unauthorized disclosure in accordance with the data privacy policies, procedures and tools developed by the GDPO as well as the security policies, procedures and guidance from the Global Security Office.

Groupe Chief Data Privacy Officer must be promptly informed of any formal enquiry from a data protection authority, from an individual about access of its Personal Information or of any unauthorized disclosure of information to third parties in line with the relevant policies and procedures.

WHO?

Business Unit and Country CEOs and CFOs and the Groupe Chief Data Privacy Officer.