

Privacy Notice

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This website (“Website”) provides information about the general business of, and the services offered by MSL (“MSL Group”). This Privacy Notice sets out how we collect, use, share, and protect any information we collect through this Website or any offline location that makes this Privacy Notice available to you.

Introduction

Any data collected through the Website, including personal information (as defined under applicable data protection laws, and as may be similarly referred to as “personal data” or “personally identifiable information” under applicable data protection laws), will be used for the purposes set out at II in this Privacy Notice and as set out in this Privacy Notice. Once collected, personal information will not be used for a different incompatible purpose without your consent. Notwithstanding, we may use information that does not identify you (including information that has been aggregated or de-identified) for any purpose except as prohibited by applicable law. For more information please see the “Aggregate, Deidentified, or Anonymized Information” section below. MSL is regarded as the data controller under certain laws with respect to personal information collected by MSL through this Website. However, MSL often acts as a data processor under certain laws when it processes personal information on behalf of a client, which is the controller. Any questions that you have relating to the processing of personal information by MSL as a processor should be directed to the relevant client.

Please read this Privacy Notice thoroughly. By using the Website, you agree to our **Terms of Service** and with our collection, use and disclosure practices, and other activities as described in this Privacy Notice. **If you disagree with**

the way personal information will be used, please do not use the Website or provide your personal information through the Website.

We may include links on the Website to other websites including social media platforms. This Privacy Notice only covers our data practices through the Website and does not cover the data practices of these other websites. When you interact with these other parties, including when you leave the Website, those parties may independently collect information about you and solicit information from you. The information collected and stored by those parties remains subject to their own policies and practices, including what information they share with us, your rights and choices on their services and devices, and whether they store information in the U.S. or elsewhere. We encourage you to read the privacy notices available on other websites you visit.

I. Information on behalf of MSL clients

We provide products and services to our clients and collect and process information about individuals (including through tracking technologies) at the direction of our client ("Client Data"). Client Data has historically included contact data, demographic data, content, service use data, device data, and location data, among other information. Our processing of Client Data is governed by the terms of our service agreements with our clients, and not this Privacy Notice. We are not responsible for how our clients treat the information we collect on their behalf, and we recommend you review their own privacy policies.

For more information on your rights and choices regarding client data, see the "Your rights regarding your information" section below.

II. What personal information do we collect and process through the Website?

The following describes the categories of personal information we collect and the sources of such personal information.

Identification and contact data, e.g., online identifiers; IP address; mobile ad identifiers.

First name, last name, e-mail address, telephone number, organization/company you represent, and title/position.

- We will collect this directly from you when you send us your questions or comments using the query form.
- We may also collect this from publicly available sources, data brokers, partners (e.g., that offer co-branded services, sell or distribute our products, or engage in joint marketing activities), advertising networks, internet service providers, data analytics providers, operating systems and social networks.

Categories of personal information described in Cal. Civ. Code § 1798.80(e). *e.g., signature.*

- We will collect this directly from you when you apply for a job with MSL.

Characteristics of protected classifications under California or US law

E.g., race; color; religion; sex/gender (includes pregnancy, childbirth, breastfeeding and/or related medical conditions); gender identity, gender expression; sexual orientation; marital status; medical condition; military or veteran status; national origin; ancestry; disability (mental or physical including HIV/AIDS, cancer, and genetic characteristics); genetic information; request for family care leave; request for leave for an employee's own serious health

condition; request for Pregnancy Disability Leave; retaliation for reporting patient abuse in tax-supported institutions; age (over 40).

- We will collect this directly from you when you apply for a job with MSL or in connection with surveys you have volunteered as a participant.

Commercial or transactions information

E.g., services considered, or other purchasing or consuming histories or tendencies

- We may also collect this from publicly available sources, data brokers, partners (e.g., that offer co-branded services, sell or distribute our products, or engage in joint marketing activities), advertising networks, internet service providers, data analytics providers, operating systems and social networks.

Internet or other electronic network activity information (Technical data)

E.g., browsing history; search history; online interests, such as information about categories of consumer interests derived from online usage; and information on a consumer's interaction with a website, application, or advertisement.

- We may also collect this from internet service providers, data analytics providers, operating systems and social networks.

Geolocation data *E.g., imprecise location data*

- We may also collect this from internet service providers, partners (e.g., that offer co-branded services, sell or distribute our products, or engage in joint marketing activities), data analytics providers, operating systems and social networks.

Employment Data *E.g.*, employment and education history, transcripts, writing samples, and references necessary to consider your job application for open positions.

- We will collect this directly from you when you apply for a job with MSL or in your capacity as a representative of a client or potential client.

Your verbatim communications to us or shared on the public areas of our site

- We will collect this directly from you when you send us your questions or comments using the query form

III. Purpose of data collection and legal grounds we rely on

The following provides information about our purposes for collecting your personal information:

Our purposes for collecting and using personal information:

To read and respond to your queries to us, sent using our online query form at <https://mslgroup.com/work-with-us>.

Basis for processing: Performance of a contract to which you are a party, if you contact us about our services, or our legitimate interest to respond to individuals' queries.

Our purposes for collecting and using personal information:

To conduct research, including focus groups and surveys.

Basis for processing: Consent, where you indicate that you want to participate in our research, focus groups, and/or surveys.

Our purposes for collecting and using personal information:

Marketing services, for example:

- Analyzing and optimizing our (or our service providers') proprietary databases or helping us identify and mitigate potential fraud.
- Providing "verification" or data "hygiene" services, which is how companies update and/or "clean" their databases by either verifying, removing, or correcting old, incorrect or outdated information.

Basis for processing: Consent

Our purposes for collecting and using personal information:

Operating our Website, for example:

- improving, testing, updating and verifying our own database.
- developing new products.
- operating, analyzing, improving, and securing our Website.

Basis for processing: Our legitimate interest to improve our services and develop new products

Our purposes for collecting and using personal information:

Other internal purposes, for example:

For internal research, internal operations, auditing, detecting security incidents, debugging, short-term and transient use, quality control, and legal compliance. We use the information collected from our own website for the above, as well as for our own marketing purposes.

Basis for processing: Our legitimate interest to support our internal operations and conduct research

In addition, we use analytics services, such as Google Analytics, to help us understand how users access and use the Website. In addition, we may work with agencies, advertisers, ad networks, and other technology services to place ads about our products and services on other websites and services. For example, we may place ads through Google and Facebook that you may view on their platforms as well as on other websites and services.

IV. With whom do we share personal information?

We will share your personal information for various business purposes with service providers and other parties as follows:

Sharing with other group entities or service providers: As a global organization, we share limited data with related entities and our affiliates or with selected service providers, either to benefit from additional support (technical or otherwise), or to provide you with services you have requested from us. We may permit our service providers to use information that does not identify you (including information that has been aggregated or de-identified) for any purpose except as prohibited by applicable law.

Vendors and Other Parties: We share information with vendors and other parties for analytics and advertising related purposes. These parties may act as our service providers, or in certain contexts, independently decide how to process your information. We encourage you to familiarize yourself with and consult their privacy policies and terms of use.

Affiliates: We share information with our affiliates and related entities, including where they act as our service providers or for their own internal purposes.

Clients: We share information with our clients in connection with the services we provide to them. For example, we share information with our clients in order to facilitate their orders, maintain and administer accounts, respond to questions, comply with requests, and otherwise comply with the law. Our clients

are independent entities, and their processing of information is subject to their own privacy policies.

Partners. We share information with our partners in connection with offering co-branded services, selling or distributing our products, or engaging in joint marketing activities.

Sharing for Legal Purposes: In addition, we may share personal information with other parties in order 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. We likewise may provide information to other companies and organizations (including law enforcement) for fraud protection, and spam/malware prevention, and similar purposes.

Sharing in the Event of a Corporate Transaction: We may also share personal information in the event of a major 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.

Aggregate, Deidentified, or Anonymised Information: We may aggregate, de-identify and/or anonymise 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.

Facilitating Requests: We share information at your request or direction.

Consent: We share information with notice to you and your consent.

V. Who is processing the personal information?

We have engaged processors that help with data analytics, marketing and advertising, website hosting, and technical support. The processing of the personal information by these parties is in accordance with our instructions.

If the services of other parties for the technical maintenance, administration or processing of data are required, the personal information will be accessed by these parties only to the extent that is required to ensure a smooth and secure technical handling of the Website and in compliance with applicable law, including with respect to data confidentiality, privacy and security.

For example, we have engaged Microsoft Azure to help with hosting the Website and data storage. The processing of personal information by Microsoft Azure is in accordance with our instructions. Microsoft Azure needs personal information to run the Website and to protect and improve its platform and services. Microsoft Azure analyzes the data in a de-identified form.

Employees of other Publicis Groupe agencies (e.g., from Sales, Marketing, Communications, IT, Operations, and Talent) process personal information for marketing efforts and talent acquisition purposes. Any processing of personal information by these employees is in accordance with our instructions.

VI. Your rights regarding your personal information

If you are a data subject in Europe, you may exercise the following legal rights regarding personal information that we hold about you.

- The right of access
- The right to rectification

- The right to erasure
- The right to object
- The right to restrict processing
- The right to data portability
- The right to withdraw your consent to the processing of your personal information at any time

Personal information will be stored in accordance with our applicable data retention requirements and corporate policies. The retention period for personal information varies depending on the type of personal information and the purposes of processing it.

If you are a data subject in Europe, and personal data about you has been processed by us as a processor on behalf of a client and you wish to exercise any rights you have with such personal data, please inquire with our client directly. If you wish to make your request directly to us, please provide the name of our client on whose behalf we processed your personal data. We will refer your request to that client and will support them to the extent required by applicable law in responding to your request.

Do Not Track: Your browser settings may allow you to automatically transmit a “Do Not Track” signal to online services you visit. Note, however, there is no industry consensus as to what site and app operators should do with regard to these signals. Accordingly, unless and until the law is interpreted to require us to do so, we do not monitor or take action with respect to “Do Not Track” signals. For more information on “Do Not Track,” visit <http://www.allaboutdnt.com>.

Analytics: Google provides tools to allow you to opt out of the use of certain information collected by Google Analytics at <https://tools.google.com/dlpage/gaoptout> and by Google Analytics for Display Advertising or the Google Display Network at <https://www.google.com/settings/ads/onweb/>.

The opt out will only apply to the specific browser or device from which you opt out. We are not responsible for the effectiveness of, or compliance with, any opt out options or programs, or the accuracy of any other entities' statements regarding their opt out options or programs.

VII. Viewing, Editing, Updating or Deletion of your personal information:

If you are a data subject in Europe, please contact privacyofficer@publicisgroupe.com if you want to see any personal information stored about you in our records. We will honor your legal right to view your personal information in accordance with applicable privacy law. If you think that any of the personal information collected through the Website is incorrect, confusing or incomplete, please contact privacyofficer@publicisgroupe.com. You may also ask us to erase, restrict or port your personal information and you may tell us if you object to our use of your personal information.

Personal information will be stored by us in accordance with our applicable data retention requirements and corporate policies.

VIII. Your California Rights and Choices

Our Website is intended to provide information to our business clients, job applicants, and employees. You understand and agree that information collected about you is solely within the context of (i) your role as an employee, job applicant, owner, director, officer, or contractor or (ii) MSL conducting due diligence regarding, or providing or receiving a product or service to or from, your employer. If you are a California resident, see the sections entitled "Information on behalf of MSL clients" above for information on how to exercise your rights.

We do not “sell” (as that term is defined in the CCPA) the personal information we collect in accordance with this Privacy Notice.

a. 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 these CCPA rights.

b. Shine the Light

Customers who are residents of California may request (i) a list of the categories of personal information disclosed by us to third parties during the immediately preceding calendar year for those third parties’ own direct marketing purposes; and (ii) a list of the categories of third parties to whom we disclosed such information. To exercise a request, please write us at the email or postal address set out in the “Further Information” section below and specify that you are making a “California Shine the Light Request.” We may require additional information from you to allow us to verify your identity and are only required to respond to requests once during any calendar year.

c. Authorized Agents

You may also designate an agent to make requests to exercise your rights under CCPA as described above. We will take steps both to verify the identity of the person seeking to exercise their rights as listed above, and to verify that your agent has been authorized to make a request on your behalf through providing us with a signed written authorization or a copy of a power of attorney.

IX. Children

The Website is intended for general audiences and is not directed at children. We do not knowingly collect personal information (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 information in

violation of COPPA, contacts us at privacycounsel@publicisgroupe.com We will remove the personal information in accordance with COPPA. We do not knowingly “sell,” as that term is defined under the CCPA, the personal information of minors under 16 years old who are California residents.

X. Data Security

We use a variety of methods, such as firewalls, intrusion detection software and manual security procedures, designed to secure your data against loss or damage and to help protect the accuracy and security of information and to prevent unauthorized access or improper use. Nevertheless, transmission via the internet is not completely secure and we cannot guarantee the security of information about you. If you think that the Website or any personal information is not secure or that there has been unauthorized access to the Website or your personal information, please contact privacycounsel@publicisgroupe.com immediately.

XI. Data Transfers

Your personal information is transferred to the US, which are not considered to have the same level of data protection as in the EU. However, we will provide appropriate safeguards (for example under intercompany agreements with appropriate contractual protections) where required by law.

XII. Use of cookies, other tracking technology, social media and social media plug-ins

Cookies are small pieces of text or code sent to your device when you visit the Website. Cookies are used to optimize the viewing experience, count visitors to a webpage, troubleshoot any problems, keep websites secure, and better serve content. The following cookies are used on the Website:

- *Functional and required cookies are always used to allow our hosting platform, to securely serve this Website to you.*
- *Analytics and performance cookies are used on the Website to view site traffic, activity, and other analytics data.*

Overall, cookies help us provide you with a better Website, by enabling us to monitor which pages you find useful and which you do not. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the Website.

For more information about the cookies dropped on your device, please review the [Cookie Policy](#).

If you engage with us on social media (for example, through our accounts on LinkedIn, Facebook, Twitter, or Instagram), we will also collect information about you in order to understand our followers better, understand the public response to our products and services, and to review your information as necessary to consider your job application for open positions. We may also use this information to contact you, send you marketing information which we think may be of interest to you, engage in social listening to identify and assess what is being said about us publicly to understand industry trends and market sentiment. Any information you provide to us when you engage with our content (such as through our brand page or via Facebook Messenger) is treated in accordance with this Privacy Notice. Also, if you publicly reference us or the Website on social media (such as by using a hashtag associated with us in a tweet or post), we may use your reference on or in connection with the Website.

We provide social media plug-ins on the Website to allow you to easily share content from our Website through social media, and in doing so, we may

receive your personal information from the social media platform that you have authorized to share with us.

We have no control over how social media platforms use your personal information and they may independently collect information about you when you leave our Website. The information collected and stored by those parties remains subject to their own policies and practices, including what information they share with us, your rights and choices on their services and devices, and whether they store information in the U.S. or elsewhere. We encourage you to read the privacy notices on the various social media platforms you use.

Find out more about how these social media platforms use your personal information:

- [Facebook](#)
- [Twitter](#)
- [YouTube](#) (Google's general privacy policy)
- [Instagram](#)
- [LinkedIn](#)

XIII. Notification of changes

We reserve the right to revise and reissue this Privacy Notice at any time. Any changes will be effective immediately upon posting of the revised Privacy Notice. Your continued use of the Website indicates your acknowledgement and acceptance to the Privacy Notice then posted. If the changes are material, and you have already provided personal information through the Website, we will contact you to inform you of the new Privacy Notice and, in some circumstances, where required by law, obtain your consent to the changes.

If you wish to save this text, please mark the entire statement (e.g. with your mouse) and copy-paste by pushing ctrl-c.

XIV. 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 at privacyofficer@publicisgroupe.com.

For further information on MSL please visit our website - www.mslgroup.com

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 privacyofficer@publicisgroupe.com. Data subjects in Europe may also lodge a formal complaint with their competent data protection authority.

If you have any questions about MSL's 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 at privacyofficer@publicisgroupe.com.