

## Arena Data Protection Policy

### 1. Arena commits to protect your personal data

Arena is committed to protect your personal data and your privacy. We encourage you to carefully read this Data Protection Policy.

This Data Protection Policy informs you of our data protection and privacy practices and the way your personal data are collected online and how that data is used by Arena. This policy will be readily available on our home page and at the bottom of each page of this Website.

Arena strongly supports the fundamental rights to privacy and Data Protection as well as compliance with national and international privacy laws.

Arena commits to maintain confidential any personal data and to strictly limit any disclosure in accordance with applicable local laws and regulations.

This policy is applicable to all Havas Group entities for the collection, processing, use, transmission, transfer and storage of personal data unless a national legislation imposes to some of them specific data protection rules.

### 2. How do we process your personal data?

Arena respects the rights of each individual or candidate to have his privacy and personal data protected. Arena will observe the following principles when processing your personal data:

1. Processing your personal data fairly, lawfully and in a transparent manner;
2. Collecting your personal data for specified, legitimate purposes and not processing further in ways incompatible with those purposes;
3. Collecting your personal data which is relevant to and not excessive for the purposes for which it is collected and used. We may render personal data anonymous when feasible and appropriate, depending on the nature of the data and the risks associated with the intended uses;

4. Maintaining your personal data accurate, and where necessary, kept up-to-date. We will take reasonable steps to rectify or delete data that is inaccurate or incomplete;
5. Keeping your personal data only as long as it is necessary for the purposes for which it was collected and processed;
6. Processing your personal data in accordance with the individual's legal rights;
7. Taking appropriate technical and organizational security measures to keep your data safe and prevent unauthorized access, unlawful processing, and unauthorized or accidental loss, destruction, or damage to personal data;
8. Processing your personal data only if it is lawful in accordance with a legal basis including if you have unambiguously given your consent to such process.

### 3. Why we collect your personal data?

Arena may collect personal data from you to complete following operations:

- profile creation;
- information requests;
- subscriptions to newsletters and sending those letters;
- job applications.

### 4. What data is collected?

Arena collects and uses your personal data with appropriate notice and consent when it is required, and after having informed you in a proper way.

Personal data means any information relating to an identified or identifiable natural person ('Data subject'). An identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

This Policy does not cover personal data rendered anonymous. Personal data is rendered anonymous if individual persons are no longer identifiable or are identifiable only with a

disproportionately large expense in time, cost, or work. If personal data rendered anonymous become no longer anonymous (i.e., individual persons are again identifiable), or if pseudonyms are used and allow identification of individual persons, then this Policy will again apply.

It is always up to you whether to pass personal data on us, although if you elect not to do so, we reserve the right not to register you as a user or not to provide you with any services.

The types of personal data we collect from you may include:

- your name, surname, age, company, email address, phone number;
- educational and employment background, and job interest data (for candidates);
- your Arena user ID and password (where applicable);
- IP address.

## 5. How we use your data?

We gather and use personal data for the following purposes:

Browsing and Searching: We collect certain personal data when you visit the website or click on the various links for services. We collect those data to improve your web user experience for your next visits (ex: country selection, language), to help run the sites more efficiently, to gather broad demographic information, to monitor the level of activity on the websites, and to evaluate the effectiveness of our advertising. See also our Cookies Policy for our use of cookies.

Newsletters and promotional e-mails: We collect personal data when you ask to receive newsletters. We use those data to provide you the information you request.

Contact information: If you contact us, we keep a record of your correspondence or comments, including personal data, in a file specific to you. We use these data to help us provide you better service in the event you contact us again.

Recruitment: we process personal information of candidates to manage the recruitment process.

We'll keep your personal data for the duration needed to complete the purpose for which they were collected.

## 6. What we do with your Personal data?

If you do disclose personal data to us, directly or not, we will:

- not sell or rent it to a third party without your permission
- take commercially reasonable precautions to protect the personal data from loss, misuse and unauthorized access, disclosure, alteration and destruction;
- not process the personal data except:

> in the aggregate with other data in such a way so that your identity cannot reasonably be determined (for example, statistical compilations);

> as required by law, for example, in response to a subpoena or search warrant;

> to outside auditors who have agreed to keep the data confidential;

> as necessary to protect the rights, safety, or property of Arena, its users, or others; this may include (for example) exchanging information with other organizations or public authorities for identification, fraud protection and/or risk reduction.

## 7. Your consent

By providing us with your personal data and/or using the websites and/or entering into a contract with us, you consent to our processing your personal data for the purposes described in article 3.

You also consent to our transferring your personal data to countries or jurisdictions which do not provide the same level of data protection as the EU, if necessary for the above purposes. If we do make such a transfer, we will provide appropriate safeguards to ensure that your personal data is duly protected. If you provide us with personal data about another person, you confirm that they have appointed you to act for them, to consent to the processing of their personal data including sensitive personal data and that you have informed them of our identity and the purposes (as set out above) for which their personal data will be processed. We do not process personal data of minors under 16 without the express consent of their parents or legal representatives.

## 8. Links to third-party websites

Arena websites or services may provide links to third-party applications, products, services, or websites for your convenience and information. If you access those links, you will leave the Arena website. Arena does not control those third-party websites or their privacy practices, which may differ from Arena practices. We do not endorse or make any representations about third-party websites. The personal data you choose to provide to or that is collected by these third parties are not covered by the Arena Data Protection Policy. We encourage you to review the privacy policy of any website you interact with before allowing the collection and use of your personal data.

We may also provide social media links that enable you to share data with your social networks and to interact with Arena on various social media sites. Your use of these links may result in the collection or sharing of data about you, depending on the feature. We encourage you to review the privacy policies and settings on the social media sites with which you interact to make sure you understand the data that may be collected, used, and shared by those sites.

If you post, comment, indicate interest, or share personal data, including photographs, to any public forum, social network, blog, or other such forum, please be aware that any personal data you submit can be read, viewed, collected, or used by other users of these forums, and could be used to contact you, send you unsolicited messages, or for purposes that neither you nor Arena have control over. Arena is not responsible for the personal data you choose to submit in these forums.

## 9. Your Data protection rights

- Right of access

As data subjects you may inquire as to the nature of the personal data Arena owned about you. You will be provided access to your personal data regardless of the location of the data processing and storage.

- Right to rectification

If your personal data is inaccurate or incomplete, you may request that the data be amended.

- Right to object

You have the right to object at any time to the processing of your personal data by Arena.

- Right to erasure

You can ask for the deletion of your personal data when it is allowed by applicable data protection laws and regulations.

- Right to restriction of processing

You have the right to require a restriction of the processing of your personal data when it is authorized by applicable data protection laws and regulations.

- Right to data portability

If you meet the conditions settled by the applicable data protection laws and regulation, you have the right to receive a subset of your personal data and to transmit them from Arena to another data controller.

You can also require the direct transmission from Arena to another controller when it is technically feasible.

- Right to lodge a complaint

You have the right to lodge complaint with the competent supervisory authority.

All requests for aforementioned rights, and any questions regarding this Data Protection Policy, may be sent to:

Havas Data Protection Officer  
Havas Group,  
29/30, quai de Dion Bouton, Puteaux Cedex 92800  
France  
[dpo@havas.com](mailto:dpo@havas.com)

## 10. Change in this Data Protection Policy

Arena reserves the right to modify this privacy statement as needed, for example, to comply with changes in laws, regulations, Arena practices and procedures, or requirements imposed by data protection authorities.

In this case, Arena will inform Arena candidates and other persons of any material changes in this policy. Arena will post all changes on relevant internal and external websites.

Last update: 16 April 2019