

Effective Date: June 19, 2020

**PRIVACY POLICY**  
**FOR**  
**HAVAS MEDIA GROUP USA AND HAVAS CANADA**

**INTRODUCTION**

This Privacy Policy describes how we collect, use, and share information about you on the sites where this Privacy Policy appears or where this privacy policy is referenced. This site is not directed to residents outside the United States or Canada and we do not intend to collect personal information from visitors outside the United States or Canada. Your use of this site indicates you acknowledge our collection, use and disclosure of your information as described in this Privacy Policy. If you disagree with the way we collect or handle your data, please do not use this website. Certain Havas websites and services may link to a different privacy policy; this Privacy Policy does not apply to any such websites or services. Please also note that we may collect, use, and share information about you as a service provider to advertisers and other clients; this Privacy Policy does not apply to that collection, use, or sharing. This Privacy Policy is not a contract and does not create any legal rights or obligations.

If you have any questions regarding our use of data, please contact [privacy.na@havasmedia.com](mailto:privacy.na@havasmedia.com).

**This Privacy Policy includes the following sections.** You should read the entire policy; however, you may use the links below to be directed to the information you are seeking or to see a summary of some key material in this policy. By providing us with Personal Information, or by using a website we link to this Privacy Policy, you consent to our collection, use, and disclosure of Personal Information as described in this Privacy Policy.

- **[We collect information about you.](#)** We may collect information including your contact information, information you provide when you contact us, demographic and educational information, and information about your location. We may also collect information about your use of our sites, such as IP address, the browser you use, device identifiers, and the site you reach us from and depart for.
- **[We collect information about you in different ways.](#)** We may collect information directly from you, using technological means, or from third parties such as our clients.
- **[We use your information in different ways.](#)** We use information for purposes including marketing, to respond to questions or solicitations, to communicate with you, to improve our products and services, to provide services to our clients, for security purposes, and as permitted or required by law.
- **[We share information with third parties.](#)** We may share information with other members of the Havas family, with third party service providers, with our business partners, with third parties for their marketing purposes, if required by law or to protect ourselves, or to a successor to our business.

- [\*\*You have choices about how we use your information.\*\*](#) You can opt-out of our commercial email and have the ability to control cookies and tracking tools. You may also turn off the GPS tracker on your mobile device.
- [\*\*Your California privacy rights.\*\*](#) If you are a resident of California, this section describes your rights under the CCPA.
- [\*\*Your Canadian privacy rights.\*\*](#) If you are a resident of Canada, you may ask to access your personal information or to have it corrected.
- [\*\*These sites are not intended for children.\*\*](#) If you are the parent of a child who has provided us with personal information, you can contact us.
- [\*\*We use standard security measures.\*\*](#) However, no security measures can provide 100% protection. We cannot promise your information will be completely safe.
- [\*\*We may transfer personal information to other countries.\*\*](#) As a result, this information may be accessed by governments of law enforcement in these countries according to their laws.
- [\*\*We may link to third party sites or services we don't control.\*\*](#) We are not responsible for the practices of these sites or services.
- [\*\*Contact us if you have more questions.\*\*](#)
- [\*\*Updates to this policy.\*\*](#) We may change this Privacy Policy.

## **WE COLLECT INFORMATION ABOUT YOU**

**We collect contact information.** For example, we may collect your name, mailing address, email address, and phone number.

**We collect information you submit.** We may collect information when you contact us, RSVP for an event, download a white paper, or submit an inquiry or job application, such as your current company, title, or resume.

**We collect demographic and education information.** If you apply for a job, you may volunteer to submit information like your gender, race, ethnicity, veteran status, or disability status. We may also collect your zip code or postal code.

**We collect browsing and usage information.** When you use our site, we may collect information about your interactions with the site, your IP address, and the browser you're using. We may look at what site you came from, or what site you visit when you leave us. We may collect device identifiers.

**We collect information about your location.** We may collect your location using your IP address. We may also collect your location using different types of technologies, including GPS and Wi-Fi.

## **WE COLLECT INFORMATION ABOUT YOU IN DIFFERENT WAYS**

**We collect information directly from you.** For example, we may collect information when you contact us or submit an inquiry or job application.

**We collect information from you passively.** We use tracking tools like browser cookies and web beacons to collect information about users over time when you use this site or our mobile site. We may have third parties collect information this way. To learn more about these tools and how you can control them, please see the “[Choices](#)” section below.

**We get information about you from other parties.** Our business partners, such as clients, service providers, and parent, affiliate and/or subsidiary agencies may give us information about you. Social media platforms may also give us information about you.

**We combine information.** For example, we may combine information that we have collected offline with information we collect online. Or we may combine information we get from a third party with information we already have.

## **WE USE YOUR INFORMATION IN DIFFERENT WAYS**

**We use information for marketing purposes.** For example, we might provide you with announcements or updates, or serve you ads about our events or services, both on our websites, and on third party sites. We might tell you about new features or updates to our offerings. These might be third party offers or products we think you might find interesting. We might send you emails or call you by phone. To learn about your choices for these communications, read the [Choices](#) section below.

**We use information to respond to requests or questions.** We may use information to respond to your inquiry, job application, or feedback.

**We use information to communicate with you.** We might contact you about this Privacy Policy, our Terms of Use, or other aspects of our relationship with you.

**We use information to improve our products and services.** We may use information to make our site better or enhance our product and service offerings.

**We use information for security purposes.** We may use your information to protect our agency and our sites. We may also use your information to protect our users or clients.

**We use information to provide services to our clients.** We may process your information for one of our customers or clients. For example, we may receive personal information from clients and use it to provide our services to them.

**We use information as otherwise permitted by law or as we may notify you.**

## **WE SHARE INFORMATION WITH THIRD PARTIES**

**We may share information within the Havas family of agencies.** This may include parent, affiliate, and/or subsidiary agencies and entities.

**We will share information with vendors that perform services on our behalf.** For example, we may share information with the companies that operate our site or conduct analytics for us. You can contact us if you want to learn more about how our service providers use your information.

**We may share information with our business partners.** For example, we may share information with third parties who collaborate on projects or co-host events with us.

**We may share information with third parties for their marketing purposes.** These third parties may include our clients and partners. They may also include third parties in whose products or services we believe you may be interested. These third parties may also share your information with others. These third parties may use the information for their own marketing purposes or the marketing purposes of others. This may include the delivery of interest-based advertising, both on our website and other websites.

**We will share information in order to comply with the law or to protect ourselves or third parties.** For example, we may share information to respond to a court order or subpoena. We may share it if a government agency or investigatory body requests.

**We may share information with any successor to all or part of our business.** For example, if part of our agency was sold, we may give our client and potential client list or any other personal information held by the affected portion of the business as part of that transaction.

**We may share information for other reasons that we may describe to you at the time of collection or to which we otherwise obtain your consent.**

## **YOU HAVE CHOICES ABOUT HOW WE USE YOUR INFORMATION**

**You can opt out of receiving our marketing emails.** To stop receiving our marketing emails, email us at [privacy.na@havas.com](mailto:privacy.na@havas.com) or follow the instructions in any marketing message you get from us. Even if you opt out of getting marketing messages, we will still send you transactional messages, such as responses to your questions or feedback.

**You can control certain cookies and tracking tools.** You may be able to block or remove cookies through your browser settings. You can delete cookies by going to the preferences, tools, or options menus of your browser. If you choose to do so, some features of the website may not function properly. Selections you make are device-specific and browser-specific, meaning that you may need to make your selections on each browser on each device you use to access the website. To control flash cookies, which we may use on certain sites from time to time, you can go [here](#). Why? Because flash cookies cannot be controlled through your browser settings. We use Google Analytics to better understand how our users interact with our websites. You can learn about Google Analytics' currently available opt-outs at <https://tools.google.com/dlpage/gaoptout/>.

The Self-Regulatory Program for Online Behavioral Advertising provides consumers with the ability to opt-out of having their online behavior recorded and used for online behavioral advertising purposes. Click [here](#) or [here](#) to opt out of having your online behavior collected for advertising purposes and receiving behaviorally targeted advertisements from our advertising partners. Selections you make are website-specific, device-specific and browser-specific, meaning that you may need to make your selections on each browser on each device you use to access the website.

**Our Do Not Track Policy:** Some browsers have “do not track” features that allow you to tell a website not to track you. These features are not all uniform. We do not currently respond to those signals. If you block cookies, certain features on our sites may not work. If you block or reject cookies, not all of the tracking described here will stop.

**You can control tools on your mobile devices.** For example, you can turn off the GPS locator on your phone or device.

## **YOUR CALIFORNIA PRIVACY RIGHTS**

For purposes of the California Consumer Privacy Act of 2018 (CCPA), we are generally a service provider to our clients. Additionally, our websites are generally intended to provide information to our business clients and those who would like to learn more about our company. In rare instances when we are not acting as service provider to our clients and you are a California resident who is not a business partner or seeking employment you may have additional rights under the CCPA. Please click [here](#) for additional information.

If you reside in California, you also have the right to ask us one time each year if we have shared personal information with third parties for their direct marketing purposes. To make a request, please send us an email, or write to us at the address listed in the Contact Us section below. Indicate in your letter that you are a California resident making a “Shine the Light” inquiry.

## **YOUR CANADIAN PRIVACY RIGHTS**

If you are a resident of Canada, please click [here](#) for additional information.

## **THESE SITES ARE NOT INTENDED FOR CHILDREN**

Our sites are meant for adults. We do not knowingly collect personal information from children under 18 without permission from a parent or guardian. If you are a parent or legal guardian and think your child under 18 has given us information, you can email us at [privacy.na@havas.com](mailto:privacy.na@havas.com). You can also write to us at the address listed at the end of this policy. Please mark your inquiries “COPPA Information Request.”

## **WE USE STANDARD SECURITY MEASURES**

The Internet is not 100% secure. We cannot promise that your use of our sites will be completely safe. We encourage you to use caution when using the Internet. This includes not sharing your passwords.

We keep personal information as long as it is necessary or relevant for the practices described in this Privacy Policy and in accordance with data retention policies. We also keep information as otherwise required by law. Personal information may be accessed by persons within our organization, or any of our third party service providers or the other persons described in this Privacy Policy, who require such access to carry out the purposes we describe in this Privacy Policy.

## **WE MAY TRANSFER PERSONAL INFORMATION TO OTHER COUNTRIES**

Some or all of the personal information we collect may be stored or processed on servers located outside your jurisdiction of residence, including in the United States, whose data protection laws may differ from the jurisdiction in which you live. As a result, this information may be subject to access requests from governments, courts, or law enforcement in those jurisdictions according to laws in those jurisdictions.

By providing us with personal information, you understand and expressly agree that we may transfer it outside of your jurisdiction of residence. If you do not agree to the transfer of your personal information outside of your jurisdiction of residence, do not provide us with Personal Information.

#### **WE MAY LINK TO THIRD PARTY SITES OR SERVICES WE DON'T CONTROL**

If you click on a third-party link, you will be taken to a platform we do not control. This policy does not apply to the privacy practices of those third-party platforms. Read the privacy policy of other platforms carefully. We are not responsible for these third party platforms.

#### **CONTACT US IF YOU HAVE MORE QUESTIONS**

If you have any questions about this Privacy Policy, please email us at [privacy.na@havasmedia.com](mailto:privacy.na@havasmedia.com).

You can also write to us or call at:

Havas  
Attn: Privacy  
200 Hudson Street  
New York, NY 10013  
(212) 886-4100

#### **UPDATES TO THIS POLICY**

From time to time we may change our privacy practices. We will notify you of any material changes to this policy by posting an updated copy on our site. Please check our site periodically for updates.

## YOUR CALIFORNIA PRIVACY RIGHTS

For purposes of the California Consumer Privacy Act of 2018 (CCPA), we are generally a service provider to our clients. Additionally, our websites are generally intended to provide information to our business clients and those who would like to learn more about our services such as job applicants. In rare instances in which we have not collected or processed personal information as a service provider or from job applicants, you as a California resident have the right to make the following requests with respect to your personal information:

- **Access** – You have the right to request that we disclose to you the categories of personal information we collected about you, the categories of sources from which we collected the personal information, the categories of personal information we sold or disclosed, our business or commercial purpose for collecting and selling the personal information, the categories of third parties with whom we shared the personal information, and the specific pieces of personal information we collected about you over the past 12 months.
- **Deletion** – You can request that we delete your personal information that we maintain about you, subject to certain exceptions.

Havas will not discriminate against you because you exercised any of these rights.

Note that for purposes of these rights, personal information does not include information about job applicants, employees and other of our personnel; information about employees and other representatives of third-party entities we may interact with; or information we have collected as a service provider to our clients.

California residents can exercise these rights online using the web form at the following [link](#) or by contacting us as set forth below. We may deny certain requests, or fulfill a request only in part, based on our legal rights and obligations. For example, we may retain personal information as permitted by law, such as for tax or other record keeping purposes, to maintain an active account, and to process transactions and facilitate customer requests. We will take reasonable steps to verify your identity prior to responding to your requests. The verification steps will vary depending on the sensitivity of the personal information and whether you have an account with us. For example, if you request a copy of the specific pieces of information we collected about you, we may require that you provide at least three pieces of personal information that match personal information we maintain, together with a signed declaration that you are the consumer whose personal information is subject of the request. California residents may designate an authorized agent to make a request on their behalf. When submitting the request, please ensure the authorized agent is identified as an authorized agent.

For purposes of exercising these rights, please note the following regarding how we collect and use your personal information as described in this policy, including in the previous 12 months:

- We may collect, use, and disclose for our business and commercial purposes as described in the “We Use Information” section above, the following categories of personal information as set forth in applicable California law: Identifiers; commercial information; payment and customer records information; characteristics of protected classifications under California or federal law, such as demographic information like age and gender; professional or employment information; education information; internet or other electronic network activity information; geolocation data; and inferences.

- We collect the above categories of personal information from the sources described in the “We Collect Information In Different Ways” section in this Privacy Policy.
- We may disclose each of the foregoing categories of personal information for the business and commercial purposes described in this Privacy Policy to the categories of third parties as described in this Privacy Policy, including to our parents, affiliates, and subsidiaries; service providers; business and advertising partners; vendors, including, advertising networks, data analytics providers, and social networks; and successors to our business. We may also disclose each of these categories in order to comply with the law or to protect ourselves or third parties as well as for other reasons we may describe to you at the time of collection or to which we otherwise obtain your consent.
- We share personal information with third parties in various ways as described in this Privacy Policy. We do not currently consider the ways we shared your personal information in the past 12 months to comprise the “sale” of your information as defined in the CCPA. You can learn about ways in which you can control the collection of information about you through cookies and other tracking tools by reviewing the Cookies and Other Technologies section in the Privacy Policy.

If you reside in California, you also have the right to ask us one time each year if we have shared personal information with third parties for their direct marketing purposes. To make a request, please send us an email, or write to us at the address listed in the Privacy Policy. Indicate in your letter that you are a California resident making a “Shine the Light” inquiry.

## **YOUR CANADIAN PRIVACY RIGHTS**

If you are a resident of Canada, you have a right to request access to your personal information and to request a correction to it if you believe it is inaccurate. If you have submitted personal information to us and would like to have access to it, or if you would like to have it corrected, please contact us using the information provided below. Please note that in some cases we may not be able to allow you to access certain personal information in certain circumstances, for example if it contains personal information of other persons or for legal reasons, including where the information is subject to legal privilege.

Typically, requests to access personal information that we process as a processor for one of our clients must be directed to that client.

We may ask you for information to allow us to confirm that the person making the request is you or is authorized to access your personal information before granting access. For example, we may require you to verify your identity before you access your personal information.

You have the right to refuse to provide or to withdraw your consent to processing of your personal information with effect for future processing. This would not affect processing where the applicable law allows us to process Personal Information without consent.