



The Interpublic Group of Companies, Inc.

September 2018

Client Pack

What we are doing to comply with the GDPR

On 25th May, 2018, a new EU data protection regulation - the General Data Protection Regulation (GDPR) - came into force. It is one of the most significant new pieces of privacy regulation in decades and directly impacts our industry.

At all IPG agencies, the privacy and security of our clients', employees' and consumers' personal data is incredibly important. So IPG has been working hard to address GDPR compliance – and this document is intended to explain to our clients:

- what we have done so far,
- what we are committed to doing in the future, and
- how we are helping our clients meet their GDPR obligations.

The GDPR applies to all businesses operating in the EU, but its reach will extend beyond the EU. So we are taking a global approach to responding to this new law.

1. IPG's GDPR Data Protection Officer ('DPO')

Our GDPR DPO for all of our agencies is Deborah Prince and her contact details are as follows:

Address	66 Prescott Street London E1 8HG
Email	GDPR.DPO@interpublic.com
Mobile	00 44 7773080536

2. Our GDPR Governance Structure

IPG has established a network of GDPR Champions, GDPR Leads, GDPR Sponsors and GDPR Project

Managers throughout the EU which covers all of our agencies.

To date we have over 200 trained GDPR Champions throughout the EU and we have plans to extend this network to other regions and markets outside the EU. Based in the business, all our GDPR Champions handle personal data routinely as part of their job – so they understand how we use data and the significance of the GDPR. This structure ensures we can surface issues or provide in-agency guidance quickly and efficiently.

Broadly, our GDPR Champions help drive the implementation and maintenance of IPG's GDPR Compliance Programme by:

- facilitating the awareness of data-focussed policies and practices amongst our staff,
- acting as a contact point on GDPR/data protection matters, and
- exchanging information and experiences on GDPR matters and compliance.

3. Our Compliance Programme

A centrally-managed GDPR compliance programme was initiated early in 2017, overseen by dedicated staff. A central objective of this programme is to ensure all IPG agencies provide GDPR-compliant processing services to our clients.

To date we have:

1. Documented our security practices: see **Our GDPR Security Technical Measures**.
2. Set up an in-agency GDPR governance structure comprising GDPR Champions (as described above).
3. Implemented an ongoing GDPR training and awareness raising programme, to ensure all staff, regardless of their specific role, are aware of basic GDPR requirements as they relate to our agencies and to reinforce the need to follow agency-approved data handling processes.
4. Appointed a DPO (see above).
5. Produced a guide for all clients describing the way that our agencies handle personal data on behalf of our clients: see **The way IPG Agencies will handle personal data for our clients**.

This document provides our clients, as data controllers, with information to help them draft privacy notices and privacy policies that are sufficient to obtain GDPR-compliant consent for data use or to help them establish if their current consents are adequate for the proposed purpose.

6. Documented key features of the data processing operations our agencies carry out for clients: see **Our Data Processing Operations – Key Features**. As with the above guides, this is aimed at keeping clients fully informed and, in particular, to help their compliance with Article 30 of the GDPR.

7. Created GDPR-compliant Data Processing Agreement templates that are appropriate for different services (e.g. media/programmatic advertising) for use with clients and vendors.
8. Carried out DPIAs in key areas of our business.
9. Adapted our established processes for data breach notification to comply with the GDPR.
10. Produced and disseminated a GDPR Vendor Pack to all Vendors so that they are clear on our and our client's expectations on GDPR compliance. Acceptance of the Vendor Pack is a prerequisite to working with us.

4. Our Training Programme

An extensive training and education programme is being delivered throughout all our agencies.

All-staff training: A GDPR e-learning initiative for all staff was launched in March for all staff based in the EU, US and other key regions. This has provided practical guidance on the application of the GDPR in day-to-day work, using examples of situations where handling of personal data is involved. By 25th May 2018 we had delivered training to over 20,000 staff.

Internal communications: Awareness-raising began in February 2018 throughout our EU agencies. Supported by our "Data Dude", regular communications and updates to all staff have been ongoing to ensure that GDPR is always front of mind when handling data and to embed our privacy by design culture.

Training and support for GDPR Champions: All IPG Champions are receiving a continuous flow of information and guidance, including updates, FAQs, webinars, industry views and position papers. An IPG Champions Forum took place in advance of 25th May 2018 to bring our 200-strong EU-wide community of GDPR Champions together to share ideas and experiences.

Specialist training: Specific in-house training programmes have begun to give in-depth training on key areas such as consent, profiling and programmatic media. Having established this foundation this training is incorporated into the new starters induction programme and follow up training in a variety of formats that has been delivered and will continue.