



The Interpublic Group of Companies, Inc.

September 2020

IPG GDPR Client Pack

The way IPG Agencies will handle personal data for our clients

Our clients, as data controllers, and our agency, as their appointed data processor, have obligations under the General Data Protection Regulation (GDPR). We have produced this document to explain to you, as our client, how we handle personal data on your behalf and to ensure you understand our approach. It sets out useful information to support your compliance with the GDPR as a controller and explains how we will support you as your appointed processor.

Security Measures, Confidentiality and Compliance

We will make sure that:

- we have appropriate security measures in place when handling personal data; and
- our employees fully understand and maintain the confidentiality of that personal data - only authorised account handlers will be permitted to handle each client's personal data.

We will always maintain up to date summaries of:

1. the security measures we apply to personal data;
2. our GDPR compliance, governance and training activities; and
3. key features of the data processing operations our agency carries out for clients.

We will provide these summaries to you when we are engaged to process personal data for you for the first time and periodically thereafter so that you are always aware of our practices. These summaries are called:

1. **“Our GDPR Security Technical Measures”**,
2. **“What we are doing to comply with the GDPR”** and
3. **“Our Data Processing Operations – Key Features”**.

Your Instructions

We typically agree detailed services for clients before our services begin – usually in a statement of work (SOW)

– and identify any data processing to be undertaken. We will only use personal data as instructed by you and in accordance with the law. If we think there is an issue with any instruction at any time, we will let you know.

What we will expect of you

As the data controller, where you provide us with the personal data of EU residents we will require you to have established that there are lawful grounds for us to process the data before you provide it to us. In addition, where you are asking us to engage with individuals on your behalf and acquire their data for your marketing or other purposes, we require you to provide any privacy notice or policy used to obtain any necessary consents from those individuals. Our agencies cannot know all your long term aims, so, at the same time as being a legal obligation imposed on you as a data controller, this also makes good commercial sense.

Consent

Transparency is key when obtaining consent to use personal data. To achieve this, we understand that it is necessary to provide individuals with clear and unambiguous explanations of the potential use of the data so that the consent obtained is informed consent. To help with this we will provide appropriate use cases and summaries of data usage so that you - or any other data collectors - will have the knowledge and understanding needed to fully and clearly explain potential data usage to individuals at the time of obtaining consent and also to help assess whether any consent already obtained can be used for the intended project.

Where we broker the use of personal data on your behalf – for example for online targeted ad-serving - we will seek assurances from the data provider that you can use that data lawfully for your purposes (through consent or otherwise) – even though we are unlikely to receive the personal data ourselves or process it in any way. We will also endeavour to provide explanations of how they operate so that you are clear on what and how data may be used and you can include any relevant details in your privacy notices and policies.

Sub-processing

Sub-processing within our Agency Network: We may sometimes ask that you consent to us sharing or transferring personal data to other agencies in our group. We are part of a global network that has operations in a number of EU countries and beyond. To help us provide the best service to you we sometimes need to work closely with other companies in our group. All companies in our group are expected to handle personal data to the same standards so we can give you peace of mind that any personal data used within our group is being processed in accordance with your instructions and all relevant laws, including the GDPR.

Outside our Agency Network: Outside our group, we will routinely obtain your consent before appointing an external sub-processor – save as set out below.

Media Services: A significant area where pre-notification of all sub-processors is difficult – if not impossible - is for certain online advertising/media services. This is because - for these services - sub-processors are appointed following a successful real-time bid for advertising space on a publisher's website and the advertisement is then

published immediately after that successful bid. Given the split-second speed of this process and, obviously, being unable to predict the outcome of the bidding process, it is impossible for clients to be given advance notice of the identity of the ultimate publishers and data processors and, therefore, the right of pre-approval. So, where advance identification of processors or sub-processors is problematic, we will endeavour to provide clear explanations of how such services operate. In this way, you, as the data controller, can fully understand what and how personal data may be acquired or used by sub-processors when we are delivering those services.

Processors/Sub-processors with Non-Negotiable Terms: Some third party processors/sub-processors will only provide their services under non-negotiable contractual terms – we call these third parties Fixed Term Vendors or FTVs. And often these FTVs are critical to the provision of certain advertising services, for example, Google and Facebook for online advertising/media services. Where an FTV is to be appointed, we will provide you with their details and assist you in ascertaining their contractual terms. Unless you object, their appointment and terms of business will be deemed approved and accepted by you, and our liability and obligations will be limited to and not exceed those of the FTV in respect of the data processing carried out by them for you.

Transfers outside the EEA

We will not transfer personal data to any third party who we believe will either use or transfer that data outside of the EEA unless an adequate level of protection is provided through Privacy Shield, EU Model Clauses or an equivalent mechanism. We will pass on this requirement, and all other compliance requirements, to any sub-processors we may appoint to provide services to you.

Our DPO

You can always find details of the DPO appointed to act on our behalf in relation to the GDPR in our document: **“What we are doing to comply with the GDPR”**.

Your obligations and our help

As a controller, you have a range of obligations including: to respond to data subjects’ requests; adhering to strict reporting requirements in the highly unfortunate event of a data breach; establishing when a data processing impact assessment (DPIA) is needed, and carrying out DPIAs.

We, as your processors, are committed to assisting you: we will respond to all requests for changes; react promptly and professionally to any breach to keep you fully informed; provide information about the way we process data for you; and respond to audit requests.

In relation to requests from individuals, we hope to significantly reduce the need for us to make changes to personal data through our ways of working. For each project we will ensure the accuracy of the data by only using the up to date personal data provided by you or acquired on your behalf, and then deleting that data once the project has ended and there is no justification for us to keep it. If requested, we will provide you with a copy of that personal data prior to deletion.

IPG Agencies GDPR Security Technical and Organisational Measures

1. Physical access control

Technical and organisational measures to prevent unauthorized persons from gaining access to the data processing systems available in premises and facilities (including databases, application servers and related hardware) where Personal Data are processed, include: Establishing security areas, restriction of access paths;

- Establishing access authorisations for employees and third parties;
- Access control system (ID reader, magnetic card, chip card);
- Key management, card-keys procedures;
- Door locking (electric door openers etc.);
- Security staff, janitors;
- Surveillance facilities, video/CCTV monitor, alarm system;
- Securing decentralised data processing equipment and personal computers.

2. Virtual access control

Technical and organisational measures to prevent data processing systems from being used by unauthorised persons include:

- User identification and authentication procedures;
- ID/password security procedures (special characters, minimum length, change of password);
- Automatic blocking (e.g. password or timeout);
- Monitoring of break-in-attempts and automatic turn-off of the user ID upon several erroneous passwords attempts;
- Creation of one master record per user, user master data procedures, per data processing environment;
- Encryption of archived data media.

3. Data access control

Technical and organisational measures to ensure that persons entitled to use a data processing system gain access only to such Personal Data in accordance with their access rights, and that Personal Data cannot be read,

copied, modified or deleted without authorisation, include:

- Internal policies and procedures;
- Control authorisation schemes;
- Differentiated access rights (profiles, roles, transactions and objects);
- Monitoring and logging of accesses;
- Disciplinary action against employees who access Personal Data without authorisation;
- Reports of access;
- Access procedure;
- Change procedure;
- Deletion procedure;
- Encryption.

4. Disclosure control

Technical and organisational measures to ensure that Personal Data cannot be read, copied, modified or deleted without authorisation during electronic transmission, transport or storage on storage media (manual or electronic), and that it can be verified to which companies or other legal entities Personal Data are disclosed, include:

- Encryption/tunnelling;
- Logging;
- Transport security.

5. Control of instructions

Technical and organisational measures to ensure that Personal Data are processed solely in accordance with the Instructions of the Controller include:

- Unambiguous wording of the contract;
- Formal commissioning (request form or Statement of Work);
- Criteria for selecting any Sub-Processor.

6. Availability control

Technical and organisational measures to ensure that Personal Data are protected against accidental destruction or loss (physical/logical) include:

- Backup procedures;
- Mirroring of hard disks (e.g. RAID technology);
- Uninterruptible power supply (UPS);
- Remote storage;
- Anti-virus/firewall systems;
- Disaster recovery plan.

7. Separation control

Technical and organisational measures to ensure that Personal Data collected for different purposes can be processed separately include:

- Separation of databases;
- “Internal client” concept / limitation of use;
- Segregation of functions (production/testing);
- Procedures for storage, amendment, deletion, transmission of data for different purposes.

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 current DPO for both the UK and EU is Orla Isaacson and her contact details are as follows:

Email	UK GDPR DPO: uk.dpo@interpublic.com EU GDPR DPO: gdpr.dpo@interpublic.com
Mobile	00447855062706

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-focused 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.

IPG Agencies Data Processing Operations – Key Features

This document outlines the key features of the data processing activities undertaken as part of our Advertising Services. The document is divided into two sections; the first covers our Typical Advertising Services, whilst the second summarises our Specialist Services - Pharmaceutical and Medical.

I. Typical Advertising Services:

1. Competitions
2. Customer relationship management
3. Customer relationship management (programmatic search and social)
4. Digital buying
5. Direct marketing
6. Employee Engagement
7. Events Administration
8. Experiential
9. Hospitality Management
10. Insights and activation for target audiences
11. Lobbying
12. Programmatic Services
13. Provision of services, including billing
14. Public Relations
15. Research & Insights: Qualitative Research
16. Research & Insights: Listening Services
17. Sales promotion administration
18. Search: Targeted Advertising
19. Search: Digital Marketing
20. Social Media Management and Maintenance
21. Social Media Services
22. Talent Management
23. Technology Development (Apps, Websites, Social Media)

II. Specialist Services – Pharmaceutical and Medical:

24. External Expert Engagement
 25. Market Research (Interviews/Insight/Consultancy)
 26. Meetings & Events
 27. Publications
 28. Technology Development (Apps, Websites, Social Media)
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I. Typical Advertising Services:

1. Competitions			
PURPOSE OF PROCESSING	CATEGORIES OF DATA SUBJECT	CATEGORIES OF PERSONAL DATA	PROCESSING OPERATION
<p>To provide competitions, promotional events and information to data subjects on behalf of the Client.</p> <p>To provide payments and/or prizes to fulfil a contractual obligation on behalf of the Client.</p>	<p>Individuals attending Client events or participating in promotional activities.</p> <p>Client customers or prospective customers.</p> <p>Talent and Client Brand Ambassadors.</p> <p>Consumers providing customer insight in respect of consumer products or services.</p>	<p>Identifying information: Name, personal contact details (including address, telephone and mobile numbers and email address), place of work, job title, employment contact details (including address, telephone and mobile numbers and email address), age, gender, physical characteristics, preferences.</p> <p>Other: Invoicing and billing information and personal preferences.</p> <p>Special categories: only where necessary to provide the services described in the MSA and/ corresponding SOW. (Religion, health data e.g. dietary or accessibility requirements).</p>	<p>Using contact details to provide competitions and marketing communications.</p> <p>Using contact and bank details to fulfil a contractual obligation e.g. providing a service or product, or prize to consumers, making payment to talent or contractors.</p> <p>Using contact and personal details to provide hospitality/travel/accommodation arrangements.</p>
DURATION OF PROCESSING	The Personal Data will be processed by the Agency for the duration of the Agreement, Services or part thereof or in accordance with applicable law.		

2. Customer Relationship Management			
PURPOSE OF PROCESSING	CATEGORIES OF DATA SUBJECT	CATEGORIES OF PERSONAL DATA	PROCESSING OPERATION
Customer relationship management.	Client customers, potential client customers.	Name, address, email address, phone number – home or mobile, preferences. Special categories: None.	Customer relationship management.
DURATION OF PROCESSING	The Personal Data will be processed by the Agency for the duration of the Agreement, Services or part thereof or in accordance with applicable law.		

3. Customer Relation Management (Programmatic Search And Social)			
PURPOSE OF PROCESSING	CATEGORIES OF DATA SUBJECT	CATEGORIES OF PERSONAL DATA	PROCESSING OPERATION
CRM on boarding for programmatic search and social.	Client to Agency: Client customers or prospective customers visiting client websites. Client to Technology Vendors contracted through Agency: Client customers or prospective customers visiting client websites.	Client to Agency: Name, email address, post code, date of birth, age, gender, mobile number, mobile device ID, online identifier, preferences. Client to Technology Vendors contracted through Agency: Name, email address, post code, date of birth, age, gender, mobile number, mobile device ID, online identifier. Special categories: None.	Client to Agency: Collection, logging, organisation, storage, adaptation, analysis, profiling, use, disclosure by transmission, restricted access, alignment & combination and erasure. Client to Technology Vendors contracted through Agency: Collection, logging, organisation, storage, adaptation, analysis, profiling, use, disclosure by transmission, alignment & combination, erasure, retrieval and dissemination.
DURATION OF PROCESSING	Client to Agency: duration of the services or in accordance with applicable law. Client to Technology Vendors contracted through Agency: duration of the Agreement, Services or in accordance with applicable law.		

4. Digital Buying			
PURPOSE OF PROCESSING	CATEGORIES OF DATA SUBJECT	CATEGORIES OF PERSONAL DATA	PROCESSING OPERATION
Providing digital campaign reporting and analysis.	Client to Technology Vendors contracted through Agency: Client customers or prospective customers visiting client websites or publishers website on which the Client's ad is served.	Client to Technology Vendors contracted through Agency: IP Addresses, cookies IDs, location data (incl. Latitude & Longitude, postcode, mobile GPS location), mobile device ID, preferences. Special categories: None.	Client to Technology Vendors contracted through Agency: Collection, logging, organisation, storage, adaptation, analysis, use, disclosure by transmission, alignment & combination, erasure, retrieval and dissemination.
DURATION OF PROCESSING	Client to Technology Vendors contracted through Agency: duration of the Agreement, Services or in accordance with applicable law.		

5. Direct Marketing			
PURPOSE OF PROCESSING	CATEGORIES OF DATA SUBJECT	CATEGORIES OF PERSONAL DATA	PROCESSING OPERATION
Delivering direct marketing to Client customers or potential customers.	Client customers, potential client customers.	Name, address, email address, phone number – home or mobile, lifestyle information and preferences. Special categories: None.	Using contact details to provide marketing communications.
DURATION OF PROCESSING	The Personal Data will be processed by the Agency for the duration of the Agreement, Services or part thereof or in accordance with applicable law.		

6. Employee Engagement

PURPOSE OF PROCESSING	CATEGORIES OF DATA SUBJECT	CATEGORIES OF PERSONAL DATA	PROCESSING OPERATION
<p>To provide engagement materials and information to of Client employees or prospective employees.</p>	<p>Client employees or prospective employees.</p>	<p>Identifying information: Name, social media account name, personal contact details (including address, telephone and mobile numbers and email address), place of work, job title, employment contact details (including address, telephone and mobile numbers and email address), age, gender, physical characteristics.</p> <p>Other: Invoicing and billing information and personal preferences.</p> <p>Special categories: only where necessary to provide the services described in the MSA and/ corresponding SOW. (Religion, health data and nationality).</p>	<p>Using contact details to provide employee or prospective employee engagement communications.</p>
<p>DURATION OF PROCESSING</p>	<p>The Personal Data will be processed by the Agency for the duration of the Agreement, Services or part thereof or in accordance with applicable law.</p>		

7. Events Administration			
PURPOSE OF PROCESSING	CATEGORIES OF DATA SUBJECT	CATEGORIES OF PERSONAL DATA	PROCESSING OPERATION
<p>To facilitate event planning and management.</p> <p>To provide marketing materials and information to data subjects on behalf of the Client.</p> <p>To provide payments to fulfil a contractual obligation on behalf of the Client.</p>	<p>Event attendees or prospective attendees.</p> <p>Client customers or prospective customers.</p> <p>Talent and Client brand ambassadors.</p> <p>Individuals participating in promotional activities.</p>	<p>Identifying information: Name, personal contact details (including address, telephone and mobile numbers and email address), place of work, job title, employment contact details (including address, telephone and mobile numbers and email address), age, gender, physical characteristics.</p> <p>Other: Invoicing and billing information and personal preferences.</p> <p>Special categories: only where necessary to provide the services described in the MSA and/ corresponding SOW. (Religion, health data e.g. dietary or accessibility requirements).</p>	<p>Using contact details to provide event information and marketing communications.</p> <p>Using contact and bank details to fulfil a contractual obligation, e.g. making payment to talent or contractors.</p> <p>Using contact and personal details to provide hospitality/travel/accommodation arrangements.</p>
DURATION OF PROCESSING	The Personal Data will be processed by the Agency for the duration of the Agreement, Services or part thereof or in accordance with applicable law.		

8. Experiential (Brand Experiences for Consumers, or Creative PR Stunts)

PURPOSE OF PROCESSING	CATEGORIES OF DATA SUBJECT	CATEGORIES OF PERSONAL DATA	PROCESSING OPERATION
<p>Experiential: brand experiences for consumers or creative PR stunts.</p>	<p>Client customers, potential client customers, talent.</p>	<p>Name, address, email address, phone number – home or mobile, date of birth, IP address, geo-location.</p> <p>Other: Invoicing and billing information.</p> <p>Special categories: only where necessary to provide the services described in the MSA and/ corresponding SOW. (Religion, health data e.g. dietary or accessibility requirements).</p>	<p>Using contact details to provide event information and marketing communications.</p> <p>Using location data to deliver location based messages and information.</p>
<p>DURATION OF PROCESSING</p>	<p>The Personal Data will be processed by the Agency for the duration of the Agreement, Services or part thereof or in accordance with applicable law.</p>		

9. Hospitality Management

PURPOSE OF PROCESSING	CATEGORIES OF DATA SUBJECT	CATEGORIES OF PERSONAL DATA	PROCESSING OPERATION
<p>To provide hospitality events and information to data subjects on behalf of the Client.</p> <p>To provide payments to fulfil a contractual obligation on behalf of the Client.</p>	<p>Consumers/Individuals attending Client events or participating in promotional activities.</p> <p>Client customers or prospective customers.</p> <p>Talent and Client brand ambassadors.</p> <p>Consumers providing customer insight in respect of consumer products.</p>	<p>Identifying information: Name, personal contact details (including address, telephone and mobile numbers and email address), place of work, job title, employment contact details (including address, telephone and mobile numbers and email address), age, gender, physical characteristics.</p> <p>Other: Invoicing and billing information and personal preferences.</p> <p>Special categories: only where necessary to provide the services described in the MSA and/ corresponding SOW. (Religion, health data e.g. dietary or accessibility requirements).</p>	<p>Using contact details to provide communications relating to events or hospitality.</p> <p>Using contact and bank details to fulfil a contractual obligation e.g. providing a service or product to consumers, making payment to talent or contractors.</p> <p>Using contact and personal details to provide hospitality/travel/accommodation arrangements.</p>
<p>DURATION OF PROCESSING</p>	<p>The Personal Data will be processed by the Agency for the duration of the Agreement, Services or part thereof or in accordance with applicable law.</p>		

10. Insights And Activation of Media for Target Audiences			
PURPOSE OF PROCESSING	CATEGORIES OF DATA SUBJECT	CATEGORIES OF PERSONAL DATA	PROCESSING OPERATION
<p>Insights for plan and activation of media for target audiences and measurement of campaign effectiveness.</p> <p>Client to Agency's sub-processor (e.g. LiveRamp) hashing and uniquely identifying</p> <p>Client to Technology Vendors (e.g DSPs) contracted through Agency: adserving, tracking of user engagement with/delivery of online adverts.</p>	<p>Client to Agency's sub-processor: Client customers or potential customers.</p> <p>Consumers who have been served campaign/advert.</p>	<p>Client to Agency's sub-processor: Name, personal contact details (including address, telephone and mobile numbers and email address), location data, gender, age, date of birth, mobile device ID, cookie ID, IP Addresses, preferences.</p> <p>Agency sub-processor to Agency: Mediabrands ID</p> <p>Technology vendors to Agency: IP Addresses, cookies IDs, location data (incl. Latitude & Longitude, postcode, mobile GPS location), mobile device ID, preferences.</p> <p>Special Categories: None.</p>	<p>Client to Agency's sub-processor: Collection, recording, organisation, structuring, storage, use, disclosure, making available, erasure, dissemination. Hashing of data and uniquely identifying.</p> <p>Agency sub-processor to Agency: to match pseudonymised audiences</p> <p>Technology vendors to Agency: Collection, recording, organisation, structuring, storage, use, disclosure, making available, erasure, dissemination.</p>
DURATION OF PROCESSING	<p>Client to Agency: The Personal Data will be processed by the Agency for the duration of the Agreement, Services or part thereof or in accordance with applicable law.</p> <p>Client to Technology Vendors contracted through Agency: determined according to vendor contract and instructions of client.</p>		

11. Lobbying			
PURPOSE OF PROCESSING	CATEGORIES OF DATA SUBJECT	CATEGORIES OF PERSONAL DATA	PROCESSING OPERATION
To engage with officials and public figures to inform and influence on behalf of the Client.	Individuals who influence government decisions or public figures.	<p>Identifying information: Name, personal contact details (including address, telephone and mobile numbers and email address), place of work, job title, employment contact details (including address, telephone and mobile numbers and email address), age, gender, physical characteristics, preferences.</p> <p>Other: Invoicing and billing information and personal preferences.</p> <p>Special categories: only where necessary to provide the services described in the MSA and/ corresponding SOW. (Religion, health data (e.g. dietary requirements).</p>	<p>Using contact details to engage with government officials and public figures.</p> <p>Using place of work, job title and personal preferences to identify areas of public influence or exposure.</p>
DURATION OF PROCESSING	The Personal Data will be processed by the Agency for the duration of the Agreement, Services or part thereof or in accordance with applicable law.		

12. Programmatic Services			
PURPOSE OF PROCESSING	CATEGORIES OF DATA SUBJECT	CATEGORIES OF PERSONAL DATA	PROCESSING OPERATION
<p><i>Client to Agency: Provide precision targeted advertising services to promote engagement with Client brands or purchase of Client products or services.</i></p> <p>Client to Technology Vendors contracted through Agency: Ad-serving, tracking of user engagement with/delivery of online adverts.</p>	<p><i>Client to Agency: (as below, no data is received by Agency from Client. Data transferred directly to technology vendors)</i></p> <p><i>Client to Technology Vendors contracted through Agency: Client customers or prospective customers visiting client websites.</i></p>	<p><i>Client to Agency: N/A (as below, no data is received by Agency from Client. Data transferred directly to technology vendors)</i></p> <p>Client to Technology Vendors contracted through Agency: IP Addresses, cookies IDs, location data (incl. Latitude & Longitude, postcode, mobile GPS location), mobile device ID, preferences.</p> <p>Special categories: None.</p>	<p><i>Client to Agency: N/A (as below, no data is received by Agency from Client. Data transferred directly to technology vendors)</i></p> <p>Client to Technology Vendors contracted through Agency: Collection, logging, organisation, storage, adaptation, analysis, use, disclosure by transmission, alignment & combination, erasure, retrieval and dissemination.</p>
DURATION OF PROCESSING	<i>Client to Technology Vendors contracted through Agency: duration of the Agreement, Services or in accordance with applicable law.</i>		

13. Provision of Services, Including Billing			
PURPOSE OF PROCESSING	CATEGORIES OF DATA SUBJECT	CATEGORIES OF PERSONAL DATA	PROCESSING OPERATION
Provision of services, including billing.	Client customers, talent.	Name, address, email address, phone number – home or mobile, date of birth, bank details. Special categories: None.	Receiving, sorting and using the data for the purpose, deleting in accordance with contractual obligations or deletion policy.
DURATION OF PROCESSING	The Personal Data will be processed by the Agency for the duration of the Agreement, Services or part thereof or in accordance with applicable law.		

14. Public Relations			
PURPOSE OF PROCESSING	CATEGORIES OF DATA SUBJECT	CATEGORIES OF PERSONAL DATA	PROCESSING OPERATION
<p>To engage with journalists and influencers in order to provide public relations services to the Client.</p> <p>To provide payments to fulfil a contractual obligation on behalf of the Client.</p>	Journalists and traditional, members of the public or social media influencers.	<p>Identifying information: Name, personal contact details (including address, telephone and mobile numbers and email address), place of work, job title, employment contact details (including address, telephone and mobile numbers and email address), age, gender, physical characteristics.</p> <p>Other: Invoicing and billing information and personal preferences.</p> <p>Special categories: None.</p>	<p>Using contact details to engage with journalists and influencers.</p> <p>Using place of work, job title and personal preferences to identify areas of public influence or exposure.</p> <p>Using contact and bank details to fulfil a contractual obligation.</p>
DURATION OF PROCESSING	The Personal Data will be processed by the Agency for the duration of the Agreement, Services or part thereof or in accordance with applicable law.		

15. Research & Insights: Qualitative Research			
PURPOSE OF PROCESSING	CATEGORIES OF DATA SUBJECT	CATEGORIES OF PERSONAL DATA	PROCESSING OPERATION
<p>Provide research to provide clients with insight as to how to communicate their products and services in the media.</p> <p>To understand the behaviour of individuals to guide Client's use of media.</p>	Client customers, prospective customers or Individual members of the public as it relates to particular industries.	<p>Name, job title, contact number, employment details, photo, date of birth, preferences.</p> <p>Special categories: None.</p>	Collection, recording, organisation, structuring, storage, use, disclosure, making available, erasure, dissemination.
DURATION OF PROCESSING	The Personal Data will be processed by the Agency for the duration of the Agreement, Services or part thereof or in accordance with applicable law.		

16. Research & Insights: Listening Services			
PURPOSE OF PROCESSING	CATEGORIES OF DATA SUBJECT	CATEGORIES OF PERSONAL DATA	PROCESSING OPERATION
Social media listening services.	<p>Agency via Third Party Vendor: Individual members of the public who share their information online via social media sites.</p> <p>Agency direct: Individual members of the public who share their information online via social media sites.</p>	<p>Name, online identifier; picture; video; email addresses; phone number.</p> <p>Name, online identifier; picture; video; email addresses; phone number.</p> <p>Special Categories: None.</p>	<p>Collection, recording, organisation, structuring, storage, use, disclosure, making available, erasure, dissemination.</p> <p>Collection, recording, organisation, structuring, storage, use, disclosure, making available, erasure, dissemination.</p>
DURATION OF PROCESSING	The Personal Data will be processed by the Agency for the duration of the Agreement, Services or part thereof or in accordance with applicable law.		

17. Sales Promotion Administration			
PURPOSE OF PROCESSING	CATEGORIES OF DATA SUBJECT	CATEGORIES OF PERSONAL DATA	PROCESSING OPERATION
Administering a sales promotion.	Client customers, potential client customers.	<p>Name, address, email address, phone number – home or mobile, bank details.</p> <p>Special categories: None.</p>	<p>Using contact details to provide marketing communications.</p> <p>Using contact and bank details to fulfil a contractual obligation e.g. providing a service or product to consumers.</p> <p>Using contact and personal details to provide goods or services as per the promotion.</p>
DURATION OF PROCESSING	The Personal Data will be processed by the Agency for the duration of the Agreement, Services or part thereof or in accordance with applicable law.		

18. Search: Targeted Advertising			
PURPOSE OF PROCESSING	CATEGORIES OF DATA SUBJECT	CATEGORIES OF PERSONAL DATA	PROCESSING OPERATION
Targeted advertising and lead generation.	Client to Technology Vendors contracted through Agency: Client customers or prospective customers visiting client websites.	Client to Technology Vendors contracted through Agency: IP Addresses, cookies IDs, location data (incl. Latitude & Longitude, postcode, mobile GPS location), mobile device ID. <i>Special Categories:</i> None.	Client to Technology Vendors contracted through Agency: Collection, logging, organisation, storage, adaptation, analysis, use, disclosure by transmission, alignment & combination, erasure, retrieval and dissemination.
DURATION OF PROCESSING	Client to Technology Vendors contracted through Agency: duration of the Agreement, Services or in accordance with applicable law.		

19. Search: Digital Marketing			
PURPOSE OF PROCESSING	CATEGORIES OF DATA SUBJECT	CATEGORIES OF PERSONAL DATA	PROCESSING OPERATION
Automated digital marketing.	Client to Agency: Visitors of client website; visitors to client marketing events. Client to Technology Vendors contracted through Agency: Visitors of client website; visitors to client marketing events.	Client to Agency: Name, address, contact number, date of birth, job title, employer details, business contact details. Client to Technology Vendors contracted through Agency: Name, address, contact number, date of birth, job title, employer details, business contact details.	Client to Agency: Logging, organisation, storage, adaptation, profiling, analysis, use, alignment & combination, erasure, retrieval and dissemination. Client to Technology Vendors contracted through Agency: Logging, organisation, storage, adaptation, profiling, analysis, use, alignment & combination, erasure, retrieval and dissemination.
DURATION OF PROCESSING	Client to Agency: deletion as soon as passed to Technology Vendor. Client to Technology Vendors contracted through Agency: duration of the Agreement, Services or in accordance with applicable law.		

20. Social Media Management and Maintenance

PURPOSE OF PROCESSING	CATEGORIES OF DATA SUBJECT	CATEGORIES OF PERSONAL DATA	PROCESSING OPERATION
<p>To provide social media management services and information to data subjects on behalf of the Client.</p> <p>To provide payments to fulfil a contractual obligation on behalf of the Client.</p>	<p>Client customers or prospective customers; talent and Client brand ambassadors; and consumers providing customer insight in respect of consumer platforms or products.</p>	<p>Identifying information: Name, social media account name, personal contact details (including address, telephone and mobile numbers and email address), IP Addresses and mobile device identifiers, place of work, job title, employment contact details (including address, telephone and mobile numbers and email address), age, gender, physical characteristics.</p> <p>Other: Invoicing and billing information and personal preferences.</p> <p>Special categories: only where necessary to provide the services described in the MSA and/ corresponding SOW.</p>	<p>Using contact details to provide marketing communications, and to manage social media.</p> <p>Using contact and bank details to fulfil a contractual obligation e.g. providing a service or product to consumers, making payment to talent or contractors.</p>
<p>DURATION OF PROCESSING</p>	<p>The Personal Data will be processed by the Agency for the duration of the Agreement, Services or part thereof or in accordance with applicable law.</p>		

21. Social Media Services

PURPOSE OF PROCESSING	CATEGORIES OF DATA SUBJECT	CATEGORIES OF PERSONAL DATA	PROCESSING OPERATION
To target advertising through social media advertising platform and/or generate leads.	Client to Technology Vendors contracted through Agency: Client customers or prospective customers visiting client websites, or social media users.	Client to Technology Vendors contracted through Agency: IP Addresses, cookies IDs, location data (incl. Latitude & Longitude, postcode, mobile GPS location), mobile device ID. <i>Special Categories:</i> None.	Client to Technology Vendors contracted through Agency: Collection, logging, organisation, storage, adaptation, profiling, analysis, use, disclosure by transmission, alignment & combination, erasure, retrieval and dissemination.
DURATION OF PROCESSING	Client to Technology Vendors contracted through Agency: duration of the Agreement, Services or in accordance with applicable law.		

22. Talent Management

PURPOSE OF PROCESSING	CATEGORIES OF DATA SUBJECT	CATEGORIES OF PERSONAL DATA	PROCESSING OPERATION
<p>To facilitate talent and Client brand ambassador participation in Client project.</p> <p>To provide payments to fulfil a contractual obligation on behalf of the Client.</p>	<p>Talent and Client brand ambassadors.</p> <p>Agents, representatives and employees of talent and Client brand ambassadors.</p>	<p>Identifying information: Name, personal contact details (including address, telephone and mobile numbers and email address), place of work, job title, employment contact details (including address, telephone and mobile numbers and email address), age, gender, physical characteristics.</p> <p>Other: Invoicing and billing information and personal preferences.</p> <p>Special categories: only where necessary to provide the services described in the MSA and/ corresponding SOW. (Religion, health data e.g. dietary or accessibility requirements).</p>	<p>Using contact details to facilitate talent and Client brand ambassador participation in Client project.</p> <p>Using contact and bank details to fulfil a contractual obligation e.g. making payment to talent or contractors.</p> <p>Using contact and personal details to provide hospitality/travel/accommodation arrangements.</p>
<p>DURATION OF PROCESSING</p>	<p>The Personal Data will be processed by the Agency for the duration of the Agreement, Services or part thereof or in accordance with applicable law.</p>		

23. Technology Development (Apps, Websites, Social Media)

PURPOSE OF PROCESSING	CATEGORIES OF DATA SUBJECT	CATEGORIES OF PERSONAL DATA	PROCESSING OPERATION
<p>To provide app/website/social media development services and information to data subjects on behalf of the Client.</p> <p>To provide payments to fulfil a contractual obligation on behalf of the Client.</p>	<p>Client customers or prospective customers; talent and Client brand ambassadors.</p> <p>Consumers providing customer insight in respect of consumer products or services.</p>	<p>Identifying information: Name, personal contact details (including address, telephone and mobile numbers and email address), place of work, job title, employment contact details (including address, telephone and mobile numbers and email address), age, gender, physical characteristics, geolocation.</p> <p>Other: Invoicing and billing information and personal preferences.</p> <p>Special categories: None.</p>	<p>Using personal data to develop app/website functionality and content.</p> <p>Using personal data to deliver apps; allow access to websites and social media services.</p> <p>Collecting data to provide insight into app/website/social media usage.</p> <p>Using personal data to improve app/website/social media features and functionality.</p> <p>Profiling users to target features and functionality.</p> <p>Using contact and bank details to fulfil a contractual obligation e.g. providing a service or product to consumers, making payment to talent or contractors.</p>
<p>DURATION OF PROCESSING</p>	<p>The Personal Data will be processed by the Agency for the duration of the Agreement, Services or part thereof or in accordance with applicable law.</p>		

II. Specialist Services – Pharmaceutical and Medical

24. External Expert Engagement			
PURPOSE OF PROCESSING	CATEGORIES OF DATA SUBJECT	CATEGORIES OF PERSONAL DATA	PROCESSING OPERATION
<p>To make an assessment about the person's expertise/influence ranking based on objective parameters (number of publications, editorial board membership, etc.)</p> <p>To understand views on therapy areas and medicines.</p> <p>To enable interactions on content development.</p> <p>To fulfil a contractual obligation, e.g. payment for fees/expenses.</p>	<p>Health care professionals and health care providers.</p>	<p>Name, job title, contact details including work address, email, telephone and mobile numbers.</p> <p>Age, gender, personal preferences and opinions, authorship of publications, membership of professional societies, nationality, qualifications, conflict of interest disclosures. Voice recording.</p> <p>Bank details.</p>	<p>Use contact details to help with developing and editing scientific content and understand views on therapy areas and medicines.</p> <p>Use bank details to fulfil a contractual obligations, e.g. payment for fees/expenses.</p>
DURATION OF PROCESSING	<p>The Personal Data will be processed by the Agency for the duration of the Agreement, Services or part thereof or in accordance with applicable law.</p>		

25. Market Research (Interviews/Insight/Consultancy)

PURPOSE OF PROCESSING	CATEGORIES OF DATA SUBJECT	CATEGORIES OF PERSONAL DATA	PROCESSING OPERATION
<p>To provide business insights for clients (Data Controller).</p>	<p>Study participants (health care professionals, health care providers, health care payers and regulators, patients/carers and consumers). Agency customers / prospective customers. Sub-contractors / prospective suppliers.</p>	<p>Name, job title, contact details including work address, email, telephone and mobile numbers.</p> <p>Age/years of service, gender, employment status, personal preferences and opinions, nationality, professional qualifications/grade, specialty, conflict of interest disclosures. Voice recording.</p> <p>Bank details.</p> <p>Substantive information about own health and interactions with health practitioners. Impact of health issues on lifestyle (work, family).</p>	<p>Using contact details to provide marketing communications and develop business relationships.</p> <p>Using bank details to make payment to contractors and market research participants.</p> <p>Analysis to understand views on therapy areas, medical interventions (including pharmaceuticals) and medical (support) services. Products tested may have received marketing authorization or be in clinical development.</p> <p>To optimize brand development strategy and tools.</p> <p>Quality control and Pharmacovigilance.</p>
<p>DURATION OF PROCESSING</p>	<p>The Personal Data will be processed by the Agency for the duration of the Agreement, Services or part thereof or in accordance with applicable law.</p>		

26. Meetings and Events			
PURPOSE OF PROCESSING	CATEGORIES OF DATA SUBJECT	CATEGORIES OF PERSONAL DATA	PROCESSING OPERATION
<p>To enable interactions on content development.</p> <p>To provide hospitality/travel/accommodation arrangements and visa applications.</p> <p>To fulfil a contractual obligations, e.g. payment for fees/expenses or to liaise with a congress on behalf of a HCP or healthcare provider.</p>	<p>Health care professionals and health care providers.</p> <p>Occasionally patients or patient representatives and/or carers.</p>	<p>Name, job title, contact details including address (work and home), email (work and personal), telephone numbers (work and personal), age, gender, personal preferences, nationality, qualifications, partner/dependant emergency contact details, conflict of interest disclosures.</p> <p>Log in details for congresses, society membership details.</p> <p>Bank details.</p> <p>Passport number, driver's license or social security number.</p>	<p>Use contact details to help with developing and editing scientific content.</p> <p>Use contact details and identity information to arrange hospitality/travel/accommodation arrangements and visa applications.</p> <p>Disclose conflict of interest data as part of the presentation submission.</p> <p>Use log-in details society membership information to upload presentations to congress websites and portals.</p> <p>Use bank details to pay fees and expenses.</p>
DURATION OF PROCESSING	<p>The Personal Data will be processed by the Agency for the duration of the Agreement, Services or part thereof or in accordance with applicable law.</p>		

27. Publications (Medical Context)			
PURPOSE OF PROCESSING	CATEGORIES OF DATA SUBJECT	CATEGORIES OF PERSONAL DATA	PROCESSING OPERATION
<p>To enable interactions on scientific content development.</p> <p>To enable agency to upload content to meeting/journal content portals websites.</p> <p>To fulfil a contractual obligation on behalf of the Data Controller regarding scientific content.</p>	<p>Health care professionals and health care providers.</p> <p>Patients (rarely).</p>	<p>Name, job title, contact details including work address email telephone and mobile number, nationality, qualifications, conflict of interest disclosures.</p> <p>Log-in details for meeting abstract, presentation or journal publication upload, society membership information.</p>	<p>Use contact details to help with developing and editing scientific content.</p> <p>Disclose conflict of interest data as part of the publication submission.</p> <p>Use log in details and society membership information to upload content to meeting/journal content portals and websites.</p>
DURATION OF PROCESSING	The Personal Data will be processed by the Agency for the duration of the Agreement, Services or part thereof or in accordance with applicable law.		

28. Technology Development (Apps, Websites, Social Media) (Medical Context)

PURPOSE OF PROCESSING	CATEGORIES OF DATA SUBJECT	CATEGORIES OF PERSONAL DATA	PROCESSING OPERATION
<p>To provide app/website/social media development services and information to data subjects on behalf of the Client.</p>	<p>Healthcare professionals.</p>	<p>Name, email, place of work, job title, geolocation.</p>	<p>Using personal data to deliver app/website functionality and content.</p> <p>Using personal data to deliver apps; allow access to websites and social media services.</p> <p>Collecting data to provide insight into app/website/social media usage.</p> <p>Using personal data to improve app/website/social media features and functionality.</p> <p>Profiling users to target features and functionality.</p>
<p>DURATION OF PROCESSING</p>	<p>The Personal Data will be processed by the Agency for the duration of the Agreement, Services or part thereof or in accordance with applicable law.</p>		