

dentsu AEGIS network

# **GENERAL DATA PROTECTION REGULATION (GDPR) CLIENT INFORMATION**

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**The continued growth of the digital economy means there is now more data than ever before about people's preferences, interests, behaviour, location and movements.**

**At Dentsu Aegis Network, we specialize in leveraging data and audience insights to deliver a competitive advantage to our clients. To offer our transformational services, we invest in data and analytics innovation, data platforms and technological capability. We recognise that the compliant use of data is core to the success of our clients' business objectives, and for that reason we prioritise data protection and privacy across our business.**

**Engaging with national data protection regulators and a variety of industry bodies including the International Association of Privacy Professionals, we aim to be industry leaders for data protection.**

**Our Global Data Protection Officer works with colleagues across Legal, Technology and the business to ensure that our privacy and data protection obligations are understood and upheld by everyone who works for us.**

The purpose of this document is to provide our clients with an overview of our approach to the General Data Protection Regulation (GDPR).

**Q: What is the GDPR?**

**A:** The GDPR came into force on 25 May 2018 and signified the biggest revision of privacy laws in over a decade.

The aim of the GDPR is to harmonise privacy law across all EU member states and to help promote the digital economy. It also introduced new legal rights for individuals to better control and protect their personal data.

**Q: Who does the GDPR apply to?**

**A:** The GDPR applies to organisations based within the EU. It also applies to organisations operating outside of the EU, if that organisation offers goods/ services to, or monitors the behaviour of people in the EU.

For example, the GDPR could apply to a US-based client whose website uses tracking technology to collect personal data to create profiles of EU residents.

### Q: What is Dentsu Aegis Network's approach to GDPR?

**A:** Our global privacy and data protection framework is built upon best-practice and the key principles of the GDPR. We expect everyone at all levels of our organisation to comply with this. We work with our clients to ensure they understand and are comfortable with how their data is being used and only use client data in accordance with our client's instructions.

Our employees receive mandatory data protection and security training which is supplemented by online resources and face-to-face training for high risk groups. We respect the need for *Privacy by Design* and to ensure that our products and services are compliant. As part of our governance framework our Global Data Protection Officer monitors data compliance and provides regular updates to our CEO and Executive Team. Our Data Protection Officers Network helps to ensure that our privacy and data protection framework operates as intended at the local level, and our Internal Audit team regularly reviews aspects of data protection and security across our business.

We will continue to refine our privacy and data protection framework based on new guidance from national data protection regulators and emergence of case law.

### Q: How does Dentsu Aegis Network securely manage data?

**A:** Data, technology systems and client trust are pivotal to the success of our business.

As the sophistication of cyber threats increase, safeguarding these assets and our client data is a top priority for us. Under our Chief Information Security Officer, we operate a group wide security function tasked with understanding security threats and delivering a multi-layered control environment to protect against them.

Our policies are aligned to applicable regulations and industry standards, including, ISO27001 and NIST, and are applicable to all parts of Dentsu Aegis Network. Finally, we believe security is everybody's responsibility and invest significantly in user awareness and education programs to embed this.

**Q: What effect does the GDPR have on Dentsu Aegis Network's use of personal data?**

**A:** The GDPR places a greater focus on business accountability and transparency around how personal data is used. It does not however, prohibit the use of personal data in advertising.

Through the new requirement of privacy by design, the new standard for consent and greater rights for individuals, we see the GDPR as an opportunity for brands to increase consumer trust and confidence in the digital economy and the new and maturing technologies that enable it.

**Q: Whats the new standard for consent?**

**A:** Under the GDPR, there is a stronger focus on obtaining explicit consumer consent for the usage of their data in a both transparent and unambiguous manner; not for example by hiding such consent deep within terms and conditions that sit behind pre-ticked boxes.

This requirement has led to a change in practice for some businesses that previously relied on "deemed" or assumed consent. It is worth remembering that consent is not the only way of lawfully collecting consumer data.

Legitimate interests may prove a useful alternative to consent. We work closely with our clients and suppliers to ensure that the necessary protections for consumers are in place as part of our overall GDPR compliance framework.

**Q: Does "Brexit" mean the GDPR won't apply to the UK?**

**A:** The GDPR will continue to apply directly to the UK for as long as the UK remains a member of the EU (and in the event a transition period is agreed as part of Brexit negotiation). The government is committed to ensuring that the UK data protection framework continues to function in line with GDPR and the provisions of the GDPR will be retained under English law (albeit with minor edits to reflect the UK's new position outside of the EU).