

**dentsu AEGIS**  
network

# **EMPLOYEE, JOB CANDIDATES AND JOB LEAVERS PRIVACY NOTICE**

**Last updated: 04/2019**

**Innovating the ways brands are built**

## WELCOME

This Privacy Notice ('**Notice**') applies to the personal information we collect about Our People worldwide in recruitment, during employment and after they leave us. It explains how Dentsu Aegis Network ('**DAN**', '**we**') uses your personal information - what information we collect about you (including from third parties), why we collect it, what we do with it and on what basis and how we protect it.

Where we refer to certain legal words or phrases, they're displayed in a **different colour**. You can find further detail of what these mean at the end of this Notice.

We regularly review this Notice and will take reasonable steps to inform you of any changes that we may make. Please read it carefully.

**Please note, there may be additional guidance issued in your country of employment. That guidance will take precedence over this Notice.**

# 1

## WHO DOES THIS NOTICE AFFECT?

The Notice covers Our People and includes 'you', prospective, present and past employees, contractors, agency staff and people connected to you (such as the person you nominate to contact in an emergency).

DAN and its group of organisations use global HR information systems ('**HRIS**') for employment management and recruitment purposes to capture and store personal data of Our People.

# 2

## WHO COLLECTS YOUR DATA?

Your **personal data** is collected by the **DAN organisation** that you entered into an employment contract or relationship or a contract for services with, have applied for a role with, or used to work for. This DAN organisation is a **data controller** in relation to the personal data that is collected about you. Your personal data may need to be **processed** by **other DAN organisations** for their own independent purposes. In which case, these organisations are also data controllers of your personal data.

If you have questions about which DAN organisation is a data controller in respect of your personal data, please contact your local HR team or, where applicable, your data protection officer.

# 3

## WHAT IS NOT INCLUDED?

The Notice is intended to tell you how we use personal information but is not intended to create a contract with you.

This Notice does not apply to the information we hold about companies or other organisations, or to other companies or organisations collecting and using your personal information. You should review their privacy policies before giving them your personal information.

# 4

## HOW DO WE COLLECT YOUR PERSONAL DATA?

We collect the majority of your personal information directly from you, but in some cases we will collect it from third parties.

### **When you provide personal data about yourself and others**

This is personal data that you provide to the local HR Recruitment team or enter directly into our HRIS. You may also provide us with personal data about others e.g. your dependents. We use this information for HR administration and management reasons. Examples include the administration of employment benefits or contacting your next-of-kin in the event of emergency.

To comply with our legal obligations, or where we need this information to fulfil our obligations to you under an employment contract or contract for services, certain data fields in our HRIS are mandatory. Where HRIS fields are voluntary it is your choice if you wish to provide the information requested.

### **We may collect personal data from other organisations**

We may obtain information about you from other organisations. For example, references from your previous employer(s) and background checks where permitted by applicable law.

We sometimes advertise through recruitment agencies or use the services of specialist search organisations. These companies will collect your application information. You may also be asked to complete a work preference questionnaire which is used to assess your suitability for the role you have applied for, the results of which are assessed by our recruiters.

If you are applying to work with us through an agency, please review their privacy notice for details of how they will handle your information.

# 5

## WHAT KINDS OF PERSONAL DATA DO WE COLLECT AND HOW DO WE USE IT?

The personal data we collect about you depends on your circumstances, your role, the law and whether you are a prospective, current or past employee. Below you can find information about the purposes and types of personal information we process for job candidates, employees and job leavers.

### JOB CANDIDATES: APPLYING TO JOIN DAN

PURPOSE OF PROCESSING YOUR PERSONAL INFORMATION	PURPOSE IN DETAIL	GROUNDS FOR PROCESSING
<p><b>RECRUITMENT – APPLICATION STAGE</b></p>	<p>We will use your personal information to assess whether you are suitable for a role with us and put in place arrangements for any interviews and assessments. This applies whether you have made an application directly to us, through an agency or a third party.</p> <p>This will also include contacting you to arrange, conduct, evaluate and feedback on assessments and interviews, and where successful to make you an offer/provide you with a contract of employment.</p> <p>For this purpose, we will collect your contact details and other information to confirm your identity. This includes your name, gender, address, phone number, date of birth, and email address, national insurance number. We will also collect information about your employment history and skills. This includes your CV, resumes, application forms, references, records of qualifications, skills, training and other compliance requirements. This may also include records of when you contact us, emails, webchats and phone conversations.</p>	<p><b>Legitimate Interest</b></p>
<p><b>RECRUITMENT – SHORT LISTING</b></p>	<p>Our hiring managers will shortlist applications for interview based upon the details uploaded by you to our online application system.</p>	<p><b>Legitimate Interest</b></p>
<p><b>RECRUITMENT - ASSESSMENTS</b></p>	<p>This involves the assessment of your suitability to do the job you have applied for.</p> <p>We might ask you to participate in assessment days; complete tests or occupational personality profile questionnaires; and/or to attend a series of interview's – or a combination of these. Information will be generated by you and by us. For example, you may complete a written test or we may take interview notes.</p>	<p><b>Legitimate Interest</b></p>

## JOB CANDIDATES: APPLYING TO JOIN DAN

PURPOSE OF PROCESSING YOUR PERSONAL INFORMATION	PURPOSE IN DETAIL	GROUNDS FOR PROCESSING
<b>PRE-EMPLOYMENT CHECKS</b>	Carry out pre-employment checks (where permitted by law), including your legal right to work, professional qualifications, criminal record and follow up references provided to us.	<b>Legal Obligation/ Legitimate interest</b>
<b>PRECISION JOB MATCHING</b>	Understand if you have any prior employment history with us and the reasons why you left, check whether you have applied to us before, understand why you have declined a job offer from us if you did so, and see if you would be interested in other roles with us (you can always ask us not to contact you and we will respect your decision).	<b>Legitimate interest</b>
<b>REASONABLE ADJUSTMENTS</b>	<p>Make reasonable adjustments to the recruitment process based on the accessibility requirements you make us aware of or we become aware of.</p> <p>For this purpose we may, subject to the circumstances, collect information about you to help us assess adjustments which need to be made or work restrictions which may apply. This may include your nationality, preferred language, and details of any accessibility requirements.</p>	<b>Legal Obligation/ Legitimate interest</b>
<b>EQUAL OPPORTUNITIES MONITORING</b>	In some countries we may, subject to local laws, ask you to register with us your personal profile. This could include declaring information about your ethnicity, disability, age, religion/belief, gender and sexual orientation. This information is used to comply with equality and diversity requirements and to help us improve our employment practices. Access to this information is strictly limited.	<b>Legal Obligations/ Legitimate Interest in countries where not legally required</b>
<b>TALENT POOL</b>	If you are unsuccessful following assessment for the position you have applied for, we will retain your details in our talent pool for a period of 6 months so that we can contact you should any further suitable vacancies arise. If you would like us to delete this data, please contact us at <a href="mailto:HR@dentsuaegis.com">HR@dentsuaegis.com</a>	<b>Legitimate Interest</b>

Additional information about the ways in which DAN processes your personal data may be notified to you locally. Unless otherwise stated above we use this information as it is in our legitimate interests as a recruiter to fully understand and assess an applicant's suitability for a role and verify the information provided to us.

## EMPLOYEES: WORKING FOR DAN

We will use your personal information for the purposes of your **employment contract** with us, to **comply with legal obligations**, or where **we have a legitimate interest** in doing so to manage and protect our business. We will rely on legitimate interest pursued by DAN where it is not overridden by the interests or fundamental rights and freedoms of Our People. This means we will:

PURPOSE OF PROCESSING YOUR PERSONAL INFORMATION	PURPOSE IN DETAIL	GROUNDS FOR PROCESSING
<p><b>CARRY OUT OUR ROLE AS YOUR EMPLOYER</b></p>	<p>This involves allocating and managing your duties and responsibilities and the business activities to which they relate, enabling communication between staff, assessing your performance, helping change your work pattern when appropriate, arranging business travel, providing you with HR support and case management, and developing your skills (such as training and certifications), as well as assisting you in your career and succession planning.</p> <p>For this purpose, we would process information about your work contract, attendance and performance such as your start date, place(s) of work, performance reviews, development notes and plans, records of your training, HR records such as leave, sickness, grievances and other compliance requirements.</p>	<p><b>Contract</b></p>
<p><b>REMUNERATION &amp; BENEFITS ADMINISTRATION</b></p>	<p>This involves providing and administering remuneration, pension and life cover benefits, and incentive schemes as well as making appropriate tax and social security deductions and contributions, as well as managing expenses.</p> <p>We will offer you the chance to choose benefits, where you are eligible. This may involve us passing appropriate personal information on to the relevant third party benefit provider so they can contact you, or you may register with them direct. We will also provide the details of any beneficiaries you nominate in case of death or other benefits to the relevant third party.</p>	<p><b>Contract/ Legal Obligation</b></p>
<p><b>REVIEWS &amp; COMPLAINTS HANDLING</b></p>	<p>This involves managing and operating conduct, performance, capability, absence and grievance related reviews, allegations, complaints, investigations and processes and other informal and formal HR processes e.g. internal job applications, making related management decisions and anything else required under our contract with you.</p>	<p><b>Contract</b></p>
<p><b>HR ADMINISTRATION &amp; MANAGEMENT</b></p>	<p>This includes maintaining and processing general records necessary for the management of staff and to operate the contract of employment or contract for services between you and the DAN organisation.</p>	<p><b>Contract</b></p>

PURPOSE OF PROCESSING YOUR PERSONAL INFORMATION	PURPOSE IN DETAIL	GROUNDS FOR PROCESSING
<b>CONSULTATION WITH WORKFORCE REPRESENTATIVES</b>	This involves consultations or negotiations with representatives of the workforce, for example the relevant works council in your country location.	<b>Legal Obligation</b>
<b>HEALTH &amp; SAFETY SUPPORT AT WORK</b>	<p>Processing information about absence or (where required or permitted by applicable law) medical information regarding physical or mental health or condition in order to: assess eligibility for incapacity or permanent disability related remuneration or benefits; determine fitness for work; facilitate a return to work; make adjustments or accommodations to duties or the workplace; and make management decisions regarding employment or engagement, or continued employment or engagement, or redeployment, and conduct-related processes.</p> <p>This includes providing support in work related injuries, illness, management of your health and safety, providing any accessibility support you may need (including where you make us aware in your health declaration upon joining us and as updated by you when appropriate) and contacting your emergency contact if ever needed. This may include us making a referral to the occupational health service and assisting you with ill health retirement applications.</p>	<b>Legal Obligation</b>
<b>REFERENCE REQUESTS</b>	Responding to reference requests from potential employers where DAN is named as a referee	<b>Legitimate Interest</b>
<b>EQUAL OPPORTUNITIES MONITORING</b>	In some countries we may, subject to local laws, process information about your ethnicity, disability, age, religion/belief, gender and sexual orientation. This information is used to comply with equality and diversity requirements as an employer and to help us improve our employment practices. Access to this information is strictly limited.	<b>Legal Obligations/ Legitimate Interest in countries where not legally required</b>
<b>COMPLIANCE MONITORING</b>	<p>Monitor and document activity as required to demonstrate legal compliance. This includes conflict of interest records, gifts and hospitality and anti-bribery and corruption reporting and mandatory compliance training.</p> <p>Complying with applicable laws and regulation for example maternity or parental leave legislation, working time and health and safety legislation, taxation rules, worker consultation requirements, other employment laws and regulations to which DAN is subject.</p>	<b>Legal Obligation/ Legitimate Interest</b>
<b>LAWFUL REQUESTS BY PUBLIC AUTHORITIES</b>	To comply with lawful requests by public authorities (including without limitation to meet national security or law enforcement requirements), discovery requests, or where otherwise required or permitted by applicable laws, court orders, government regulations, or regulatory authorities (including without limitation data protection, tax and employment), whether within or outside your country.	<b>Legal Obligation</b>



PURPOSE OF PROCESSING YOUR PERSONAL INFORMATION	PURPOSE IN DETAIL	GROUNDS FOR PROCESSING
<b>EMPLOYMENT MANAGEMENT IN CASE OF MERGERS OR ACQUISITIONS</b>	Planning, due diligence and implementation in relation to a commercial transaction or service transfer that impacts your relationship with DAN. For example, mergers and acquisitions or a transfer of your employment under automatic transfer rules.	<b>Legitimate interest</b>
<b>MANAGING RELATIONSHIPS WITH CUSTOMERS AND SUPPLIERS</b>	Disclosure of personal data to suppliers may be necessary to enable fulfilment of goods and services to DAN and/or our clients.	<b>Legitimate interest</b>
<b>CASE MANAGEMENT</b>	Handle requests that you may make to us. It could be to help you participate in activities and programmes as an eligible employee.	<b>Legitimate interest</b>
<b>CELEBRATION OF SPECIAL OCCASIONS</b>	Contact you on special occasions such as your birthday and to recognise 'length of service' milestones working for us (but you can always ask us not to).	<b>Legitimate interest</b>
<b>MANAGE OUR FINANCES</b>	This includes managing forecasting, budget and account management and planning for the future.	<b>Legitimate Interest</b>
<b>PREVENTING &amp; DETECTING CRIME</b>	Information required to prevent and detect unlawful activity including IT and building access rights and security monitoring, use of CCTV, fraud detection and prevention measures.	<b>Legal obligation/ Legitimate Interest</b>
<b>BUSINESS REPORTING &amp; ANALYTICS</b>	Gathering information for business operational and reporting documentation, such as the preparation of annual reports including the use of photographic images, and staff engagement or benchmark questionnaires. Your data, if used, will normally be anonymised so that you would not be personally identified.	<b>Legitimate interest</b>
<b>LEGAL CLAIM MANAGEMENT</b>	Respond to and manage our case in a legal claim made by or against us. Such processing is subject to strict confidentiality provisions. This could include an accident at work.	<b>Legitimate Interest</b>

Please note, however, that this is not an exhaustive list of the purposes for which we process personal data.

## LEAVERS: AFTER YOU LEAVE DAN

After you end your employment with us we may need to retain your personal information to fulfil certain business obligations for the following purposes:

PURPOSE OF PROCESSING YOUR PERSONAL INFORMATION	PURPOSE IN DETAIL	GROUNDS FOR PROCESSING
<b>CLAIMS &amp; DISPUTES</b>	To deal with claims or disputes involving you or others. This could include an accident at work. We do this because we have a legal obligation to provide the information, or it is in our interests to bring or defend a claim.	<b>Legal Obligation/ Legitimate interest</b>
<b>BUSINESS CONTINUITY</b>	To understand and evidence decision making in your role and maintain knowledge within the business after you leave. We do this because it is in our interests to use this information to help run our business, or it may be to support a legal obligation we have.	<b>Legal Obligation/ Legitimate Interest</b>
<b>EMPLOYEE RETENTION</b>	To understand why you left us. We do this because it is in our interests to use this information to help run our business, or it may be to support a legal obligation we have.	<b>Legal Obligation/ Legitimate Interest</b>
<b>PENSION ADMINISTRATION</b>	To manage and administer your pension and related legal obligations.	<b>Legal Obligation</b>
<b>OBLIGATIONS TO THIRD PARTIES</b>	To comply with our obligations to third parties in connection with your employment, such as tax authorities and professional bodies.	<b>Legal Obligation/ Contract</b>
<b>EQUAL OPPORTUNITIES MONITORING</b>	Where required or permitted by applicable law, running monitoring programmes to ensure equality of opportunity and diversity with regard to personal characteristics protected under local anti-discrimination laws.	<b>Legal Obligations/ Legitimate Interest in countries where not legally required</b>

## 6

## MONITORING OF WORK COMMUNICATIONS

In accordance with relevant laws, we reserve the right to monitor and scan electronic communications sent using the accounts, network and equipment we provide to you for work purposes. This is to ensure that DAN IT resources are being used in compliance with the law and in accordance with DAN policies. You can find more information about using DAN IT resources in our Acceptable Use Policy on Neon.

We may need to access these communications for a range of reasons. These include complying with legal obligations placed on us to disclose information, to prevent or detect crime, or where we have a legitimate interest in doing so to promote and protect our business.

# 7

## SHARING YOUR INFORMATION

### ACROSS DAN:

DAN is a global organisation. To ensure effective and efficient services and communication throughout the group, your personal data may be shared with other DAN organisations, for example with our group companies in Japan and the USA.

The following people and teams within DAN may be granted on a need-to-know basis access to your personal data:

- local, regional and global HR managers and HR team members;
- local, regional and executive management responsible for managing or making decisions in connection with your relationship with DAN, or when involved in an HR process concerning your relationship with DAN; system administrators; and
- where necessary for the performance of specific tasks or system maintenance, teams such as the Finance and IT Department and the Global HRIS support team.

Basic personal data, such as your name, location, job title, contact information, any published skills and experience profile, as well as any photo that you upload to the HRIS, may be accessible to other employees to facilitate standard business operations.

### OUTSIDE DAN

Your personal data may be also shared with organisations outside of DAN. To help you understand who these organisations are, here is a non-exhaustive list:

- **Third-party suppliers:** Organisations (and their sub-contractors) that provide us with technology solutions and/or support such as the organisations that have been engaged to host, support and otherwise maintain the HRIS. This could also include organisations that provide systems which interconnect with the HRIS. Examples include expenses management software, local payroll and benefits systems. Where we use a third-party service provider we'll make sure we follow the requirements of the law and that your personal information is protected by the appropriate technical and organisational measures.
- **DAN's professional advisers:** IT administrators, auditors, consultants, payroll providers, administrators of DAN's benefits programmes.
- **Insurance providers:** We may also need to share your information with insurance providers in relation to our insurance policies.
- **Clients:** We share your information with our clients where necessary to manage and deliver services to them.
- **Public authorities:** We may will share your information with public authorities to comply with lawful requests (including without limitation to meet national security or law enforcement requirements) or where otherwise required, whether within or outside your country. We only share your personal information in accordance with applicable laws and have strong internal oversight of what we do and take expert advice to inform our approach.



## PROTECTING YOUR INFORMATION AND HOW LONG WE KEEP IT FOR

### **HOW DO WE PROTECT YOUR PERSONAL INFORMATION?**

We have implemented appropriate technical and organisational measures to protect your personal information. These include but are not limited to, physical building controls, device and file encryption and ID verification. Where we transfer your personal information to third-party provider we only do so where we have the appropriate safeguards in place to protect your personal data.

### **HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?**

We keep your personal data for as long as it is required in accordance with the purpose(s) for which it was collected. This will usually be the period of your employment or contract with the DAN organisation plus the length of any applicable statutory limitation period once that employment or contract period has ended. For example, data such as tax and pensions information, may need to be kept for longer. Otherwise we will delete or anonymise it so that you cannot be identified and it can no longer be associated with you.

# 9

## YOUR RIGHTS

Depending on your country of residence you may have a number of rights in respect of your personal data. Please consult your local data protection authority to find out what rights apply to you. We've detailed some examples below.

### **ACCESSING YOUR PERSONAL DATA**

You may have the right to request a copy of the personal data that DAN holds about you. If you are a current employee, you can access a copy of your personal data via our HRIS and other intranet-based tools.

### **KEEPING YOUR PERSONAL DATA CORRECT AND UP-TO-DATE**

You have a right to request that any inaccuracies in your personal data are corrected. It is important that the personal information we hold about you is kept accurate and up to date. If you are a current employee, you can update your HR records directly via our HRIS and other intranet-based tools.

### **ERASURE AND RESTRICTING USE OF PERSONAL DATA**

You have the right to request that we erase your personal data where:

- you believe the personal data is no longer necessary for the purposes it was originally collected;
- where you have been asked to provide consent to our processing of your personal data, you may withdraw your consent at any time by contacting your local HR Team. You should note that the withdrawal of consent may prevent us from carrying out certain tasks within the recruitment process.
- we are relying on the legal basis of legitimate interests to process your personal data (unless we can demonstrate compelling legitimate grounds for our processing of your personal data and those grounds override your interests); or
- your personal data has been unlawfully processed, or must be erased for compliance with an applicable legal obligation.

In addition, you may request in certain situations that we restrict our processing of your personal data. This means you can limit the way we use your data. We will still store your restricted personal data, but we will not use it.

### **DATA PORTABILITY**

If you reside at the territory of the European Economic Area, you may request that we provide you with the personal data that we hold on file about you and, where technically feasible, to transmit that data to another organisation. Please note that there are limitations to this under relevant laws.

### **RIGHT TO OBJECT TO PROCESSING JUSTIFIED ON LEGITIMATE INTEREST GROUNDS**

You may object to the way we process your personal data where we process it based on legitimate interest. In which case, we shall no longer process this personal data unless we can demonstrate compelling legitimate grounds to resume, or we need to process the data for the establishment, exercise or defence of legal claims. To find out when we process your personal data based on legitimate interest please refer to section 5 of this Notice.

# 10

## HOW TO CONTACT US AND FURTHER DETAILS

If you'd like any more details, or you have comments or questions about our Notice, write to us at:

**Data Protection Officer** by email [Roberto.Perniciaro@dentsuaegis.com](mailto:Roberto.Perniciaro@dentsuaegis.com)

or post at:

**Dentsu Aegis Network Netherlands B.V**  
**Moermanskkade 85**  
**1012 BC**  
**Amsterdam**  
**The Netherlands**

If you want to make a complaint on how we handle your personal information, please contact the Global Data Protection Officer who will investigate the matter and report back to you. If you are not satisfied with our response or believe that we are not using your personal information in line with the law, you also have the right to complain to the data protection authority in the country where you live or work. For the Netherlands, that's the Dutch Data Protection Authority- <https://autoriteitpersoonsgegevens.nl/en>.

### **HOW WILL WE NOTIFY YOU OF CHANGES TO THE NOTICE?**

Our Notice might change from time to time. We'll notify you about any changes to the Notice by posting on our website or Neon.

## GLOSSARY

WORD OR PHRASE	WHAT DOES IT MEAN?
<b>DAN organisation</b>	The specific DAN entity that entered into an employment contract or relationship or a contract for services with you.
<b>Data Controller</b>	<p>The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.</p> <p>This will be the DAN organisation that entered into an employment agreement or contract for services with you. It may also include other DAN organisations that need to process your personal data for their own purposes.</p>
<b>Other DAN organisations</b>	The parents, affiliates, and/or subsidiaries of the DAN organisation described above.
<b>Processing (or Processed)</b>	Any operation which is performed on personal data - such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
<b>Personal Data</b>	Personal information means information that identifies you as an individual, or is capable of doing so. Any information relating to an identified or identifiable person. An identifiable person is someone who can be identified, directly or indirectly, by reference to details 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 person.