

Global Privacy Principles

At Dentsu Aegis Network (“DAN”, “we” or “us”), we believe that the responsible use of data supports business growth and strong relationships between brands and consumers. In working to deliver effective marketing for our clients, we may from time to time collect, store and use personal information entrusted to us by our clients and suppliers. Therefore, robust and effective data protection is of paramount importance to us.

We are committed to respecting and protecting the privacy of anyone with whom we interact and only process personal information in accordance with applicable privacy and data protection laws.

Our approach to privacy and data protection

Our approach to privacy and data protection is tied to one of our core business objectives – to earn and maintain our clients’ trust by using personal information in a responsible way that benefits both our clients and their consumers, while always protecting the privacy of consumers.

At DAN, we believe that:

- the responsible use of personal information in advertising can benefit consumers by enabling more relevant marketing communications, tailored products and services,
- the responsible use of personal information can benefit consumers by enabling more meaningful engagement with our clients,
- consumers should always be provided with visibility and information about how their personal information is being used, whether by DAN or our clients, and
- the application of robust due-diligence and oversight of suppliers in the data sector promotes a compliant and ethical supply chain.

Our privacy principles

As part of our commitment to the responsible handling of personal information, these Principles explain how we handle personal information.

1. Fair, lawful and transparent use of personal information

Where appropriate, DAN will make sure that individuals know about, and consent to, our collection and use of their personal information. In some circumstances, it will be more appropriate for that privacy notice to be provided by our clients or suppliers. DAN will only ever use personal information in line with relevant instructions from either clients or suppliers.

2. Only using personal information for specific, explicit and legitimate purposes

DAN will only use personal information as permitted by data protection laws and within the limits of the purposes set out in our privacy policies, notices, or contracts with clients and suppliers.

3. Non-excessive collection of personal information

DAN will only collect and retain the necessary personal information required to fulfil the specified purpose.

4. Accurate personal information

DAN will work with clients and suppliers to ensure that personal information used for marketing purposes is accurate and kept up to date.

5. Retaining personal information

DAN will not keep personal information for longer than is necessary for the purpose or purposes for which they were collected.

6. Data security

DAN will ensure that it has appropriate security measures in place to prevent unlawful or unauthorised use, access or accidental loss of personal information.

7. Accountability

DAN will take all necessary measures to observe these Principles as a key component of our Code of Conduct and our wider compliance efforts. Recognising that we are responsible for the personal information under our control, we have designated individuals to be responsible for compliance with these Principles and applicable data protection laws.

DAN's Global Data Protection Officer, working collaboratively with our internal network of data protection experts, including lawyers, local data protection officers, and technology specialists, is responsible for:

- monitoring compliance with applicable data protection laws,
- overseeing data protection and privacy training for staff and conducting related audits,
- ensuring that "privacy by design" is incorporated into DAN's products and services,
- providing advice regarding data protection impact assessments and monitoring their performance, and
- acting as a single point of contact for data protection authorities on matters relating to the use of personal information by DAN.

Any questions about these Principles or data protection compliance at DAN should be referred to privacy@dentsuaegis.com.