

## **HVL Privacy and Data Protection Policy**

Havas is committed to protecting your privacy and personal data.

Havas (“we”, “our”) is committed to protecting your personal data and your privacy. We encourage you to carefully read this Data Protection Policy (“Policy”). This Policy informs you of our data protection and privacy practices and the way your personal data is collected and used by Havas. This Policy is readily available on our home page and at the bottom of each page of this Website. Havas strongly supports the fundamental rights to privacy and data protection as well as compliance with national and international privacy laws. This Policy is applicable to all Havas UK entities which collect, process, use, transfer and store personal data.

### **How we process your personal data**

Havas respects the rights of each individual to have their privacy and personal data protected. Havas will observe the following principles when processing your personal data:

1. Processing your personal data fairly, lawfully and in a transparent manner;
2. Collecting your personal data for specified, legitimate purposes and not processing further in ways incompatible with those purposes;
3. Collecting your personal data which is relevant to and not excessive for the purposes for which it is collected and used. We may render personal data anonymous when feasible and appropriate, depending on the nature of the data and the risks associated with the intended uses;
4. Maintaining your personal data and ensuring it is accurate, and where necessary, kept up-to-date. We will take reasonable steps to rectify or delete data that is inaccurate or incomplete;
5. Keeping your personal data only as long as it is necessary for the purposes for which it was collected and processed;
6. Processing your personal data in accordance with the individual’s legal rights;
7. Taking appropriate technical and organizational security measures to keep your data safe and prevent unauthorized access, unlawful processing, and unauthorized or accidental loss, destruction, or damage to personal data;
8. Processing your personal data only if it is lawful in accordance with a legal basis including if you have unambiguously given your consent to such processing.

### **What data is collected?**

In its capacity as data controller, Havas collects and processes your personal data after informing you accordingly. Personal data is any information relating to an identified or identifiable natural person. An identifiable person is a person who can be identified, directly or indirectly, in particular by reference to an identifier or to one or more factors specific to their physical, physiological, mental, economic, cultural or social identity.

This Policy does not cover data rendered anonymous, i.e. when individuals are no longer identifiable or are identifiable only with a disproportionately large expense in time, cost and labour. If anonymous data becomes identifiable, or if pseudonyms are used and allow individuals to be identified, then this Policy will apply.

It is up to you whether or not to disclose personal data to us. However, if you choose not to do so, we reserve the right not to register you as a user or not to provide you with the requested service.

In general, your personal data is collected directly from you, but it may also be collected from third parties. The types of personal data we process include:

- **contact information:** for example, your first name, last name, pseudonym, gender, email address, postal address, telephone number;
- **identification documents/data:** for example, your passport details where we are arranging travel on your behalf, photographs, social media profiles;
- **your professional data:** for example, your educational and professional background for job applicants, your job title, home company, or other application data for example where you apply for a programme/event;
- **your login data:** your IP address, if applicable, your online ID, your Havas online user password;
- **competition data:** for example, your name, contact details, location and, if applicable, proof of age;
- **your browsing data and expressed preference:** traffic and browsing history on Havas websites, data from cookies and trackers on Havas websites; and
- **data related to your participation in any of our events and/or programmes:** for example, biographical information, your qualifications, professional experience and employer, your image, audio and likeness (as captured on a webinar, in photographs or on recordings we make of the event, and on CCTV where the event is hosted at our premises), medical information (e.g. allergy information) relevant for your participation, your views/interests expressed whilst participating.

In general, and with some exceptions, the use of Havas websites and Havas pages on social networks is reserved for adults.

#### **Purpose, Legal Basis and Data Retention Period**

The processing operations carried out by Havas have the following purposes, legal bases and retention periods:

<b>Purposes</b>	<b>Legal basis</b>	<b>Retention period</b>
Customer relationship management	<ul style="list-style-type: none"> <li>• Performance of the contract</li> <li>• Legal obligation (accounting/ tax/ administrative)</li> </ul>	Term of the contract plus applicable limitation periods
Partner and supplier relationship management	<ul style="list-style-type: none"> <li>• Performance of the contract</li> <li>• Legal obligation (accounting/tax /administrative)</li> </ul>	Term of the contract plus applicable limitation periods
Application management	<ul style="list-style-type: none"> <li>• Legitimate interest of Havas</li> </ul>	2 years
Product and institutional communication management (website and social networks)	<ul style="list-style-type: none"> <li>• Legitimate interest of Havas</li> </ul>	Duration of the communication plus applicable limitation periods
B2B marketing	<ul style="list-style-type: none"> <li>• Legitimate interest of Havas</li> <li>• Consent</li> </ul>	Duration of the related marketing activities plus applicable limitation periods
Administrative and legal formalities and the fight against fraud	<ul style="list-style-type: none"> <li>• Legal and regulatory obligation</li> </ul>	Duration of applicable legal requirements

Subscription to newsletters	<ul style="list-style-type: none"> <li>• Consent and/or legitimate interests of Havas (as applicable, in accordance with laws)</li> </ul>	Duration of subscription to the newsletter
Management of cookies and other website trackers	<ul style="list-style-type: none"> <li>• Consent</li> <li>• Legitimate interest of Havas (technical cookies)</li> </ul>	Periods specified in the website cookies policy
Management and follow-up of contact requests	<ul style="list-style-type: none"> <li>• Legitimate interest of Havas</li> </ul>	Time required to process the request
Reporting and securing access to websites	<ul style="list-style-type: none"> <li>• Legitimate interest of Havas</li> </ul>	6 months to 1 year maximum
Exercising your personal data rights	<ul style="list-style-type: none"> <li>• Legal and regulatory obligation</li> </ul>	1 year or 6 years from the request to exercise the right, according to the right exercised
Participation in any of our events and/or programmes	<ul style="list-style-type: none"> <li>• Legitimate interest of Havas</li> <li>• Consent</li> <li>• Performance of the contract</li> </ul>	Duration of the event/programme and related marketing activities plus applicable limitation periods
Participation in any of our prize draws and competitions	<ul style="list-style-type: none"> <li>• Legitimate interest of Havas</li> <li>• Consent</li> </ul>	Duration of the prize draw/competition and related marketing activities plus applicable limitation periods

In the event of litigation/proceedings, particularly legal proceedings, initiated before the end of the above periods and which require the retention of personal data, particularly with a view to the establishment, exercise or defence of rights, such personal data shall be retained for the duration of said proceedings and until the exhaustion of the legal remedies.

### **Who Are the Recipients of Your Data?**

We may share your personal information within our group of companies.

We may share your personal information with our suppliers, business partners and service providers, where they are helping us to market and advertise our services as well as where they are helping to provide services to you.

For example, where you participate in an event/programme, we may share your personal data with the promotor/sponsor of the event/programme. In other cases and more generally, we may share your personal data with hosting providers of our websites, our auditors and statutory auditors, our legal advisers, our insurers, our duly authorized partners, service providers and subcontractors which we may use to carry out our activities, tax and social security bodies, public authorities, court officers and ministerial officers where applicable.

### **Data Transfer**

Your personal data collected and processed for the purposes described above may in certain cases be transmitted to companies outside of the UK, including countries, which have less strict, or no data protection laws, when compared to those in the EEA or the UK.

Whenever we transfer your information as described in the paragraph above, we will take steps which are reasonably necessary to ensure that adequate safeguards are in place to protect your personal information and to make sure it is treated securely and in accordance with this privacy notice. In these cases, we rely on approved data transfer mechanisms (such as standard contractual clauses) to ensure your information is subject to adequate safeguards in the recipient country. If you are located

in the UK or the EEA, you may contact us for a copy of the safeguards which we have put in place to protect your personal information and privacy rights in these circumstances.

### **Links to third-party websites**

Havas websites or services may provide links to third-party applications, products, services, or websites for your convenience and information. If you access those links, you will leave the Havas website. Havas does not control those third-party websites or their privacy practices, which may differ from our practices. We do not endorse or make any representations about third-party websites. The personal data you choose to provide to or that is collected by these third parties are not covered by this Policy. We encourage you to review the privacy policy of any website you interact with before allowing the collection and use of your personal data. We may also provide social media links that enable you to share data with your social networks and to interact with Havas on various social media sites. Your use of these links may result in the collection or sharing of data about you, depending on the feature. We encourage you to review the privacy policies and settings on the social media sites with which you interact to make sure you understand the data that may be collected, used, and shared by those sites. If you post, comment, indicate interest, or share personal data, including photographs, to any public forum, social network, blog, or other such forum, please be aware that any personal data you submit can be read, viewed, collected, or used by other users of these forums, and could be used to contact you, send you unsolicited messages, or for purposes that neither you nor Havas have control over. Havas is not responsible for the personal data you choose to submit in these forums.

### **Your data protection rights**

You have certain rights in relation to your personal information, as listed below. We will handle any request to exercise your rights in accordance with applicable law and any relevant legal exemptions.

#### **Right of access**

As data subjects you may inquire as to the nature of the personal data Havas holds about you. You will be provided access to your personal data regardless of the location of the data processing and storage.

#### **Right to rectification**

If your personal data is inaccurate or incomplete, you may request that the data is amended.

#### **Right to object**

You have the right to object at any time to the processing of your personal data by Havas.

#### **Right to erasure**

You can ask for the deletion of your personal data when it is allowed by applicable laws and regulations.

#### **Right to restriction of processing**

You have the right to request the processing of your personal data to be restricted when it is permitted by applicable laws and regulations.

#### **Right to data portability**

If you meet the conditions settled by the applicable laws and regulations, you have the right to receive a subset of your personal data and to transmit it from Havas to another data controller.

#### **Right to lodge a complaint**

You have the right to lodge a complaint with the competent supervisory authority.

All requests for aforementioned rights, and any questions regarding this Data Protection Policy, may be sent to: Havas Data Protection Officer [Data.protectionuk@havas.com](mailto:Data.protectionuk@havas.com)

### **Changes to this Policy**

Havas reserves the right to modify this Policy as needed, for example, to comply with changes in laws, regulations, Havas practices and procedures, or requirements imposed by data protection authorities.

**Last update: May 2026**