

EXTERNAL PRIVACY NOTICE

Last Updated 22 May 2018

We respect the privacy of every person who visits or registers with cheil.london (the “**Site**”) and we are further committed to ensuring a safe online experience. We also respect the privacy of every person who uses the services that we make available from the Site or who engages with us to use the services that Cheil provides (be it through the Site or not) (our “**Services**”) or whose personal information we may process as a result of providing the Services to others or who applies to work at Cheil.

1 PURPOSE OF THIS POLICY

This privacy notice (“**Privacy Notice**”) explains our approach to any personal information that we might collect from you or which we have obtained about you from a third party and the purposes for which we process your personal information. This Privacy Notice also sets out your rights in respect of our processing of your personal information.

This Privacy Notice will inform you of the nature of the personal information about you that is processed by us and how you can request that we delete, update, transfer and/or provide you with access to it.

This Privacy Notice is intended to assist you in making informed decisions when using the Site and our Services and/or to understand how your personal information may be processed by us as a result of providing the Services to others or when you apply to work at Cheil. Please take a moment to read and understand it. Please note that when using the Site it should be read in conjunction with our Website Terms of Use.

Please also note that this Privacy Notice only applies to the use of your personal information obtained by us, it does not apply to your personal information collected during your communications with third parties.

2 WHO ARE WE AND WHAT DO WE DO?

The Site and our Services are operated by Cheil Europe Limited, (“**we**”, “**us**” or “**our**”).

Cheil Europe Limited is the data controller responsible for your personal information processed via the Site.

Cheil Europe Limited is a UK company with registered company number 04909746 and whose registered office is at The Crane Building, 22 Lavington Street, London, SE1 0NZ.

Please note that depending on with which Cheil entity you contract in relation to the Services third party entities may also be data processors responsible for your personal information processed in relation to the Services. For more information please contact the Chief Information Office at cio.uk@cheil.com

3 HOW TO CONTACT US?

If you have any questions about this Privacy Notice or want to exercise your rights set out in this Privacy Notice, please contact us by:

- sending an e-mail to cio.uk@cheil.com

4 WHAT PERSONAL INFORMATION DO WE COLLECT AND HOW DO WE USE IT?

Our primary goal in collecting personal information from you may be to: (i) verify your identity; (ii) help us deliver our Services; (iii) improve, develop and market new Services; (iv) carry out requests made by you on the Site or in relation to our Services; (v) investigate or settle inquiries or disputes; (vi) comply with any applicable law, court order, other judicial process, or the requirements of a regulator; (vii) enforce our agreements with you; (viii) protect the rights, property or safety of us or third parties, including our other customers or subscribers and users of the Site or our Services; (ix) provide support for the provision of our Services; (x) recruitment purposes; and (xi) use as otherwise required or permitted by law.

To undertake these goals we may process the following personal information:

If you are a **visitor** to the Site:

- *Name and job title.*
- *Contact information including email address.*
- *Demographic information such as postcode, preferences and interests.*
- *Other information relevant to provision of Services.*

If you are an **individual customer or subscriber** in receipt of our Services or **prospective individual customer or subscriber**:

- *Name and job title.*
- *Contact information including email address.*
- *Payment information.*
- *Other information relevant to provision of Services.*
- *Information that you provide to us as part of our providing the Services to you which depends on the nature of your agreement with Cheil.*
- *Relevant information as required by regulatory Know Your Client and or Anti Money Laundering regulations. This may possibly include evidence of source of funds, at the outset of and possibly from time to time throughout our relationship with clients, which we may request and/or obtain from third party sources. The sources for such verification may comprise documentation which we request from the prospective client or through the use of online sources or both.*

Primarily Cheil is engaged by corporate customers (i.e. other corporate entities) and as such those customers are not data subjects. However as part of such instructions personal information about other persons may be provided to us (e.g. personal information relating, without limitation, to any of our corporate clients' or prospective clients' workers or subscribers.)

If you are an **individual whose personal information may be processed by us as a result of providing the Services to others (including individual clients and corporate clients)** we will process a variety of different personal information depending on the Services provided in question.

The following is a non-exhaustive list which is reflective of the varied nature of the personal information processed as part of our business.

For instance, if we are providing technical support to a corporate customer for the benefit of a subscriber we may be provided with, and then process, personal information about that subscriber including but not limited to the subscriber's name and contact details.

We might also need to process personal information in relation to corporate customers' workers who use Cheil services in the course of their work for our corporate customer.

If you are a **potential recruit** to a Cheil office:

- *Name and job title.*
- *Contact information including email address.*
- *Curriculum vitae, your education, employment history and similar matters and similar information that you may provide to us.*
- *Other information relevant to potential recruitment to Cheil.*

In particular, we may use your personal information for the following purposes:

➤ **Fulfilment of Services**

We collect and maintain personal information that you voluntarily submit to us during your use of the Site and/or our Services to enable us to perform the Services. Please note also that our Terms of Business also apply when we provide the Services.

Who do we share your personal information with for this purpose?

We may share personal information with a variety of the following categories of third parties as necessary when providing the Services:

- *IT providers;*
- *Third party creative service providers; and*
- *Third party social media platforms.*

Please note this list is non-exhaustive and there may be other examples where we need to share with other parties in order to provide the Services as effectively as we can.

What is our legal basis?

It is necessary for us to use your personal information to perform our obligations in accordance with any contract that we may have with you or it is in our legitimate interest or a third party's legitimate interest to use personal information in such a way to ensure that we provide the Services in the best way that we can.

➤ **Client services**

Our Site uses various user interfaces to allow you to request information about our Services: these include a dedicated recruitment email address and a telephone enquiry service. Contact information may be requested in each case, together with details of other personal information that is relevant to your Service enquiry. This information is used in order to enable us to respond to your requests.

Who do we share your personal information with for this purpose?

We do not share your personal information for this purpose.

What is our legal basis?

It is in our legitimate interest or a third party's legitimate interest to use your personal information in such a way to ensure that we provide the very best client service we can to you or others.

➤ **Your feedback about our Services**

From time to time we will contact you to invite you to provide feedback about our Services

in the form of online or postal surveys. We use this information to help us improve the quality of service provided by our staff. We also use your feedback to monitor and improve the quality of our Services and our Site.

Who do we share your personal information with for these purposes?

We use a third party service provider to assist us with client surveys and feedback requests.

What is our legal basis?

It is in our legitimate business interests to use the information you provide to us in your feedback for the purposes described above.

➤ **Prize draws, prize competitions and other promotions.**

From time to time, we may run prize draws, prize competitions and other promotions on our Site and/or on our social media accounts. For the purposes of administering such promotions and distributing any prizes or gifts, we may process your personal information such as your name and contact details (including email address, postal address and/or telephone number, as applicable) and, if relevant, your age, gender, job role, social media handle, payment details and any other personal information volunteered by you in your promotion entry.

Who do we share your personal information with for these purposes?

We may share personal information with specialist suppliers who assist us in administering our competitions, prize draws and other promotions.

What is our legal basis?

It is necessary for us to use your personal information to perform our obligations in accordance with any contract that we may have with you (e.g. the terms and conditions applicable to the promotion to which you may be asked to agree as a condition of entry) or it is in our legitimate interest to use your personal information to enable you to participate in any prize draws, prize competitions and other promotions.

➤ **Business administration and legal compliance**

We use your personal information for the following business administration and legal compliance purposes:

- *to comply with our legal obligations;*
- *to enforce our legal rights;*
- *protect rights of third parties; and*
- *in connection with a business transition such as a merger, acquisition by another company, or sale of all or a portion of our assets.*

Who do we share your personal information with for these purposes?

We will share your personal information with professional advisers such as lawyers and accountants and/or governmental or regulatory authorities.

What is our legal basis?

Where we use your personal information in connection with a business transition, to enforce our legal rights, or to protect the rights of third parties it is in our or a third party's legitimate interest to do so. For all other purposes described in this section, it

is our legal obligation to use your personal information to comply with any legal obligations imposed upon us.

➤ **Recruitment**

We use your personal information for the following recruitment purposes:

- To assess your suitability for any position for which you may apply at Cheil whether such application has been received by us online, via email or by hard copy or in person application.
- To review Cheil's equal opportunity profile in accordance with applicable legislation, and ensure Cheil does not discriminate on the grounds of gender, race, ethnic origin, age, religion, sexual orientation, disability or any other basis covered by local legislation. All employment related decisions are made entirely on merit

Who do we share your personal information with for these purposes?

We do not share your personal data for recruitment purposes.

What is our legal basis?

Where we use your personal information in connection with recruitment it will be in connection with us taking steps at your request to enter a contract we may have with you or it is in our legitimate interest to use personal information in such a way to ensure that we can make the best recruitment decisions for Cheil. We will not process any special data except where we are able to do so under applicable legislation or with your explicit consent.

➤ **Client insight and analysis**

We analyse your contact details with other personal information that we observe about you from your interactions with our Site, our email communications to you and/or with our Services such as the Services you have viewed.

Where you have given your consent (where lawfully required), we use cookies, log files and other technologies to collect personal information from the computer hardware and software you use to access the Site, or from your mobile. This includes the following:

- an IP address to monitor Site traffic and volume;
- a session ID to track usage statistics on our Site;
- information regarding your personal or professional interests, demographics, buying habits, experiences with our products and contact preferences.

Our web pages contain "cookies" "web beacons" or "pixel tags." ("**Tags**"). Tags allow us to track receipt of an e-mail to you, to count users that have visited a web page or opened an e-mail and collect other types of aggregate information. Once you click on an e-mail that contains a Tag, your contact information may subsequently be cross-referenced to the source e-mail and the relevant Tag.

In some of our e-mail messages, we use a "click-through URL" linked to certain website administered by us or on our behalf.

Please see our cookie policy for further information.

By using this information, we are able to measure the effectiveness of our content and how visitors use our Site and our Services. This allows us to learn what pages of our Site are most attractive to our visitors, which parts of our Site are the most interesting and what kind of offers our registered users like to see.

We also use this information for marketing purposes (see the marketing section below for further details).

Who do we share your personal information with for these purposes?

We share your personal information with a variety of third party service providers to assist us with client insight analytics. These providers include for example Google Analytics. Other providers are described in our Cookie Policy.

What is our legal basis?

Where your personal information is completely anonymised, we do not require a legal basis to use it as the information will no longer constitute personal information that is regulated under data protection laws. However, our collection and use of such anonymised personal information may be subject to other laws where your consent is required. Please see our Cookie Policy for further details.

Where your personal information is not in an anonymous form, it is in our legitimate interests to use your personal information in such a way to ensure that we provide the very best products and services to you and our other clients.

➤ **Marketing communications.**

We carry out the following marketing activities using your personal information:

○ **Email marketing**

We use information that we observe about you from your interactions with our Site, our email communications to you and/or with our Services (see the Client Insight and Analysis section above for more details of the information collected and how it is collected) and/or your email address, to send you marketing communications by email, where you have consented to receive such marketing communications, or where we have another lawful basis to do so.

Who do we share your personal information with for these purposes?

We share your personal information with a variety of third party email marketing providers who assist us in delivering our email marketing campaigns to you.

What is our legal basis?

Where your personal information is completely anonymised, we do not require a legal basis to use it as the personal information will no longer constitute personal information that is regulated under data protection laws. However, our collection and use of such anonymised personal information may be subject to other laws where your consent is required. Please see our Cookie Policy for further details.

Where your personal information is not in an anonymous form, it is in our legitimate interest to use your personal information for marketing purposes. We will only send you marketing communications via email where you have consented to receive such marketing communications, or where we have a lawful right to do so.

- Any other purposes for which we wish to use your personal information that are not listed above, or any other changes we propose to make to the existing purposes will be notified to you using your contact details.

5 HOW DO WE OBTAIN YOUR CONSENT?

Where our use of your personal information requires your consent, you can provide such consent:

- at the time we collect your personal information following the instructions provided; or
- by informing us by e-mail, post or phone using the contact details set out in this Privacy Notice.

6 OUR USE OF COOKIES AND SIMILAR TECHNOLOGIES

Our Site uses certain cookies, pixels, beacons, log files and other technologies of which you should be aware. **Please see our Cookie Policy** to find out more about the cookies we use and how to manage and delete cookies.

7 THIRD PARTY CONTRACTORS AND OTHER CONTROLLERS

As mentioned above, we may appoint sub-contractor data processors as required to deliver the Services, such as, without limitation, Adobe Analytics and Google Analytics, who will process personal information on our behalf and at our direction. We conduct an appropriate level of due diligence and put in place necessary contractual documentation in relation to any sub-contractor to ensure that they process personal information appropriately and according to our legal and regulatory obligations.

Further, we may appoint external data controllers in common where necessary to deliver the Services (for example, but without limitation other Cheil entities). When doing so we will comply with our legal and regulatory obligations in relation to the personal information including but without limitation where necessary putting appropriate safeguards in place to ensure any personal information is processed according to our legal and regulatory obligations.

8 EXTRA-EEA TRANSFERS

If you are based within the EEA, please note that where necessary to deliver the Services we will transfer personal information to countries outside the EEA (including to Cheil HQ in South Korea) and other Cheil entities via the Cheil Data Sharing Agreement which utilises model contracts as the extra-EEA transfer mechanism). When doing so we will comply with our legal and regulatory obligations in relation to the personal information including but without limitation having a lawful basis for transferring personal information and putting appropriate safeguards in place to ensure an adequate level of protection for the personal information.

9 HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION FOR?

Regarding visitors to the Site, Cheil will retain relevant personal information for at least three years from the date of our last interaction with you and in compliance with our obligations under the EU General Data Protection Regulation (or similar legislation around the world) (or for longer as we are required to do so according to our regulatory obligations or professional indemnity obligations).

Regarding personal information we have processed as part of providing the Services to any

client, we will retain relevant personal information for at least six years from the date of our last interaction with that client and in compliance with our obligations under the EU General Data Protection Regulation (or similar legislation around the world) (or for longer as we are required to do so according to our regulatory obligations or professional indemnity obligations). We may then destroy such files without further notice or liability. If you request your files and documents we may charge you for the costs of copying a duplicate.

If personal information is only useful for a short period e.g. for specific marketing campaigns we may delete it.

10 CONFIDENTIALITY AND SECURITY OF YOUR PERSONAL INFORMATION

We are committed to keeping the personal information provided to us secure and we will take reasonable precautions to protect personal information from loss, misuse or alteration.

We have implemented information security policies, rules and technical measures to protect the personal information that we have under our control from:

- *unauthorised access;*
- *improper use or disclosure;*
- *unauthorised modification; and*
- *unlawful destruction or accidental loss.*

All of our members, employees, workers and data processors (i.e. those who process your personal information on our behalf, for the purposes listed above), who have access to, and are associated with the processing of personal information, are obliged to respect the confidentiality of the personal information of all visitors to the Site and all users of our Services.

11 HOW TO ACCESS YOUR INFORMATION AND YOUR OTHER RIGHTS?

You have the following rights in relation to the personal information we hold about you:

➤ **Your right of access**

If you ask us, we'll confirm whether we're processing your personal information and, if necessary, provide you with a copy of that personal information (along with certain other details). If you require additional copies, we may need to charge a reasonable fee.

➤ **Your right to rectification**

If the personal information we hold about you is inaccurate or incomplete, you're entitled to have it rectified. If you are entitled to rectification and if we've shared your personal information with others, we'll let them know about the rectification where possible. If you ask us, where possible and lawful to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

➤ **Your right to erasure**

You can ask us to delete or remove your personal information in some circumstances such as where we no longer need it or if you withdraw your consent (where applicable). If you are entitled to erasure and if we've shared your personal information with others, we'll let them know about the erasure where possible. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your personal

information with so that you can contact them directly.

➤ **Your right to restrict processing**

You can ask us to 'block' or suppress the processing of your personal information in certain circumstances such as where you contest the accuracy of that personal information or you object to us. If you are entitled to restriction and if we've shared your personal information with others, we'll let them know about the restriction where it is possible for us to do so. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

➤ **Your right to data portability**

With effect from 25 May 2018, you have the right, in certain circumstances, to obtain personal information you've provided us with (in a structured, commonly used and machine readable format) and to reuse it elsewhere or to ask us to transfer this to a third party of your choice.

➤ **Your right to object.**

You can ask us to stop processing your personal information, and we will do so, if we are:

- relying on our own or someone else's legitimate interests to process your personal information, except if we can demonstrate compelling legal grounds for the processing; or
- processing your personal information for direct marketing.

➤ **Your rights in relation to automated decision-making and profiling**

You have the right not to be subject to a decision when it's based on automatic processing, including profiling, if it produces a legal effect or similarly significantly affects you, unless such profiling is necessary for entering into, or the performance of, a contract between you and us.

➤ **Your right to withdraw consent**

If we rely on your consent (or explicit consent) as our legal basis for processing your personal information, you have the right to withdraw that consent at any time.

➤ **Your right to lodge a complaint with the supervisory authority**

If you have a concern about any aspect of our privacy practices, including the way we've handled your personal information, you can report it to the UK Information Commissioner's Office (ICO). You can find details about how to do this on the ICO website at <https://ico.org.uk/concerns/> or by calling their helpline on 0303 123 1113.

12 COLLECTION OF INFORMATION BY THIRD-PARTY SITES AND SPONSORS

The Site contains links to other sites whose information practices may be different than ours. Visitors should consult the other sites' privacy notices as Cheil has no control over information that is submitted to, or collected by, these third parties

13 CHANGES TO THIS PRIVACY NOTICE

We may make changes to this Privacy Notice from time to time.

To ensure that you are always aware of how we use your personal information we will update this Privacy Notice from time to time to reflect any changes to our use of your personal information. We may also make changes as required to comply with changes in applicable law or regulatory requirements. We will notify you by e-mail of any significant changes. However,

we encourage you to review this Privacy Notice periodically to be informed of how we use your personal information.