

## TBWA\ITALIA GROUP: WEB site Privacy Policy

**Updated on: 25/5/2018**

The TBWA Italia Group (“**TBWA**”) shall take the utmost care to safeguard its users’ privacy and protect their personal data. This Privacy Policy describes the types of personal data we collect on [www.tbwa.it](http://www.tbwa.it) (the “**Website**”), how we may use that data and the categories of persons with whom we share them. The Privacy Policy also describes the measures we adopt to safeguard personal data, the length of time we keep them and how users may contact us for any information about how we process their personal data and to exercise their rights.

### Introduction

Under Article 13 and Article 14 of Regulation (EU) No. 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the European General Data Protection Regulation, hereinafter, the “**Regulation**” or the “**GDPR**”) and repealing Directive 95/46/EC, we inform you that the personal data you voluntarily provided to TBWA will be processed in compliance with current legislation regarding the protection of personal data and, in any event, the principles of confidentiality on which the Company’s business is founded.

In particular, the processing of users’ personal data will be carried out by the following companies of the TBWA Group, TWBA/Italia S.p.A. and Integer s.r.l. as joint controllers (together, the “**Joint Controllers**”, individually, the “**Controller**”).

This Privacy Policy explains how TBWA uses and protects any information that users provide when using this Website.

- TBWA is committed to ensuring that your privacy is protected in the best possible way. If we ask you to provide certain information with which users can be identified when using this Website, such data will be used only in accordance with this Privacy Policy.
- TBWA may change this policy from time to time by updating this page. The end user is obligated to check this page from time to time to check for any changes.

### Type of data processed

TBWA will process your personal data in the context of the use of the Website that is provided in the “**Contact Us**” area. In general, our websites may be visited without having to provide any personal data. The provision of your personal data is therefore optional.

In addition, the computer systems and procedures that permit the Website’s operations acquire, during their normal operations, some personal data whose transmission is implicit in the use of Internet communication protocols. This information is not collected to be associated to identified data subjects, but by their very

nature could, through processing and association with data held by third parties, allow users to be identified. This category of data includes, for example, IP addresses or domain names of computers used by users who connect to the Website, the URI (Uniform Resource Identifier) addresses of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in reply, the numerical code indicating the status of the response provided by the server (successful, error, etc.) and other parameters relating to the user's operating system and computer environment.

Some pages of TBWA's Website make use of Cookies (see Paragraph on "cookies") to facilitate your visit to our Website. To learn more about the Cookies we use, please refer to our Cookie Policy in our Home page.

### Purpose and legal basis of the processing

Your personal data may be used for the following purposes:

- a) to allow users to know and study, by browsing on the Website itself, the activities and services offered by the Joint Controllers and to check the proper functioning of the Website; they are also processed to ascertain liability in the event of cybercrimes against the Website;
- b) where provided voluntarily, your personal data will be processed to handle requests made in the "Contact Us" area;
- c) when sending your CV, your personal data will be processed solely for the purpose of evaluating entering into a potential contractual relationship for collaboration or employment;
- d) to provide feedback to any request from the competent authorities in accordance with legal or regulatory obligations.

### Security and data retention

We are committed to ensuring the security of users' personal data, in accordance with the principles of fairness, loyalty and transparency.

In order to prevent access to or disclosure of such information to unauthorised persons, we have put in place appropriate physical, electronic, and managerial procedures to safeguard and secure the information we collect.

The data collected will be retained for a period not exceeding the time necessary to achieve the purposes for which they were collected and not longer than necessary to fulfil statutory requirements.

In the case of the data in your CV, these will not be kept longer than three (3) months from the date on which they were provided.

### Cookies

A cookie is a small file that asks permission to be placed on the hard disk of the data subject's computer. Once accepted, the file is added and will help analyse web traffic or to know when a particular site is visited. Cookies allow Website applications to respond to you as an individual. The web application may tailor its operations to your needs, by collecting and remembering the preferences made.

We use cookies to register traffic to identify which pages are being used. This helps us analyse data about web-page traffic and improve our Website in order to tailor it to customers' needs. We use this information only for statistical analysis purposes and, therefore, the data are removed from the system.

Overall, cookies help us provide a better web service, by enabling us to monitor which pages you find useful and which are not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You may choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser settings to decline cookies, if you prefer. This may prevent you from taking full advantage of the Website.

For further information about cookies please refer to the policy at our Home page.

### External links

Our Website may contain links to other websites such as those of affiliates and other activities of the Omnicom Group or to external services such as, for example, to Vimeo or YouTube.

However, when you use these links to leave our Website, we no longer have any control over these websites, so we cannot be held responsible for the protection and privacy of any information you provide whilst visiting such sites and such sites are not governed by this Policy.

You should use caution and review the Privacy Policy applicable to the Website or service in question.

### Scope of communication and disclosure of data

Furthermore, the processing of personal data may also be carried out by:

- corporate entities or consortia that provide our Company with data processing services or that carry out activities that are instrumental or complementary to ours;
- persons whose right to access your personal data is recognised by law or by regulations, both national and European.

These persons may process personal data while acting as data processors, duly bound to comply with the obligations of law and confidentiality, or while acting as independent data controllers.

In no event will your personal data be the subject of disclosure.

Furthermore, we may disclose your personal data also in the following events: (1) to exercise or defend a legal claim in court; (2) in connection with an investigation of suspected or actual illegal activities; (3) in the event that we sell or transfer all or a portion of our business or our company (also in cases of reorganisation, dissolution or liquidation); or (4) in any event with your consent.

### Transfers of personal data outside the EEA

Due to the corporate structure of the TBWA Group, of which TBWA and Integer are part, your data may be transferred outside the European Economic Area for the purposes described above, to companies belonging to the TBWA Group. In any case, all the appropriate safeguards for the transfer will be taken, and you will be required to provide your express consent where necessary.

As regards intercompany transfers of data to the United States, TBWA\Worldwide is certified and relies on the “Privacy Shield” mechanism. TBWA’s Privacy Shield Policy is available at the following link: <http://tbwa.com/privacy-shield-policy>

### Rights of the Data Subject:

You may, at any time, exercise your rights with respect to your data, within the limits and under the conditions provided for in Article 7 and Articles 15 to 22 of the GDPR.

More specifically, the Data Subject has the right to:

- 1) access their personal data and the following information: the purpose of the processing; the categories of data processed; the recipients or categories of recipients to whom the personal data have been or will be disclosed; whenever possible, the period for which the personal data will be stored; the application or non-application of profiling and automated decision-making mechanisms;
- 2) have inaccurate personal data concerning him or her rectified and/or the erasure of his/her data in general, without undue delay;
- 3) have the restriction of processing;
- 4) object, in whole or in part, for legitimate reasons, to the processing of personal data concerning him or her, even where pertinent for collection purposes;
- 5) request the portability of the personal data concerning him or her, which he or she has provided to the Data Controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the Data Controller to which the personal data have been provided;
- 6) lodge a complaint with the Italian Data Protection Authority.

To exercise these rights, described below, the Data Subject may contact the Data Controller through the Privacy Office at the address referred to in the following paragraph. This request will be provided with an adequate response in accordance with the time frames provided for by the GDPR.

### Data Controller and nature of the provision

Your data is provided on a voluntary basis, however, the non-provision of such data might result in the failure to carry out your requests.

The Companies of the TBWA Group hereinafter indicated, as your counterparties, will be joint controllers of your personal data, in particular you may refer to:

TBWA\Italia S.p.A. with registered office at Via Leto Pomponio No. 3/5 in Milan, in the person of its Legal Representative. Any request relating to the personal data processed by TBWA may be sent to the registered office of the Company, or by writing to the e-mail address [privacy@TBWA.it](mailto:privacy@TBWA.it).

Integer S.r.l., with registered office at Via Leto Pomponio No. 3/5 in Milan, in the person of its Legal Representative. Any request relating to the personal data processed by INTEGER may be sent to the registered office of the Company, or by writing to the e-mail address [privacy-italia@integer.com](mailto:privacy-italia@integer.com).



An updated list of the Data Processors is available at the Companies and may be consulted by making a specific request submitted with the abovementioned procedures.