



## **HAVAS N.A. PRIVACY NOTICE FOR EMPLOYEES AND OTHER PERSONS PROVIDING SERVICES**

### **Introduction and scope of privacy notice**

This Privacy Notice describes the Personal Information that Havas North America, Inc. and its subsidiaries (“Havas”, “Company,” “we” or “us”) collect and how we use that Personal Information in connection with your working relationship with us, or with your application for a working relationship with us.

If you have any questions about this Privacy Notice, please email us at: [privacy.na@havas.com](mailto:privacy.na@havas.com)

### **Categories of Personal Information Collected**

For purposes of this Privacy Notice, “Personal Information” means any information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household. Personal Information excludes information that does not and cannot reveal an individual’s specific identity, such as information that has been de-identified or aggregated. Some of the Personal Information that we process about you comes from you. For example, you tell us your contact details. Other Personal Information about you is generated from references and third-party companies such as recruitment agencies and background screening service providers. Your Personal Information will be seen internally by managers, administrators and HR and your Personal Information may be available on our shared HR management system.

We may collect, store, and use the following types of Personal Information for the purposes set out below:

- Identifiers and Contact Information such as your name, home telephone number, cell phone number, mailing address, email address, bank account information, the name, telephone number, and mailing address of your designated emergency contact in order to contact you with relevant information or to contact your designated emergency contact in the event of a work-related accident or illness.
- Professional or Employment-Related Information and Education Information such as information provided through your resume or CV, personal or professional website or social media profile, background screening, performance information, aptitude, education history, disciplinary information, work history, skills, transcript, and references in order to evaluate your application for a working relationship with us and to comply with legal obligations or company policies. Additionally, some of this information may be referenced after you start working to make decisions relative to your relationship with us and otherwise manage your performance.
- The Personal Information you provide on our HR management system such as your photo, skills, education, certifications, training, achievements, interests, individual goals, development plans, personal cell phone, email and other contact information. Some of this information is searchable by users of the HR management system and may be shared with individuals who have access to the database and with third parties for the purposes and uses described in this Policy.
- Payroll and Benefits Information such as your bank account details, insurance information, health information, beneficiary and family information, payroll records, hours worked, tax status information, and pension information in order to administer your salary, bonus, incentive plans, family leave pay, sick pay, insurance, and other benefits; and some of this information may be used

for reviewing or making decisions about your working relationship with us, in accordance with applicable law.

- Identity Verification Information such as your name, date of birth, address, maiden name, citizenship, Social Security number or card, passport, driver's license and other forms of identity to in order to administer aspects of your working relationship with us, and to comply with legal obligations or company policies, including preventing corruption and crimes and confirming your legal work status, as applicable.
- Internet or Other Network Activity Information which includes, without limitation:
  - All activity on the Company's information systems, such as internet browsing history, search history, intranet activity, email communications, social media postings, stored documents and emails, usernames and passwords; and
  - All activity on company-issued devices, including phone calls, call logs, voice mails, text messages, chat logs, app use, mobile browsing and search history, mobile email communications, and other information regarding an employee's use of company-issued devices.
- Protected Classifications under the law such as your age, gender, marital status, veteran status, citizenship, race or ethnicity; religious beliefs; sexual orientation; political opinions; trade union membership; health information, including any medical condition, health and sickness records, or injuries; criminal convictions and offenses in accordance with applicable law; disability status; and pregnancy in order to comply with legal obligations or company policies, including record-keeping required by law or company policy; and ensuring meaningful equal opportunity monitoring and reporting.
- Geolocation Data.
- Audio, Electronic, Visual, or Similar Information, including, for example, information collected from cameras, thermometers, and similar devices.
- Sensitive Personal Information including:
  - Social security, driver's license, state identification card, or passport number;
  - Financial account information that allows access to an account, including log-in credentials, financial account numbers, passwords, etc.;
  - Racial or ethnic origin, religious or philosophical beliefs, or union membership;
  - Content of mail, email, and text messages (unless the Company is the intended recipient of the communication);
  - Background check information including criminal record check;
  - Health information; and
  - Information concerning sex life or sexual orientation.
- We may collect other information about you, such as company name, phone number, email address, D&B/DUNS number, and North American Industry Classification System (NAICS) code.
- We collect information from you if you use the Havas travel and expense system, such as receipts, DHS redress number, TSA Pre-Check known traveler number, passport information, international visa, credit card information, travel and lodging preferences, and frequent traveler program numbers and information for facilitating work-related travel and to administer reimbursement for expenses.
- We do not use your sensitive personal information to infer characteristics.
- We may process any other information you provide us in the context of your working relationship with us, or with your application for a working relationship with us in order to administer aspects of this relationship or to comply with legal obligations or company policies.

## **Purposes For Which Personal Information, Including Sensitive Personal Information, Is Used**

- Collecting and processing employment applications, including confirming eligibility for employment, background and related checks, onboarding, and related recruiting efforts.
- Processing payroll, other forms of compensation, and employee benefit plan and program design and administration including enrollment and claims handling and leave of absence administration.
- Maintaining physician records and occupational health programs.
- Maintaining personnel records and record retention requirements.
- Communicating with employees and/or employees' emergency contacts and plan beneficiaries and contacting your household when needed.
- Complying with applicable state and federal health, labor, employment, benefits, workers compensation, disability, equal employment opportunity, workplace safety, and related laws, guidance, or recommendations.
- Preventing unauthorized access to, use, or disclosure/removal of the Company's property, including managing and auditing the Company's information systems, electronic devices, network, and data, as well as mobile phones you register under a Bring Your Own Device policy.
- Ensuring and enhancing employee productivity and adherence to the Company's policies.
- Providing training and development opportunities.
- Performance reviews and exit interviews.
- Investigating complaints, grievances, and suspected violations of Company policy.
- Facilitating the efficient and secure use of the Company's information systems.
- Ensuring compliance with the Company information systems, policies and procedures.
- Improving safety of employees, customers and the public with regard to use of Company property and equipment.
- Improving efficiency, logistics, and supply chain management.
- Improving accuracy of time management systems and attendance, including vacation, sick leave, and other leave of absence monitoring.
- Evaluating and individual's appropriateness for a particular position at the Company, or promotion to a new position.
- Managing customer engagement, development, new business presentations, and other legitimate business purposes.
- Supporting, facilitating, and arranging travel and other logistics for work-related events and functions, including those at Havas offices.
- Responding to and managing legal claims against the Company and/or its personnel, including civil discovery in litigation.
- Facilitating other business administrative functions and strategic activities, such as risk management, information technology and communications, financial management and reporting, workforce and succession planning, networking and social events, merger and acquisition activities, and maintenance of licenses, permits and authorization applicable to Company operations.
- Other purposes disclosed at the time Personal Information is collected.

### **To Whom Havas May Disclose Your Information**

To carry out the purposes outlined above, the Company may disclose personal information to service providers or other third parties. Havas does not sell or share, as those terms are defined under applicable law, the above categories of personal information. The Company may add to the categories of personal information it collects and the purposes for which it uses that information. The Company will provide you with notice in the event it does.

- **We may disclose information within the Havas family of agencies.** This may include parent, affiliate, and/or subsidiary agencies.
- **We may disclose information with vendors that perform services on our behalf.** For example, a software company providing HR administrative services to us.
- **We will disclose information if we think we have to in order to comply with the law or to protect ourselves legally.** For example, we may disclose information to respond to a court order or subpoena. We may share it if a government agency or investigatory body requests.
- **We may disclose information to any successor to all or part of our business.** For example, if part of our agency by whom you are employed is sold, we may give our personal information as part of that transaction.
- **We may disclose information for other reasons that we may describe to you at the time of collection.**

## **Retention**

We retain your personal information for as long as necessary to process your application for employment, process your payroll, administer your benefits and the other purposes described above, and in accordance with the Company's record retention policy. We may retain your personal information for longer if it is necessary to comply with our legal or reporting obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, enforce our legal agreements and policies, address other legitimate business needs, or as permitted or required by applicable law. We may also retain your personal information in a deidentified or aggregated form so that it can no longer be associated with you. To determine the appropriate retention period for your personal information, we consider various factors such as the amount, nature, and sensitivity of your information; the potential risk of unauthorized access, use or disclosure; the purposes for which we collect or process your personal information; and applicable legal requirements. Personal information does not include certain categories of information, such as publicly available information from government records, and deidentified or aggregated consumer information.

## **Disclosure**

To carry out the purposes outlined above, the Company may disclose personal information to service providers or other third parties, such as background check vendors, third-party staffing vendors, information technology vendors, outside legal counsel, and state or federal governmental agencies. The Company does not sell or share, as those terms are defined under applicable law, the above categories of personal information. The Company may add to the categories of personal information it collects and the purposes for which it uses that information. The Company will inform you in the event it does so.

## **California Resident Individual Rights Requests**

Individuals who reside in the State of California have certain individual rights, which are outlined below. Upon receipt of a verifiable request, and as required by applicable law, we will provide a response to such request.

*Right to Know About Personal Information Collected or Disclosed.* As a California resident, you have the right to request additional information, beyond that disclosed above, regarding the following, to the extent applicable:

- the categories of personal information the Company collected from you
- the categories of sources from which that personal information was collected

- the business or commercial purposes for which that information was collected, sold, or shared
- the categories of third parties to whom the information was disclosed
- the specific pieces of personal information collected

*Right To Request Deletion of Your Personal Information.* You have the right to request that we delete the personal information we collected or maintain about you. Once we receive your request, we will let you know what, if any, personal information we can delete from our records, and will direct any service providers and contractors to whom we disclosed your personal information to also delete your personal information from their records.

There may be circumstances where we cannot delete your personal information or direct service providers or contractors to delete your personal information from their records. Such instances include, without limitation, when the information at your issue is maintained: (a) to enable solely internal uses that are reasonably aligned with your expectations based on your relationship with the Company and compatible with the context in which you provided the information, or (b) to comply with a legal obligation.

*Right to Request Correction.* You have the right to request that the Company correct any inaccurate personal information we maintain about you, taking into account the nature of that information and purpose for processing it.

*Right to Limit Use or Disclosure of Sensitive Personal Information.* You have the right, subject to certain exceptions, to request that we limit the use and disclosure of your sensitive personal information, as that term is defined in the CCPA. We do not currently collect or process your sensitive personal information for the purpose of inferring characteristics about you.

*Right to Non-Discrimination for the Exercise of Your Privacy Rights.* We will not discriminate or retaliate against you for exercising any of the rights described above.

*Submitting CCPA Rights Requests.* To submit a CCPA Rights request as outlined above, please use the consumer request web form, available at:

<https://privacyportal-de.onetrust.com/webform/82ba7b7d-abd1-4e2a-80e7-ca5a587402b5/f0c6eff1-8fdf-408f-a07d-addc3ad833dc>

Or contact the Company's Human Resources Department by emailing us at [privacy.na@havas.com](mailto:privacy.na@havas.com). We reserve the right to only respond to verifiable consumer requests to now, delete, or correct that are submitted as instructed.

*Spouses, Dependents, and Associates.* If you have knowledge that the Company collected personal information related to your spouse, dependent or associate, please share a copy of this notice with all such individuals.

## **Information transfers**

Havas N.A. and its subsidiaries are headquartered in the United States and also have offices globally. Therefore, we may transfer your personal information outside the United States to members of our group for the purposes described above.

## **Changes to this Privacy Notice**

We may update this Privacy Notice from time to time. If we do so, we will make an updated copy available on [Agora.Havas.com](http://Agora.Havas.com) or our recruiting website, or by sending you an email. This Privacy Notice does not form part of any contract of employment. Please direct questions about this notice to [privacy.na@havas.com](mailto:privacy.na@havas.com).

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