



PUBLICIS GROUPE

GLOBAL DATA PRIVACY OFFICE

Publicis Groupe TALENT PRIVACY NOTICE

INTRODUCTION

This privacy notice explains what information Publicis Groupe and its subsidiaries (collectively, “Publicis Groupe” and, “we”, “us”, “our” and “agency”) i. collect from you during the application and recruitment process, ii. the purpose of such collection, and iii. what Publicis Groupe does with the collected information. Publicis Groupe SA is located at 133 Avenue des Champs Elysées, 75008 Paris, and is registered in the Paris Commercial Register under number 542 080 601.

Publicis Groupe collects information both directly from you and from your interactions with us; this includes the collection of personal data (“Data”, “Personal Data”). Personal data includes any information that can identify you, either directly, like your name, or indirectly, like your computer’s IP address.

Each entity within the Publicis Groupe is considered an independent controller of your data. The name of the entity responsible for your personal data is provided on each job offer to which you applied.

If you have any questions about the processing of your Personal Data, please contact the Publicis Groupe Chief Data Privacy Officer at privacyofficer@publicisgroupe.com.

1. To whom this Talent Privacy Notice applies?

The Talent Privacy Notice applies to all candidates for jobs, internships or apprenticeship opportunities within Publicis Groupe. We will process your personal data in the following cases:

- The Data is collected directly from you:
 - You applied directly for an open position (“Direct Candidate”)
 - You are an employee of one of the Publicis Groupe agencies (“Employee”)
- The Data is collected indirectly:
 - You have been contacted by a Publicis or external recruiter (“Sourced Candidate”)

All your personal data is stored in our applicant tracking system.

2. What categories of data will be processed?

a) Sourced Candidates and Direct Candidates’ data

Where you are a candidate, we collect the following categories of information directly or indirectly from you, or through the applicant tracking system:

- Your name, first name, preferred pronouns, email address, mobile phone number, password, home address, other contact information.
- Your resume or curriculum vitae, covering letter, portfolio (URL or other relevant website), and/or relevant work experience or other experience, education, transcripts, or other information you



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provide to us in support of your application and the recruitment process including message to the hiring team.

- Any information you provide to us during an interview(s), including but not limited to tests, case studies, presentations, recruitment-related communications, or other exercises completed during the hiring process.
- Details of the type of employment or position you wish to be considered, salary history (where permitted by applicable law), desired salary and other terms related to compensation and benefits packages, willingness to relocate, and other job preferences.
- Your responses to our candidate questions:
 - If you ever worked for a Publicis owned company
 - If you are currently authorized to work in the country in which you are applying to
 - If you require sponsorship for employment visa status
- Details of how you heard about the position.
- Referral and references names and contact information, if applicable, (it is solely your responsibility to obtain consent from the referral or reference before providing their personal information).
- Any specific information obtained during the application or recruitment process, such as gender, information about your citizenship and/or nationality, authorization to work.
- In only specific countries: medical or health information, disability status, veteran status, union status.
- Your social media profile handle(s) if provided by you and needed for the position.
- When you are selected for a position with Publicis: name of the entity you will be employed with, your title, starting salary with Publicis, your start date and if applicable date of the end of your contract.

We may also receive the following categories of information from other sources:

- Where permitted by law and required for the position, background check data, potentially including your criminal history records, and drug test results
- Information concerning your prior employment, including (where permitted by applicable law) compensation and your educational and academic degrees, from employment agencies, and where necessary publicly available sources, social media, former employers, and/or educational institutions
- Information provided by references you provide, referrals, or recruitment agencies
- For the US, information received from publicly available sources

b) Employees' data

Where you are an employee of a Publicis Groupe agency, your complete Marcel profile data is made available within the applicant tracking system via an implemented interface. This takes place irrespective of whether you applied proactively for an open position through Marcel or not.

3. What are the purposes and legal ground for which we process your data?

Your data will be used for following purposes:

Note that legal basis is not relevant for the US.



Purpose	Legal basis
Manage applications and select the relevant candidate	
Use professional social medias (e.g., LinkedIn, Indeed, etc.) to search for and contact you directly.	Legitimate interest
Leverage the networks and recommendations of our employees to identify qualified candidates for open positions within Publicis through our referral program.	Legitimate interest
Offer you a candidate interface where you can apply to multiple job offers and track your recruitment progress.	Execution of pre-contractual measures
Carry out the management of applications which include the reception and processing of your application, the pre-selection of candidates (sorting, recording and filing in our system) and the keeping of records related to the hiring process.	Execution of pre-contractual measures
Evaluate your skills, qualifications and suitability for the position. If applicable, organizing job interviews.	Execution of pre-contractual measures
Where applicable, carrying out background and reference checks, such as validating your professional experiences with former employers.	Execution of pre-contractual measures
Where applicable, verify and document your residence and work permit.	Legal obligation
Where applicable, conduct tests using innovative tools and technologies to assess your skills in relation to the specific job requirements (e.g. tests, video interviews, scoring, etc.). <i>Although your test scores will be automatically calculated, please note that our decisions are not made solely based on automated processes. The test results will always be reviewed by an individual who will determine the next steps in the recruitment process.</i>	Legitimate interest
Where applicable, review possible conflict of interest or non-poaching requirements posed by	Legitimate interest



your application.	
Where applicable, performing administrative tasks such as reimbursing you for interview related expenses.	Execution of pre-contractual measures
Promote employees' profiles within Publicis Groupe	
For Publicis (all agencies) employees: Your Marcel Profile information will be automatically included into our applicant tracking system to support Publicis Groupe staffing needs. This ensures that your Marcel profile will be used to improve internal staffing of unutilized employees that benefits both Publicis and you. Fairness, non-discrimination, and accuracy are considered while matching unstaffed employees with available positions.	Legitimate interest
Operate our applicant tracking system Measure and analyze our recruitment processes	
Manage our application tracking system.	Legitimate interest
Conduct satisfaction surveys following your application process and, if applicable after your job interviews.	Consent
Measure the quality of Publicis' recruitment processes.	Legitimate interest
Conduct data analytics to analyze our applicant pool, aiming to gain insights into the characteristics of candidates applying to positions at Publicis and strategize on attracting and retaining top talent.	Legitimate interest
Using the data for internal purposes, such as: internal research, internal operations, auditing, detecting security incidents, debugging, short-term and transient use, quality control, and legal compliance.	Legitimate interest
We may aggregate, de-identify and/or anonymize any information collected so that such information can no longer be linked to you or your device ("Aggregate/De-Identified Information"). We may use Aggregate/De-Identified Information for any purpose, including without limitation for research and marketing purposes, and may also share such data with any other party, including advertisers, promotional partners, and sponsors, in our discretion, unless otherwise prohibited by applicable law.	Legitimate interest
Organize our employment relationship	



Carry out all administrative steps for your employment contract and employment.	Execution of pre-contractual measures
Maintain communicate and keep you informed	
Reach out to provide updates and notify you of future job opportunities.	Consent

4. Who has access to your data?

- Publicis employees:
 - The hiring team involved in your recruitment (recruiter, hiring managers and any employee involved in the process);
 - Our applicant tracking system administrators;
 - The hiring team in charge of the region or market you applied to.

- External recipients:

We may also share your personal information with the following third parties only to process your application or the recruitment process:

- ICIMS, our applicant tracking service provider;
- External recruitment agencies;
- On rare occasions our clients, if they play a part in the interview process;
- Service providers acting on Publicis Groupe's behalf for verification/background checks;
- Lawyers;
- Authorities where we are legally required or for the defense of Publicis' rights in the context of litigation;
- Any potential buyer in case of subsidiary sell.

5. Use of cookies, other tracking technology and social media plug-ins

We use traffic log cookies to identify which pages of our career site are being used. This helps us analyze data about web page traffic and improve our website in order to tailor it to your needs. We only use this information for aggregated statistical analysis purposes. Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. You can choose to accept or decline some or all Cookies. On your first visit, by clicking the "Cookie Settings" link on the Cookie banner, you will be able to set your preferences according to the type of Cookies. You can change your Cookie preferences at any time using the "Cookie Settings" button in the footer of our website pages.

We provide social media plug-ins to allow you to easily share content from our website and, in doing so, your Personal Data will be disclosed to these social media platforms. When you share content using these buttons, a new page will pop up from the relevant social media platform. If you're already logged into your account on that social media platform, then you will probably be automatically logged into this pop-up page, so that you don't have to log in again. If, however, you are not logged in (or if you are not registered with the social media platform), the page will ask you for your information.

We have no control over how social media platforms use your Personal Data. We encourage you to read the privacy notices on the various social media platforms you use.

Find out more about how these social media platforms use your Personal Data:

- [Facebook](#)



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- [X](#)
- [LinkedIn](#)

6. For how long do we store Your Data?

Regarding the retention of your data, during the application process, you have two options:

Option 1: Provide your data for the recruitment process only; or

Option 2: Consent to be contacted for potential job opportunities for the next two (2) years.

After the recruitment process or 2 years, your data will be stored in a separate archive database in compliance with local regulations and only for **legal or reporting requirements**.

The data of our recruitment tests will be kept for the duration of the recruitment process and in any case no longer than one (1) year.

7. Your rights in connection with information

In certain countries, you have certain rights under data protection laws. This may include the following rights:

- Request access to your information that we hold about you: Anyone can consult all the data relating to them.
- Request correction of the information that we hold about you: Anyone may request that information relating to him or her be corrected, supplemented or updated if errors or inaccuracies are discovered.
- Request erasure (also called deletion) of your personal information: Anyone may request that his or her data be deleted if there are no longer grounds for processing it.
- Object to certain processing of your information: Anyone may object to the processing of his or her data.
- Request to restrict your information: Anyone may ask the data controller to temporarily freeze the use of all or part of his or her data.

To exercise these rights, please use the privacy rights tab within your [candidate space](#). If you wish to reach out to the Publicis Privacy Officer, please use this [form](#).

We will respond to any requests in accordance with applicable law, therefore, there may be circumstances where we will not comply with your request.

Depending on your country of residence, you may also raise questions or concerns with your local data protection authority.

8. Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used, or accessed in an unauthorized way, altered, or disclosed. Most important, we limit access to your personal information to those employees, contractors, and other third parties who have a business need-to-know. They will only process your personal information on our instructions, and they are subject to confidentiality.



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9. Updates to this Notice

Should we wish to change this Notice, if you have already provided personal information, we will contact you to inform you of the new privacy notice, and, in some circumstances, we may need to obtain your consent to the changes.

If you wish to save this text, please mark the entire statement (e.g. with your mouse) and copy-paste by pushing ctrl-c.

10. Questions and Comments

If you have any questions about this privacy notice or how we handle your personal information, please contact the Publicis Groupe Data Privacy Officer at privacyofficer@publicisgroupe.com

This Privacy Notice has been designed to be accessible to people with disabilities. If you experience any difficulties accessing the information here, please contact us at privacyofficer@publicisgroupe.com.

Last modified: 15.10.2024



Annex 1 for US residents

This Annex contains additional information relevant to US residents:

1. Purpose of Data Collection

In addition to the purposes listed in the main body of this Privacy Notice, the following table provides more information about our purposes for collecting your Personal Data and Sensitive Personal Data:

Our Purposes for collecting and using your Personal Data
Your information may be shared in connection with a corporate transaction including for example a merger, investment, acquisition, reorganization, consolidation, bankruptcy, liquidation, or sale of some or all of our assets, or for purposes of due diligence connected with any such transaction
Your information may be shared for legal purposes, such as to: (a) comply with legal process or a regulatory investigation (e.g. regulatory authorities' investigation, subpoena, or court order); (b) enforce our Terms of Service, this Privacy Notice, or other contracts with you, including investigation of potential violations thereof; (c) respond to claims that any content violates the rights of other parties; and/or (d) protect the rights, property or personal safety of us, our platform, our customers, our agents and affiliates, its users and/or the public; and (e) satisfy legal or governmental reporting obligations. Such disclosure may be for a business purpose, but may also be considered a "sale" under certain state privacy laws.
Your information may be shared with auditors and advisors, lawyers, insurance brokers and carriers, and benefit plan administrators, and other third parties as necessary in connection with standard business transactions and proceedings.
In rare circumstances, Publicis Groupe may sometimes be required to disclose your information to law enforcement officials, government authorities, or other third parties we believe such disclosure is required by applicable law, regulation, or in response to legal process.

2. With whom do we disclose your Personal Data or Sensitive Personal Data for a Business Purpose

In addition to those identified in the main body of this Privacy Notice, the table below shows with whom we disclose your Personal Data for the specific business purpose(s).

Category of Personal Data	Categories of Parties with Whom We Disclosed Your Data for a Business	Business Purpose for the Disclosure
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	Purpose	
Contact Information and Identifiers	Service providers that management or administer employment related tools or systems	Conducting, administering, and managing employment related activities.
Recruitment Information	Service providers that management or administer employment related tools or systems and past, current, or future clients for employment related matters	Evaluating and retaining qualified candidates for open positions
General Employment Information	Service providers that management or administer employment related tools or systems and past, current, or future clients for employment related matters	Evaluating and retaining qualified candidates for open positions
Internet or other electronic network activity information	Service providers that management or administer employment related tools or systems	Helping to ensure system security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for these purposes and debugging to identify and repair errors that impair existing intended functionality.
Veteran Status	Service providers that management or administer employment related tools or systems	Conducting, administering, and managing employment related activities.
Health Information	Service providers that management or administer employment related tools or systems	Conducting, administering, and managing employment related activities.
Union Status	Service providers that management or administer employment related tools or systems	Conducting, administering, and managing employment related activities.
Citizenship and Immigration Data	Service providers that management or administer employment related tools or systems	Administering and managing payroll and other employment related services and any associated legal compliance.
Inferences	Service providers that management or administer employment related tools or systems	Conducting, administering, and retaining employment related activities.



3. Your Rights and Choices

If you reside in certain states in the United States, such as California, you may have specific rights related to your Personal Data. This section describes how to exercise those rights and our process for handling those requests.

- Right to request access to your Personal Data

You may request access to your Personal Data that we collect, use, or disclose. In particular, you may request:

- the specific pieces of Personal Data that we process about you the categories of Personal Data we have collected about you;
- the categories of sources from which the Personal Data was collected;
- the categories of Personal Data about you we disclosed for a business purpose or sold or shared;
- the categories of third parties to whom the Personal Data was disclosed for a business purpose or sold or shared; and
- the business or commercial purpose for processing the Personal Data.

When exercising the right to access Personal Data, you have the right to obtain materials in a portable and, to the extent technically feasible, readily usable format that allows You to transmit the data to another entity without hindrance. When we receive and verify your request to access your Personal Data, we will make best efforts to fulfill your request unless an exception applies. You are permitted 2 access reports every 12 months.

- Right to request deletion of your Personal Data

You may also request that we delete any Personal Data that we obtained about you. However, we may retain Personal Data for certain important purposes, as set out by applicable law. When we receive and verify your request to delete your Personal Data, we will proceed to delete the data unless an exception applies. We will retain a record of your deletion request in order to keep your Personal Data deleted, unless and until you provide consent for the processing of your Personal Data post your deletion request.

- Right to correct your Personal Data

If you believe we hold inaccurate personal information about you, you may request that we correct that information. We may ask for documentation showing that the information you submit is accurate and the Personal Data we hold is inaccurate. Once we receive your request, we will verify your identity and taking into account the type of personal information and the purposes of our holding that personal information we will make best efforts to complete your request. We may deny your request if we determine that the contested Personal Data is more likely than not accurate. Additionally, we may choose to delete your Personal Data in response to your request to correct your Personal Data if the deletion of your Personal Data would not negatively impact you.



- Right to limit the use and disclosure of your sensitive personal information

You may request that we limit the use and disclosure of your Sensitive Personal Data. However, we may deny your request in part or in full under uses authorized by applicable law.

- Right to nondiscrimination

We will not deny, charge different prices for, or provide a different level of quality of goods or services if you choose to exercise your privacy rights.

- Right to opt-out of the sale of your Personal Data or the sharing of your data for cross-contextual behavioral advertising

We do not sell or share any Personal Data as those terms are used in US state privacy laws like the California Consumer Privacy Act.

How to exercise your US state privacy rights

US residents may exercise their applicable privacy rights by using the privacy rights tab within their candidate space or by contacting us at 1-833-983-0087.

For security purposes (and as required under US state laws), we will verify your identity – in part by requesting certain information from you – when you make a request to access, correct, or delete, your Personal Data. The verification process will utilize an email verification process, a telephone number verification process, and, if applicable, a request for your employee ID number.

If we are unable to complete your request fully for any reason, we will provide you additional information about the reasons why we could not comply with your request.

You may also designate an agent to make requests to exercise your rights under certain US state laws. We will take steps both to verify your identity and to verify that your agent has been authorized to make a request on your behalf by requesting your agent to provide us with a signed written authorization or a copy of a power of attorney executed by you.



ANNEX 2: COOKIE POLICY

The purpose of this Notice is to inform you about the collection and use of Cookies when browsing our career sites.

By clicking on the “Accept” button on the Cookie banner, you agree to the use of Cookies on your browser. You may revoke your consent at any time by changing your Cookie preferences as set out below.

I. What are cookies?

A cookie is a small file, which is placed on your computer's hard drive. If you choose to accept cookies, the file is added, and the cookie helps analyze web traffic or lets you know when you visit a particular website. In general, cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

Depending on the type and settings of your browser, cookies may be accepted by default. You may change the settings of your browser to delete existing cookies or prevent future cookies from being automatically accepted. If you disable cookies, certain parts and functions of our website may not be available.

II. Our website uses the following types of cookies

- **Strictly Necessary Cookies:** These cookies are necessary for the website to function and cannot be switched off in our systems. Some of these cookies are only set in response to requests made by you, such as setting your preferences, logging in or filling out forms. They may also be set for certain security purposes and network management. You can manage these types of cookies using your browser settings, but it may affect your ability to use our website.

Cookies used:

- JSESSIONID

Description: General purpose platform session cookie, used by sites written in JSP. Usually used to maintain an anonymous user session by the server.

Cookie Duration: 1 year

- cookie_icims_iframe_content_height

Cookie Duration: 1 year

- **Targeting Cookies:** These cookies are used to collect information about your browser, device and website visit and use such formation to provide you with personalised experiences and advertising on this website and others across the internet. If these cookies are disabled, your data will not be shared with third parties for this purpose.

Cookies used:



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- aws-waf-token

Description: Used to attribute commission to affiliates when you arrive at the website from an affiliate referral link. It is set when you click on one of your links and used to let the advertiser and us know the website from which you came.

Cookie Duration: 3 days

You can choose to accept or decline some or all Cookies. On your first visit, by clicking the “Cookie Settings” link on the Cookie banner, you will be able to set your preferences according to the type of Cookies. You can change your Cookie preferences at any time using the “Cookie Settings” button in the footer of our website pages.

Different retention periods apply to the different types of cookies according to whether they are session cookies (i.e. a cookie temporarily placed on your device that appears when you access the website and disappears when you close your browser window) or permanent cookies (that is a cookie that will remain on your device for a certain period to allow us to remember your preferences on your next visits). In any case, cookies will never be kept for more than 13 months on your device.

III. How you can manage cookies?

When browsing the Website for the first time, you may click the button “Cookies Settings” on the Cookie banner in order to manage your Cookie preferences. At any time, you will be able to adjust your preferences in the Cookie Settings button in the footer of our website pages.

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