



**PUBLICIS GROUPE - PRIVACY NOTICE
APPLICANT TRACKING SYSTEM**

INTRODUCTION

This privacy notice (hereinafter the “Notice”) explains what information Publicis Groupe and its affiliates/subsidiaries (collectively, “Publicis Groupe” and, “we”, “us” and “our”) collect during their application and recruitment process, the purposes of collection of such information and how Publicis Groupe uses discloses, or otherwise processes that information.

The Agencies of Publicis Groupe and Publicis Groupe SA, 133 Avenue des Champs Elysées, 75008 Paris are regarded as co-controllers.

Our applicant tracking system processes your data in the following cases:

- You applied directly for an open position (“Direct Candidate”)
- You have been approached by a Publicis recruiter (“Sourced Candidate”)
- You are an employee of one of the Publicis Groupe agencies (“Employee”)

1. What categories of data will be processed?

a) 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, address, email address, telephone number, and other contact information
- Your resume or curriculum vitae, covering letter, portfolio, and/or relevant work experience or other experience, education, transcripts, or other information you provide to us in support of your application and the recruitment process
- Any information you provide to us during an interview(s), including but not limited to tests, case studies, presentations, 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
- 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, medical or health information, disability status, veteran status, authorization to work
- Your social media profile handle(s) if provided by you and needed for the position

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



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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

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 irrespectively of whether you applied proactively for an open position through Marcel or not.

2. What are the purposes for which we process your data?

a) Candidates

Your information will be used for the following purposes:

- Processing your application
- Assessing your skills, qualifications, and suitability for the position
- Carrying out background and reference checks, where applicable
- Carrying out the management of applications and in particular keeping records related to the hiring process
- Communicating with you about the recruitment process and your application, including informing you of potential career opportunities
- Reaching out directly to skilled worker candidates
- Complying with applicable legal or regulatory requirements
- Improving our recruitment or application process
- Proactively conducting research about your educational and professional background and skills and contacting you if we think you would be suitable for a role with us
- *Where appropriate consent was obtained:* Regularly informing individuals about the latest company news

b) Employees

The employees' Marcel Profile information will be automatically included in our applicant tracking system to support the Publicis Groupe staffing needs. This means 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 open positions.

3. What legal ground(s) do we rely on?

- a) **When we directly contact you:** The use of your personal data relies on our legitimate interest to hire new employees to meet the company growth, to fill open positions, and to win new competencies. By reaching out directly to the candidate, we pursue our legitimate interest to approach the best possible candidates.



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- b) **When you apply through a job offer:** The use of your personal data relies on your explicit consent that we obtain before you submit your application.
- c) **When you apply through our chatbot:** The use of your personal data relies on your explicit consent that we obtain before you start the application process through our Chatbot.
- d) **When you apply proactively through Marcel:** The use of your personal data relies on your explicit consent that we obtain before you submit your application.
- e) **When you are an employee of an agency of Publicis Groupe:** Your personal data is available within the applicant tracking system. We rely on our legitimate interest to match unstaffed employees with open positions which benefit both Publicis and current employees.

The legal basis we rely on for processing sensitive information is our obligations in employment and safeguarding your fundamental rights.

4. Who has access to your data?

- Your information may be shared between the Agencies of Publicis Groupe about the purposes described above.
- We may also share your personal information with the following third parties only to process your application or the recruitment process:
 - SmartRecruiters, our applicant tracking service provider
 - External recruitment company, namely when an Agency is working with such company when recruiting
 - 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.

Applicable for the US only:

- Your information may be shared in connection, or during negotiation of, any merger, sale of Publicis Groupe assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or into another company.
- 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.
- If you live outside the United States, including in the European Economic Area, we may transfer your information based on [Standard Contractual Clauses](#).

5. For how long do we store Your Data?

Our recruiting tool allows you to use your data for different job openings within all Agencies of the Publicis Groupe. Depending on the location of the relevant job opening, different retention requirements may apply as per the respective laws:



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- If you applied at an agency located within the EU, the retention period regarding your data supporting recruitment, application, and sifting is (in accordance with the GDPR) two (2) years.
- Where retention requirements from countries outside the EU apply or where we keep your data for legal, accounting, or reporting requirements, the retention period will change accordingly.

6. Your rights in connection with information

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

- Request access to your information
- Request correction of the information that we hold about you
- Request erasure (also called deletion) of your personal information
- Object to certain processing of your information
- Request to restrict your information

To exercise these rights, please contact privacyofficer@publicisgroupe.com. 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.

7. If you apply to Publicis Sapient through our Chatbot

During the application process via our Chatbot, you might be asked eligibility questions. These are used to successfully evaluate your application. Once you have answered all questions, your responses will be evaluated. Depending on the outcome of the evaluation, you will either be invited to move forward with the post-application process or the Chatbot will automatically decline your application if you don't meet the eligibility criteria.

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, agents, 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.

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



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GLOBAL DATA PRIVACY OFFICE

Version 1.0

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

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