



Interpublic Data Protection Client Pack (September 2025)

How Interpublic agencies handle personal data for our Clients

Our Clients, as data controllers, and Interpublic agencies (“we” or “agency”), as an appointed data processor, have obligations under data protection laws to which each are subject (‘Data Protection Laws’). This document explains how we handle personal data on your behalf and sets out useful information about how we support you as your appointed processor.

Security Measures, Confidentiality and Compliance

- We have appropriate security measures in place when handling personal data, and
- our employees fully understand and maintain the confidentiality of that personal data - only authorised account handlers will be permitted to handle each Client’s personal data

We maintain up-to-date summaries of:

1. the security measures we apply to personal data
2. our data protection compliance, governance and training activities, and
3. key features of the data processing operations our agency carries out for Clients

We provide these summaries to you when we are engaged to process personal data for you for the first time and periodically thereafter so that you are aware of our practices.

Your instructions

We typically agree detailed services for Clients before personal data processing begins – usually in a statement of work (SOW) or otherwise in writing – and identify any personal data processing to be undertaken. We will only use personal data as approved by you and in accordance with the law. If we think there is an issue with any instruction at any time, we will let you know.

What we will expect of you

As the data controller, Data Protection Laws require you to have established lawful grounds for us to process the data in accordance with your instructions. For example, where you are asking us to engage with individuals on your behalf and acquire their data for your marketing or other purposes, Data Protection Laws require data controllers to provide the content of any privacy disclosure(s), including the method to obtain any necessary consents from those individuals.

Transparency

We understand it is necessary for data controllers to provide individuals with clear and unambiguous explanations



of the use of personal data to establish a lawful basis. To assist Clients where we facilitate the processing of personal data on your behalf or via Sub-processors, we endeavour to provide explanations of use cases or summaries of data processing so that you, as data controller, know what and how personal data may be used for personal data processing and can fulfill your transparency obligations.

Sub-processing

Sub-processing within Interpublic agencies: We may sometimes ask you for your consent to share or transfer personal data to other Interpublic agencies. We are part of a global network with operations around the world. To help us provide the best service to you, we sometimes work with other agencies within Interpublic. Interpublic agencies are expected to handle personal data to the same standards and personal data is processed in accordance with your instructions and applicable Data Protection Laws.

Outside of Interpublic: Outside of Interpublic, we will obtain your consent before appointing an external Sub-processor – save as set out below.

Media Services: A significant area where pre-notification of all Sub-processors is difficult – if not impossible – is for certain online advertising/media services. This is because – for these services – Sub-processors are appointed following a successful real-time bid for advertising space on a publisher's website and the advertisement is then published immediately after that successful bid. Given the split-second speed of this process and, obviously, being unable to predict the outcome of the bidding process, it is impossible for Clients to be given advance notice of the identity of the ultimate publishers and data processors. So, where advance identification of processors or Sub-processors is problematic, we will endeavour to provide clear explanations of how such services operate. In this way, you, as the data controller, can fully understand what and how personal data may be acquired or used by Sub-processors when we are delivering those services.

Processors/Sub-processors with Non-Negotiable Terms: Some third-party processors/Sub-processors will only provide their services under non-negotiable contractual terms – we call these third parties Fixed Term Vendors or FTVs. And often these FTVs are critical to the provision of certain advertising services, for example, Google and Meta for online advertising/media services. Where an FTV is proposed to provide services, we will provide you with their details and contractual terms. Unless you object, their appointment and terms of business will be deemed approved and accepted by you, and our liability and obligations will be limited to and not exceed those of the FTV in respect of the data processing carried out by them for you.

Transfers outside the EEA/UK/Switzerland

International personal data transfers may be in scope where authorised by you. In the absence of an applicable adequacy decision, we will not transfer personal data outside of the EEA, UK or Switzerland unless an adequate level of protection is provided through the applicable Model Clauses or an equivalent approved safeguard. We will pass on this requirement, and all other data protection requirements, to any Sub-processors we may appoint to provide services to you.

Your obligations and our help

As a data controller, you have a range of obligations including: to respond to data subjects' requests; adhering to strict reporting requirements in the event of a data breach; establishing when a data processing impact assessment (DPIA) is needed and carrying out DPIAs. We, as your processors, will assist you, where applicable, to support data subject rights requests at your direction (e.g., delete, update, provide a copy of personal data,



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etc.); react promptly in the event of a breach including to keep you informed; provide information about how we process personal data on your behalf in support of your completion of a DPIA or our compliance with our data protection obligations.



IPG Agencies Security Technical and Organisational Measures

1. Physical access control

Technical and organisational measures to prevent unauthorised persons from gaining access to the data processing systems available in premises and facilities (including databases, application servers and related hardware) where personal data are processed, include:

- Establishing security areas, restriction of access paths
- Establishing access authorisations for employees and third parties
- Access control system (ID reader, magnetic card, chip card)
- Key management, card-key procedures
- Door locking (electric door openers, etc.)
- Security staff, janitors
- Surveillance facilities, video/CCTV monitor, alarm system
- Securing authorised data processing equipment and personal computers

2. Virtual access control

Technical and organisational measures to prevent data processing systems from being used by unauthorized persons include:

- User identification and authentication procedures
- ID/password security procedures (special characters, minimum length, change of password)
- Automatic blocking (e.g., password or timeout)
- Monitoring of break-in-attempts and automatic turn-off of the user ID upon several erroneous password attempts
- Creation of one master record per user, user master data procedures, per data processing environment
- Encryption of archived data media

3. Data access control

Technical and organisational measures to ensure that persons entitled to use a data processing system gain access only to such personal data in accordance with their access rights, and that personal data cannot be read, copied, modified or deleted without authorisation, include:

- Internal policies and procedures
- Control authorisation schemes
- Differentiated access rights (profiles, roles, transactions and objects)
- Monitoring and logging of accesses
- Disciplinary action against employees who access personal data without authorisation
- Reports of access
- Access procedure
- Change procedure
- Deletion procedure
- Encryption

4. Disclosure control

Technical and organisational measures to ensure that personal data cannot be read, copied, modified or deleted without authorisation during electronic transmission, transport or storage on storage media (manual or electronic), and that it can be verified to which companies or other legal entities personal data are disclosed, include:

- Encryption/tunnelling
- Logging
- Transport security

5. Control of instructions

Technical and organisational measures to ensure that personal data are processed solely in accordance with the instructions of the Controller include:

- Unambiguous wording of the contract
- Formal commissioning (request form or SOW)
- Criteria for selecting any Sub-processor

6. Availability control

Technical and organisational measures to ensure that personal data are protected against accidental destruction or loss (physical/logical) include:



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- Backup procedures
- Mirroring of hard disks (e.g., RAID technology)
- Uninterruptible power supply (UPS)
- Remote storage
- Anti-virus/firewall systems
- Disaster recovery plan

7. Separation control

Technical and organisational measures to ensure that personal data collected for different purposes can be processed separately include:

- Separation of databases
- “Internal client” concept/limitation of use
- Segregation of functions (production/testing)
- Procedures for storage, amendment, deletion, transmission of data for different purposes



What we are doing to comply with Data Protection Law

At all Interpublic agencies, the privacy and security of our Clients' personal data is incredibly important. This document explains what we do to protect personal data and how we help Clients meet their data protection obligations.

1. IPG's Global Privacy Team

IPG's Global Privacy & Data Protection team are available for questions and support: privacy@interpublic.com

Contact information for EU/UK GDPR Data Protection Officer ("DPO"):

Email	UK GDPR DPO: uk.dpo@interpublic.com EU GDPR DPO: gdpr.dpo@interpublic.com
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2. Our Data Protection Governance Structure

Interpublic has established a network of Data Protection Champions, Leads, and Project Managers ("Champions") throughout the EU, UK and Switzerland. This network helps drive the implementation and maintenance of Interpublic's Data Protection compliance programme by:

- facilitating the awareness of data-focused policies and practices amongst our staff
- acting as a contact point on data protection matters, and
- exchanging information and experiences on data protection matters and compliance

3. Our Compliance Programme

A central objective of our compliance programme has been to ensure all Interpublic agencies provide processing services to our Clients with data protection in mind. In the regular course of business, we have:

1. Documented our security practices: see **Our Security Technical and Organisational Measures**
2. Set up in-agency GDPR governance structure comprising GDPR Champions (as described above)
3. Implemented an ongoing training and awareness raising programme, to ensure all staff, regardless of their specific role, are aware of basic data protection requirements as they relate to our agencies and to reinforce the need to follow agency-approved data handling processes
4. Appointed a DPO (see above)
5. Documented key data processing operations our agencies carry out for Clients: see **Our Data Processing Operations – Key Features**
6. Carried out DPIAs in key areas of our business
7. Adapted our established processes for data breach notification to comply with the Data Protection Laws



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8. Interpublic developed and maintains a Third-Party Risk Management ('TPRM') process to conduct risk-based vendor diligence, which assesses vendors to ensure they have proper privacy and data protection controls

4. Our Training Programme

An extensive training and education programme is delivered throughout all our agencies.

All-staff training: All staff are required to complete data protection training annually. Training covers practical guidance on the application of Data Protection Laws in day-to-day work, using examples of situations where handling of personal data is involved.

Internal communications: Awareness-raising is supported through regular communications and updates through our Champions network to ensure data protection is always front of mind and aligned with our privacy by design culture.

Training and support for GDPR Champions: Interpublic hosts an annual GDPR Champions Forum for our UK, EU and Swiss Champions, covering key data protection themes and case studies in a practical and open setting.

Specialist training: Specific in-house training programmes give in-depth training on key areas such as consent, profiling, and programmatic media.

Interpublic Personal Information Handling Rules (the 'Rules'): IPG maintains a comprehensive guide for Interpublic agencies covering all aspects of personal data handling including requirements around transfer, storage, and security of personal data. The Rules are trained on and socialized periodically with employees.



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Interpublic Agencies Data Processing Operations – Key Features

This document outlines the key features of the data processing activities undertaken as part of our Advertising Services. The document is divided into our Advertising Services and our Specialist Services for Pharmaceutical & Medical and Media.

I. Advertising Services:

1. Competitions
2. Customer Relationship/Database Management
3. Direct Marketing
4. Client Employee Engagement
5. Events Administration
6. Experiential (Brand Experiences for Consumers, or Creative PR Stunts)
7. Hospitality Management
8. Lobbying
9. Public Relations
10. Research & Insights: Qualitative Research
11. Research & Insights: Quantitative Research
12. Research & Insights: Listening Services
13. Social Media Management & Maintenance
14. Talent Management
15. Technology Development (Apps, Websites, etc.)

II. Specialist Services – Pharmaceutical & Medical:

16. External Expert Engagement
17. Market Research (Interviews/Surveys/Insight/Consultancy)
18. Meetings & Events
19. Publications (Medical Context)
20. Technology Development (Apps, Websites, etc.)

III. Specialist Services – Media:

21. Programmatic Media Buying
22. Publisher Direct Media Buying (Non-programmatic)



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23. Paid Search Media Buying

24. Paid Social Media Buying

25. Custom Audience Creation & Activation for Targeted Digital Media Buying

26. Lead Generation

27. Advertising Operations



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I. Advertising Services

1. Competitions	
Creation, promotion, management of and prize fulfilment for client competitions.	
PURPOSE OF PROCESSING	To create, promote, manage, and fulfil prizes for competitions for a client to promote products, gain consumer insights and engage with potential customers.
CATEGORIES OF DATA SUBJECT	Client customers, prospective customers, or consumers. Industry Experts, Talent, or Client Brand Ambassadors.
CATEGORIES OF PERSONAL DATA	Name, personal or business contact details (including address, telephone and mobile numbers and email address), age, gender, physical characteristics, preferences. Social media account name. Identification documents (e.g., Passport). Special categories: Only where necessary to provide the service(s) and as required and authorised by Client (e.g., dietary or accessibility requirements).
PROCESSING OPERATION	Collect personal data of competition entrants. Use personal data for prize fulfilment, hospitality and/or to make payment to Talent. Use personal data to provide competitions and marketing communications.
DURATION OF PROCESSING	The Personal Data will be processed by the Agency in accordance with Client instructions, for the duration of the Agreement, Services, or part thereof or in accordance with applicable law.
SUB- PROCESSORS	Marketing communications platforms, hosting and events platforms, audience engagement platforms, social media platforms, fulfilment companies, hospitality, and events vendors.
INTERNATIONAL TRANSFERS	International data transfers may be in scope as authorised by Client. In the absence of an applicable adequacy decision, Agency and its Sub-processors primarily rely on the use of approved European Commission Standard Contractual Clauses (SCCs) (or equivalent UK Addendum or Swiss adoption) as their principal safeguard for international transfers out of the EU, UK, or Switzerland, respectively.



2. Customer Relationship/Database Management

Creation, management, or access of a database of potential/actual client customers and information about them, including related services such as call centre management.

PURPOSE OF PROCESSING	To create, manage or process database(s) of potential/actual client customers to better understand consumers, provide tailored, effective marketing communications, and deliver more effective customer service.
CATEGORIES OF DATA SUBJECT	Individuals, Client customers, potential Client customers.
CATEGORIES OF PERSONAL DATA	Name, personal or business contact details (including address, telephone and mobile numbers and email address), age, gender, IP address, location information, device information, website or app behavior, purchase history, warranty registrations, customer service interactions. Special categories: Only where necessary to provide the service(s) and as required and authorised by Client (e.g., dietary or accessibility requirements).
PROCESSING OPERATION	Manage client CRM to inform on current customer base and future strategic planning.
DURATION OF PROCESSING	The Personal Data will be processed by the Agency in accordance with Client instructions, for the duration of the Agreement, Services, or part thereof or in accordance with applicable law.
SUB- PROCESSORS	CRM database platforms such as Salesforce, MS Dynamics.
INTERNATIONAL TRANSFERS	International data transfers may be in scope as authorised by Client. In the absence of an applicable adequacy decision, Agency and its Sub-processors primarily rely on the use of approved European Commission Standard Contractual Clauses (SCCs) (or equivalent UK Addendum or Swiss adoption) as their principal safeguard for international transfers out of the EU, UK, or Switzerland, respectively.



3. Direct Marketing The execution of digital or offline marketing campaigns to win and retain new customers.	
PURPOSE OF PROCESSING	To plan and optimize digital and offline marketing campaigns.
CATEGORIES OF DATA SUBJECT	Individuals, Client customers, potential Client customers.
CATEGORIES OF PERSONAL DATA	Name, personal or business contact details (including address, telephone and mobile numbers and email address), date of birth, job title, employer details, business contact details, marketing preferences, images, videos, etc. Special categories: Only where necessary to provide the services and as required and authorised by Client. (e.g., dietary or accessibility requirements).
PROCESSING OPERATION	Use contact details, creative and content to deploy marketing communications via marketing communications tools or third-party vendors.
DURATION OF PROCESSING	The Personal Data will be processed by the Agency in accordance with Client instructions, for the duration of the Agreement, Services, or part thereof or in accordance with applicable law.
SUB- PROCESSORS	Madison Logic, Acquisition Inc., SWZD, Intentsify, Future plc, Demand Science, Tech Target, Inbox Insight, Headley Media, MRP.
INTERNATIONAL TRANSFERS	International data transfers may be in scope as authorised by Client. In the absence of an applicable adequacy decision, Agency and its Sub-processors primarily rely on the use of approved European Commission Standard Contractual Clauses (SCCs) (or equivalent UK Addendum or Swiss adoption) as their principal safeguard for international transfers out of the EU, UK, or Switzerland, respectively.



4. Client Employee Engagement Planning, administration and organisation of communications and events for client's employees and prospective employees.	
PURPOSE OF PROCESSING	To provide Client employee engagement information and events to Client employees or prospective employees.
CATEGORIES OF DATA SUBJECT	Client employees or prospective employees.
CATEGORIES OF PERSONAL DATA	Name, personal or business contact details (including address, telephone and mobile numbers and email address), job title, age, gender, image or avatar, location data, interests, personal opinions and record of engagement in event or deliverable. Special categories: Only where necessary to provide the service(s) and as required and authorised by Client (e.g., dietary or accessibility requirements).
PROCESSING OPERATION	Use contact details to provide employee or prospective employee engagement communications and events.
DURATION OF PROCESSING	The Personal Data will be processed by the Agency in accordance with Client instructions, for the duration of the Agreement, Services, or part thereof or in accordance with applicable law.
SUB- PROCESSORS	Survey providers and events suppliers.
INTERNATIONAL TRANSFERS	International data transfers may be in scope as authorised by Client. In the absence of an applicable adequacy decision, Agency and its Sub-processors primarily rely on the use of approved European Commission Standard Contractual Clauses (SCCs) (or equivalent UK Addendum or Swiss adoption) as their principal safeguard for international transfers out of the EU, UK, or Switzerland, respectively.



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5. Events Administration Planning, administration, and organisation of events for our clients.	
PURPOSE OF PROCESSING	To facilitate event planning and management including delivering event and marketing communications.
CATEGORIES OF DATA SUBJECT	Event attendees or prospective attendees, including journalists, Client customers or prospective customers, industry specialists, Talent and Client brand ambassadors, individuals participating in promotional activities, and catering and support staff.
CATEGORIES OF PERSONAL DATA	Name, personal or business contact details (including address, telephone and mobile numbers and email address), job title, age, gender. Records of attendance and engagement in events. Special categories: Only where necessary to provide the service(s) and as required and authorised by Client (e.g., dietary or accessibility requirements).
PROCESSING OPERATION	Collect personal data for or at events. Use personal data to provide event information, marketing communications, and manage the event. Report to Client on event outcomes.
DURATION OF PROCESSING	The Personal Data will be processed by the Agency in accordance with Client instructions, for the duration of the Agreement, Services, or part thereof or in accordance with applicable law.
SUB- PROCESSORS	Caterers, event spaces, hotels, transportation providers, virtual/connectivity partners, Talent and event contributors, registration platforms, guest management apps (e.g., Cvent), etc.
INTERNATIONAL TRANSFERS	International data transfers may be in scope as authorised by Client. In the absence of an applicable adequacy decision, Agency and its Sub-processors primarily rely on the use of approved European Commission Standard Contractual Clauses (SCCs) (or equivalent UK Addendum or Swiss adoption) as their principal safeguard for international transfers out of the EU, UK, or Switzerland, respectively.



6. Experiential (Brand Experiences for Consumers, or Creative PR Stunts) Conceptualising and executing engaging experiences.	
PURPOSE OF PROCESSING	Brand experiences or creative public relations stunts for consumers.
CATEGORIES OF DATA SUBJECT	Client customers, potential Client customers, Talent, industry experts, and consumers who engage with the event.
CATEGORIES OF PERSONAL DATA	Name, personal or business contact details (including address, telephone and mobile numbers and email address), job title, age, date of birth, gender, IP address, location data, images, video, interests, lifestyle information and preferences. Special categories: Only where necessary to provide the service(s) and as required and authorised by Client (e.g., dietary or accessibility requirements).
PROCESSING OPERATION	Use personal data to provide experience (e.g., send an attendee their photobooth images from an event), event information and marketing communications. Use location data to deliver location-based messages and information, where applicable.
DURATION OF PROCESSING	The Personal Data will be processed by the Agency in accordance with Client instructions, for the duration of the Agreement, Services, or part thereof or in accordance with applicable law.
SUB- PROCESSORS	Caterers, event spaces, hotels, transportation providers, virtual/connectivity partners, Talent and event contributors, registration platforms, guest management apps (e.g., Cvent) etc.
INTERNATIONAL TRANSFERS	International data transfers may be in scope as authorised by Client. In the absence of an applicable adequacy decision, Agency and its Sub-processors primarily rely on the use of approved European Commission Standard Contractual Clauses (SCCs) (or equivalent UK Addendum or Swiss adoption) as their principal safeguard for international transfers out of the EU, UK, or Switzerland, respectively.



7. Hospitality Management Managing hospitality requirements for client events.	
PURPOSE OF PROCESSING	To manage hospitality needs for events and provide information to data subjects on behalf of the Client.
CATEGORIES OF DATA SUBJECT	Consumers/individuals attending Client events or participating in promotional activities. Talent and Client brand ambassadors.
CATEGORIES OF PERSONAL DATA	Name, personal or business contact details (including address, telephone and mobile numbers and email address), job title, age, date of birth, gender, interests, lifestyle information, preference and feedback and insights. Special categories: Only where necessary to provide the service(s) and as required and authorised by Client (e.g., dietary or accessibility requirements).
PROCESSING OPERATION	Use contact details to provide communications relating to events or hospitality, i.e., travel and accommodation. Where required, process payment information for the sale of client products or services. Where required, collect and analyse attendee feedback and insights.
DURATION OF PROCESSING	The Personal Data will be processed by the Agency in accordance with Client instructions, for the duration of the Agreement, Services, or part thereof or in accordance with applicable law.
SUB- PROCESSORS	Caterers, event spaces, hotels, transportation providers, virtual/connectivity partners, Talent and event contributors, registration platforms, guest management apps (e.g., Cvent) etc.
INTERNATIONAL TRANSFERS	International data transfers may be in scope as authorised by Client. In the absence of an applicable adequacy decision, Agency and its Sub-processors primarily rely on the use of approved European Commission Standard Contractual Clauses (SCCs) (or equivalent UK Addendum or Swiss adoption) as their principal safeguard for international transfers out of the EU, UK, or Switzerland, respectively.



8. Lobbying Advocating Client positions to political decision-makers as well as others involved in the political decision-making process through information.	
PURPOSE OF PROCESSING	To engage with officials and public figures to inform and advocate on behalf of the Client.
CATEGORIES OF DATA SUBJECT	Individuals who influence government decisions or public figures.
CATEGORIES OF PERSONAL DATA	Name, personal or business contact details (including address, telephone and mobile numbers and email address), job title, age, gender, nationality, images, video and voice recordings, qualifications, memberships, location data, interests, lifestyle information, preferences, opinions and feedback and insights. Special categories: Only where necessary to provide the service(s) and as required and authorised by Client (e.g., dietary or accessibility requirements).
PROCESSING OPERATION	Using contact details to engage with government officials and public figures. Using place of work, job title and personal preferences to identify areas of public interest, influence, or exposure.
DURATION OF PROCESSING	The Personal Data will be processed by the Agency in accordance with Client instructions, for the duration of the Agreement, Services, or part thereof or in accordance with applicable law.
SUB- PROCESSORS	Social listening companies (e.g., BrandWatch, TalkWalker).
INTERNATIONAL TRANSFERS	International data transfers may be in scope as authorised by Client. In the absence of an applicable adequacy decision, Agency and its Sub-processors primarily rely on the use of approved European Commission Standard Contractual Clauses (SCCs) (or equivalent UK Addendum or Swiss adoption) as their principal safeguard for international transfers out of the EU, UK, or Switzerland, respectively.



9. Public Relations Develop strategic communications on behalf of Client to the public to maintain and cultivate a positive public image and/or respond to public discourse.	
PURPOSE OF PROCESSING	Develop strategic communication on behalf of Client to the public to maintain and cultivate a positive public image and/or respond to public discourse.
CATEGORIES OF DATA SUBJECT	Journalists, experts, members of the public or influencers.
CATEGORIES OF PERSONAL DATA	Name, personal or business contact details (including address, telephone and mobile numbers and email address), job title, qualifications, age, gender, social media account name, image, voice recording, video, preferences, and interests. Special categories: Only where necessary to provide the service(s) and as required and authorised by Client (e.g., dietary or accessibility requirements).
PROCESSING OPERATION	Use contact details to engage with journalists and influencers. Use place of work, job title and personal preferences to identify areas of public influence or exposure.
DURATION OF PROCESSING	The Personal Data will be processed by the Agency in accordance with Client instructions, for the duration of the Agreement, Services, or part thereof or in accordance with applicable law.
SUB- PROCESSORS	Talent or influencer agents, think tanks, political action groups, or unions, etc.
INTERNATIONAL TRANSFERS	International data transfers may be in scope as authorised by Client. In the absence of an applicable adequacy decision, Agency and its Sub-processors primarily rely on the use of approved European Commission Standard Contractual Clauses (SCCs) (or equivalent UK Addendum or Swiss adoption) as their principal safeguard for international transfers out of the EU, UK, or Switzerland, respectively.



10. Research & Insights: Qualitative Research Recruiting research participants and conducting interviews/focus groups to obtain opinions or insights via discussion or observation, as well as generating reports and analysis.	
PURPOSE OF PROCESSING	To facilitate the sourcing and engagement of individuals for evaluation and selection to participate in interviews/focus groups. To arrange and/or conduct interviews/focus groups with selected research participants to gain insights from their responses. To prepare research and insights reports.
CATEGORIES OF DATA SUBJECT	Client customers, Client employees, experts, members of the public.
CATEGORIES OF PERSONAL DATA	Name, personal or business contact details (including address, telephone and mobile numbers and email address), age, gender, physical characteristics, place of work, job title, job classification, education level, income level, relevant experience, preferences, film/image/audio recordings, and other recorded opinions and actions of research participants in various mediums. Special categories: Only where necessary to provide the service(s) and as required and authorised by Client (e.g., dietary or accessibility requirements).
PROCESSING OPERATION	Use webforms to collect and store personal data of potential research participants. Where required, collect and record research participant consent on behalf of client. Use name, age, gender, preferences, physical characteristics, relevant experience to evaluate and select research participants. Use contact details and identity documents of selected research participants to facilitate interviews/focus groups. Collect, record and store opinions, actions, feedback, and insights of research participants. Use interviews/focus groups data to prepare research reports and analytics for Clients.
DURATION OF PROCESSING	The Personal Data will be processed by the Agency in accordance with Client instructions, for the duration of the Agreement, Services, or part thereof or in accordance with applicable law.
SUB- PROCESSORS	Research casting agencies, marketing research agencies, venues.
INTERNATIONAL TRANSFERS	International data transfers may be in scope as authorised by Client. In the absence of an applicable adequacy decision, Agency and its Sub-processors primarily rely on the use of approved European Commission Standard Contractual Clauses (SCCs) (or equivalent UK Addendum or Swiss adoption) as their principal safeguard for international transfers out of the EU, UK, or Switzerland, respectively.



11. Research & Insights: Quantitative Research

Research in connection with a Client's product or service, with a specific focus on statistical and data analysis.

PURPOSE OF PROCESSING	Facilitate research studies that provide Clients with insight on how to advertise their products and services (current and future) in the media. To understand the behaviour of individuals to guide Client's use of media.
CATEGORIES OF DATA SUBJECT	Individual members of the public or experts.
CATEGORIES OF PERSONAL DATA	Name, personal or business contact details (including address, telephone and mobile numbers and email address), job title employment details, education level, income level, image, age, IP addresses, activity or behaviour, opinions, and preferences. Special categories: Only where necessary to provide the service(s) and as required and authorised by Client (e.g., dietary or accessibility requirements).
PROCESSING OPERATION	Use personal data to evaluate and select research participants. Collect, record and store participant personal data and responses. Use response data to prepare research reports and analytics for Clients.
DURATION OF PROCESSING	The Personal Data will be processed by the Agency in accordance with Client instructions, for the duration of the Agreement, Services, or part thereof or in accordance with applicable law.
SUB- PROCESSORS	Marketing research agencies.
INTERNATIONAL TRANSFERS	International data transfers may be in scope as authorised by Client. In the absence of an applicable adequacy decision, Agency and its Sub-processors primarily rely on the use of approved European Commission Standard Contractual Clauses (SCCs) (or equivalent UK Addendum or Swiss adoption) as their principal safeguard for international transfers out of the EU, UK, or Switzerland, respectively.



12. Research & Insights: Listening Services	
Monitoring and analysing activity on social media and other websites, properties or platforms to gain insight into consumer attitudes, sentiments and preferences.	
PURPOSE OF PROCESSING	To gain insight into consumer attitudes and sentiment relevant to clients' brands and services by analysing and monitoring activity on social media and other websites, properties, or platforms.
CATEGORIES OF DATA SUBJECT	Individual members of the public or experts.
CATEGORIES OF PERSONAL DATA	Name, personal or business contact details (including address, telephone and mobile numbers and email address), online identifier like username or handles, age, gender expression, image, video, general location, occupation, statements, opinions, user-generated content, other public profile details shared online. Special categories: Only where necessary to provide the services and as required and authorised by Client. (e.g., race/ethnicity, religious beliefs, political beliefs, health information, dietary or accessibility requirements).
PROCESSING OPERATION	License or collect publicly available information on social media channels and other online sites, properties, or platforms. Analysis of collected data for trends, insights, and reports to client.
DURATION OF PROCESSING	The Personal Data will be processed by the Agency in accordance with Client instructions, for the duration of the Agreement, Services, or part thereof or in accordance with applicable law.
SUB- PROCESSORS	Social listening partners such as: BrandWatch, Meltwater, Affinio, Infegy, TalkWalker.
INTERNATIONAL TRANSFERS	International data transfers may be in scope as authorised by Client. In the absence of an applicable adequacy decision, Agency and its Sub-processors primarily rely on the use of approved European Commission Standard Contractual Clauses (SCCs) (or equivalent UK Addendum or Swiss adoption) as their principal safeguard for international transfers out of the EU, UK, or Switzerland, respectively.



13. Social Media Management and Maintenance Monitoring and management of Client social media channels. Engaging with consumers, influencers and publishing content.	
PURPOSE OF PROCESSING	To monitor social channels to provide Client with reports of relevant online conversations and propose responses, including to customer complaints. To commission content for marketing use. To engage influencers to create and publish marketing content on social media channels. To run compatibility checks on selected individuals and produce reporting KPIs on activity.
CATEGORIES OF DATA SUBJECT	Client customers or prospective customers; Talent, experts, influencers, Client brand ambassadors and agents/representatives.
CATEGORIES OF PERSONAL DATA	Name, personal or business contact details (including address, telephone and mobile numbers and email address), IP addresses and mobile device identifiers, place of work, job title, age, gender, social media account name, reach demographics, physical characteristics, relevant experience, film/image/audio recordings, online publicly available information. Special categories: Only where necessary to provide the service(s) and as required and authorised by Client (e.g., dietary or accessibility requirements).
PROCESSING OPERATION	Evaluate posted comments or customer complaints and create responses in collaboration with Client. Create reports of relevant online conversation trends for Client. Collect permissions for using user generated content. Select individuals to be brand ambassadors and managing commissioned marketing content. Track and report on performance KPIs.
DURATION OF PROCESSING	The Personal Data will be processed by the Agency in accordance with Client instructions, for the duration of the Agreement, Services, or part thereof or in accordance with applicable law.
SUB- PROCESSORS	Talent agencies, social media management applications.
INTERNATIONAL TRANSFERS	International data transfers may be in scope as authorised by Client. In the absence of an applicable adequacy decision, Agency and its Sub-processors primarily rely on the use of approved European Commission Standard Contractual Clauses (SCCs) (or equivalent UK Addendum or Swiss adoption) as their principal safeguard for international transfers out of the EU, UK, or Switzerland, respectively.



The Interpublic Group of Companies, Inc.

14. Talent Management Recruiting Talent to support marketing activities.	
PURPOSE OF PROCESSING	To source, engage and facilitate Talent and Client brand ambassadors for participation in Client projects.
CATEGORIES OF DATA SUBJECT	Talent including models, actors, Client customers, Client employees, celebrities, brand ambassadors, influencers, experts, and members of the public. Agents, representatives and employees of Talent and Client brand ambassadors.
CATEGORIES OF PERSONAL DATA	Name, personal or business contact details (including address, telephone and mobile numbers and email address), place of work, job title, age, gender, physical characteristics, relevant experience, publicly available information, opinions, film/image/audio recordings, written notes, identity documents. Special categories: Only where necessary to provide the service(s) and as required and authorised by Client (e.g., dietary or accessibility requirements).
PROCESSING OPERATION	Research, collate and evaluate prospective Talent. Facilitate Talent engagement, management, and participation in Client project. Using contact and personal details to provide hospitality/travel/accommodation arrangements.
DURATION OF PROCESSING	The Personal Data will be processed by the Agency in accordance with Client instructions, for the duration of the Agreement, Services, or part thereof or in accordance with applicable law.
SUB- PROCESSORS	Casting companies, Talent agencies, production companies.
INTERNATIONAL TRANSFERS	International data transfers may be in scope as authorised by Client. In the absence of an applicable adequacy decision, Agency and its Sub-processors primarily rely on the use of approved European Commission Standard Contractual Clauses (SCCs) (or equivalent UK Addendum or Swiss adoption) as their principal safeguard for international transfers out of the EU, UK, or Switzerland, respectively.



15. Technology Development (Apps, Websites, etc.) Technical development and where applicable, maintenance, of client-owned applications, websites, or other technical projects.	
PURPOSE OF PROCESSING	To provide application, website, or other technical development services on behalf of Client.
CATEGORIES OF DATA SUBJECT	Client customers or prospective customers, users, Talent, and Client brand ambassadors. Consumers providing customer insight in respect of consumer products or services.
CATEGORIES OF PERSONAL DATA	Name, personal or business contact details (including address, telephone and mobile numbers and email address), place of work, job title, age, gender, physical characteristics, IP address, device ID, location data. Special categories: Only where necessary to provide the service(s) and as required and authorised by Client (e.g., dietary or accessibility requirements).
PROCESSING OPERATION	Use personal data to develop app/website functionality and content. Use personal data to deliver apps; allow access to websites and social media services. Collect data to provide insight into app/website usage. Use personal data to improve app/website features and functionality. Profiling users to target features and functionality. Use contact and bank details to fulfil a contractual obligation e.g., providing a service or product to consumers.
DURATION OF PROCESSING	The Personal Data will be processed by the Agency in accordance with Client instructions, for the duration of the Agreement, Services, or part thereof or in accordance with applicable law.
SUB- PROCESSORS	Cloud storage/hosting providers (i.e., Amazon Web Services), Development tools (i.e., Adobe Experience Manager), etc.
INTERNATIONAL TRANSFERS	International data transfers may be in scope as authorised by Client. In the absence of an applicable adequacy decision, Agency and its Sub-processors primarily rely on the use of approved European Commission Standard Contractual Clauses (SCCs) (or equivalent UK Addendum or Swiss adoption) as their principal safeguard for international transfers out of the EU, UK, or Switzerland, respectively.



II. Specialised Services – Pharmaceutical and Medical

16. External Expert Engagement Engaging with external expert(s) in the healthcare/medical/pharmaceutical space to support Client objectives and develop content.	
PURPOSE OF PROCESSING	Engage with external expert(s) to assess expertise/influence ranking based on objective parameters (number of publications, editorial board membership, etc.), understand expert views on therapy areas and medicines, and collaborate and develop content.
CATEGORIES OF DATA SUBJECT	Healthcare professionals and providers (e.g., doctors, nurses, pharmacists) and other professionals (e.g., payers, patient advocates, key opinion leaders (KOLs)) working in the healthcare/medical/pharmaceutical space.
CATEGORIES OF PERSONAL DATA	Name, personal or business contact details (including address, telephone and mobile numbers and email address), age, gender, geolocation data, personal preferences and opinions, authorship of publications, membership of professional societies, nationality, qualifications, conflict of interest disclosures, debarment searches, voice and video recording and image. Special categories: Only where necessary to provide the service(s) and as required and authorised by Client (e.g., financial information, health/medical information, dietary or accessibility requirements, adverse events/product quality complaints).
PROCESSING OPERATION	Use personal details to help with developing and editing scientific content, building a strategy/campaign for a brand, and understanding views on therapy areas and medicines.
DURATION OF PROCESSING	The Personal Data will be processed by the Agency in accordance with Client instructions, for the duration of the Agreement, Services, or part thereof or in accordance with applicable law.
SUB- PROCESSORS	Research organisations, health publishers (e.g., IQVIA, Techspert), technology platforms, medical writing and editorial services, production vendors and printers.
INTERNATIONAL TRANSFERS	International data transfers may be in scope as authorised by Client. In the absence of an applicable adequacy decision, Agency and its Sub-processors primarily rely on the use of approved European Commission Standard Contractual Clauses (SCCs) (or equivalent UK Addendum or Swiss adoption) as their principal safeguard for international transfers out of the EU, UK, or Switzerland, respectively.



17. Market Research (Interviews/Surveys/Insight/Consultancy)	
Conducting research and providing business insights and analysis for Clients.	
PURPOSE OF PROCESSING	Conduct research and provide business insights and analysis for Clients.
CATEGORIES OF DATA SUBJECT	Study participants (industry professionals) such as healthcare professionals and providers (e.g., doctors, nurses, pharmacists, healthcare payers and regulators). Client customers/prospective customers, patients/carers/patient organisations and consumers.
CATEGORIES OF PERSONAL DATA	Name, personal or business contact details (including address, telephone and mobile numbers and email address), age, years of experience, gender, employment status, personal preferences and opinions, nationality, professional qualifications/grade, specialty, conflict of interest disclosures, voice and/or video recording (e.g. KOL interviews), image, and information about one's experiences and interactions with health practitioners. Special categories: Only where necessary to provide the service(s) and as required and authorised by Client (e.g., dietary requirements, health/medical information, adverse events/product quality complaints).
PROCESSING OPERATION	Conduct interviews and surveys in person, by email, phone and/or using tech platforms. Conduct insight gathering activities. Analyse recorded and written responses to understand insights for campaign development (e.g., sales materials, marketing personas). Maintain information about study participants.
DURATION OF PROCESSING	The Personal Data will be processed by the Agency in accordance with Client instructions, for the duration of the Agreement, Services, or part thereof or in accordance with applicable law.
SUB- PROCESSORS	Various industry professionals, research panel providers, production vendors and hospitality vendors.
INTERNATIONAL TRANSFERS	International data transfers may be in scope as authorised by Client. In the absence of an applicable adequacy decision, Agency and its Sub-processors primarily rely on the use of approved European Commission Standard Contractual Clauses (SCCs) (or equivalent UK Addendum or Swiss adoption) as their principal safeguard for international transfers out of the EU, UK, or Switzerland, respectively.



18. Meetings and Events Running and supporting meetings and events for content development.	
PURPOSE OF PROCESSING	Run and support meetings and events with external parties to present their work, engage, educate, and enable interactions on content development. Arrange travel, hospitality, accommodation, honoraria, and visa applications.
CATEGORIES OF DATA SUBJECT	Healthcare professionals and healthcare providers (e.g., doctors, nurses, pharmacists), and other professionals (e.g., KOLs) who work in the healthcare/medical/pharmaceutical sector. Patients or patient representatives (e.g., charities, other organisations), and/or carers. Client personnel (brand managers, Medical, Legal and Regulatory).
CATEGORIES OF PERSONAL DATA	Name, personal or business contact details (including address, telephone and mobile numbers and email address), age, gender, government identifiers (e.g. passport, driver's licence, social security number), society membership details, personal preferences and opinions, nationality, qualifications, emergency contact details, voice and/or video recording, image, conflict of interest disclosures, and where applicable, log-in details for congresses. Special categories: Only where necessary to provide the service(s) and as required and authorised by Client (e.g., health/medical information, financial information, dietary or accessibility requirements, adverse events/product quality complaints).
PROCESSING OPERATION	Use personal data and professional opinions to help with developing and editing content. Use contact details and identity information to invite people to meetings, arrange travel, hospitality, accommodation, visa applications and pay honoraria. Where required, collect and analyse attendee feedback and insights for client reporting. Disclose conflict of interest data as part of the presentation submission. Use log-in details and society membership information to upload presentations to congress websites and portals.
DURATION OF PROCESSING	The Personal Data will be processed by the Agency in accordance with Client instructions, for the duration of the Agreement, Services, or part thereof or in accordance with applicable law.
SUB- PROCESSORS	Audio visual companies, logistics companies, hospitality, production vendors, online meeting/events platforms and interactive poll providers.
INTERNATIONAL TRANSFERS	International data transfers may be in scope as authorised by Client. In the absence of an applicable adequacy decision, Agency and its Sub-processors primarily rely on the use of approved European Commission Standard Contractual Clauses (SCCs) (or equivalent UK Addendum or Swiss adoption) as their principal safeguard for international transfers out of the EU, UK, or Switzerland, respectively.



19. Publications (Medical Context) Collaborating with authors to develop content for online or paper publications, meetings and guidance documents.	
PURPOSE OF PROCESSING	Enable interactions on scientific content development. Enable agency to upload content to meeting/journal content portal websites.
CATEGORIES OF DATA SUBJECT	Healthcare professionals and providers (e.g., doctors, nurses, pharmacists). Patients, patient advocates (charities, organisations). Client personnel (e.g., Medical, Legal and Regulatory).
CATEGORIES OF PERSONAL DATA	Name, personal or business contact details (including address, telephone and mobile numbers and email address), nationality, qualifications, personal preferences, opinions, voice and/or video recording, image, conflict of interest disclosures. Log-in details for meeting abstract, poster, presentation or journal publication upload, society membership information. Special categories: Only where necessary to provide the service(s) and as required and authorised by Client (e.g., dietary or accessibility requirements, health/medical information, financial information, adverse events/product quality complaints).
PROCESSING OPERATION	Engage authors to develop and edit scientific content. Disclose conflict of interest data as part of the publication submission. Use log-in details and society membership information to upload content to meeting/journal content portals and websites.
DURATION OF PROCESSING	The Personal Data will be processed by the Agency in accordance with Client instructions, for the duration of the Agreement, Services, or part thereof or in accordance with applicable law.
SUB- PROCESSORS	Medical publishers, medical writing, and editorial services.
INTERNATIONAL TRANSFERS	International data transfers may be in scope as authorised by Client. In the absence of an applicable adequacy decision, Agency and its Sub-processors primarily rely on the use of approved European Commission Standard Contractual Clauses (SCCs) (or equivalent UK Addendum or Swiss adoption) as their principal safeguard for international transfers out of the EU, UK, or Switzerland, respectively.



20. Technology Development (Apps, Websites) Technical development of client-owned technology such as applications, websites, chatbots, interactive experiences or other technical projects, etc.	
PURPOSE OF PROCESSING	Provide application, website, or other technical development services.
CATEGORIES OF DATA SUBJECT	Healthcare/medical and/or pharmaceutical industry professionals (e.g., doctors, nurses, pharmacists). Patients, patient families and caregivers, patient organisations, users, consumers.
CATEGORIES OF PERSONAL DATA	Name, personal or business contact details (including address, telephone and mobile numbers and email address), age, voice and/or video recording, image, gender, geolocation, scientific interests, personal preferences and opinions, browsing history, IP address, digital advertisement interaction information, pseudonymized/unique identifiers, website registration information and website/app event data. Special categories: Only where necessary to provide the service(s) and as required and authorised by Client (e.g., health/medical information, adverse events/product quality complaints and/or dietary requirements).
PROCESSING OPERATION	Use personal data to develop (e.g., content), manage access and deliver app/website functionality and content. Use personal data to analyse usage and improve app/website features and functionality. Use personal data to collect health/medical information for campaign development (e.g., marketing personas, consumer insights). Profiling users to target features and functionality.
DURATION OF PROCESSING	The Personal Data will be processed by the Agency in accordance with Client instructions, for the duration of the Agreement, Services, or part thereof or in accordance with applicable law.
SUB- PROCESSORS	Cloud storage/hosting providers (e.g., Amazon Web Services, GoDaddy), development and ops tools (e.g., Adobe Experience Manager, JetBrains, ITGIX), communications tools (e.g., Zoom) and website domain registry services (e.g., GoDaddy). Cybersecurity companies (e.g., Snyc), tracking and analytics (Google Analytics, New Relic), application security companies (e.g., Veracode), web content management (e.g., Drupal (Acquia)) and deployment software (e.g., DeployHQ). Events tech platforms (e.g., Crowdcomms, BigMarker) and AI tools (e.g., Adobe Firefly).
INTERNATIONAL TRANSFERS	International data transfers may be in scope as authorised by Client. In the absence of an applicable adequacy decision, Agency and its Sub-processors primarily rely on the use of approved European Commission Standard Contractual Clauses (SCCs) (or equivalent UK Addendum or Swiss adoption) as their principal safeguard for international transfers out of the EU, UK, or Switzerland, respectively.

III. Specialist Services – Media:

21. Programmatic Media Buying Automated buying of advertisements on websites, apps and digital properties using Real Time Bidding technology executed through DSPs.	
PURPOSE OF PROCESSING	To use approved Client or third-party data to create customised audiences for buying targeted programmatic advertising through a Demand Side Platform (DSP) partner. To provide reporting and analysis of campaign performance and effectiveness.
CATEGORIES OF DATA SUBJECT	Client customers, prospective customers, visitors to Client websites, and users of websites and applications where Client's ad is served.
CATEGORIES OF PERSONAL DATA	Name, personal or business contact details (including address, telephone and mobile numbers and email address), location data (incl. latitude & longitude, mobile GPS location, postcode), date of birth, age, gender, mobile number, mobile device ID, online identifier or unique ID, IP address, demographics, interests, preferences, brand interaction, past purchase intent and history, and other data categories, dependent on exact configuration of custom fields for pixels. Special categories: Only where necessary to provide the services and as required and authorised by Client.
PROCESSING OPERATION	Automated buying of advertisements on websites, apps and digital properties via Real Time Bidding technology executed through DSPs which: Uses approved Client data (e.g., Client CRM data, data collected via pixels on Client websites/properties, data licensed from third parties by Client): Client uploads Client data directly to platforms such as a DSP, customer data platform (CDP) or data management platform (DMP), application programming interface (API) connection, or data onboarder. DSP, CDP, DMP or data onboarder hashes Client data and uses de-identifier to match and activate advertising or; Uses DSP-controlled personal data (first-party and third-party) which is employed to create audience segments made available to advertisers. Aggregated campaign performance data is received from platform for preparation of bespoke reports and analysis for Client.
DURATION OF PROCESSING	The Personal Data will be processed by the Agency in accordance with Client instructions, for the duration of the Agreement, Services, or part thereof or in accordance with applicable law.
SUB-PROCESSORS	DSP partners such as: Google DV360, The Trade Desk, Yahoo, Adelphic, Cognitiv, Samsung, Adform, Amazon, Teads, Quantcast and Criteo.
INTERNATIONAL TRANSFERS	International data transfers may be in scope as authorised by Client. In the absence of an applicable adequacy decision, Agency and its Sub-processors primarily rely on the use of approved European Commission Standard Contractual Clauses (SCCs) (or equivalent UK Addendum or Swiss adoption) as their principal safeguard for international transfers out of the EU, UK, or Switzerland, respectively.



22. Publisher Direct Media Buying (Non-Programmatic) Direct non-programmatic buying of digital media on publisher websites and apps, including campaign performance analysis.	
PURPOSE OF PROCESSING	To buy targeted advertising for Clients on publisher websites, either directly or via advertising networks. To provide reporting and analysis of campaign performance and effectiveness, using viewing, click-through, conversion and ad delivery data derived from publisher pixels.
CATEGORIES OF DATA SUBJECT	Client customers or prospective customers visiting Client websites or publisher websites on which the client's advertisement is served.
CATEGORIES OF PERSONAL DATA	Name, personal or business contact details (including address, telephone and mobile numbers and email address), IP Addresses, cookie IDs, location data (i.e., postcode, latitude/longitude), mobile device ID, preferences, online browsing information, other unique IDs. Special categories: Only where necessary to provide the service(s) and as required and authorised by Client.
PROCESSING OPERATION	Placement of pixels by agency or Client on Client websites, applications, and other properties to track actions of visitors who have clicked on Client ad on publisher website/property. Collection of aggregated ad data on campaign performance and preparation of bespoke reports and analysis for Client.
DURATION OF PROCESSING	The Personal Data will be processed by the Agency in accordance with Client instructions, for the duration of the Agreement, Services, or part thereof or in accordance with applicable law.
SUB- PROCESSORS	Online publishers, online video services, Connected TV vendors, and advertising networks – e.g., Spotify, Hearst, VOX, Conde Nast, Axel Springer, Rakuten, Roku, Kayak, Guardian News & Media, Bauer.
INTERNATIONAL TRANSFERS	International data transfers may be in scope as authorised by Client. In the absence of an applicable adequacy decision, Agency and its Sub-processors primarily rely on the use of approved European Commission Standard Contractual Clauses (SCCs) (or equivalent UK Addendum or Swiss adoption) as their principal safeguard for international transfers out of the EU, UK, or Switzerland, respectively.

23. Paid Search Media Buying Media buying on search engines targeted to reach custom audience segments.	
PURPOSE OF PROCESSING	To use approved Client, third-party data, or search platform first-party data for creation of customised audiences to buy targeted advertising on search engines or in search functions within a website or platform. To provide reporting and analysis of campaign performance and effectiveness.
CATEGORIES OF DATA SUBJECT	Client customers, prospective customers visiting Client websites, or users of search engines on which the Client's ad is served.
CATEGORIES OF PERSONAL DATA	Name, personal or business contact details (including address, telephone and mobile numbers and email address), location data (incl. latitude & longitude, mobile GPS location, postcode), postcode, date of birth, age, gender, mobile number, mobile device ID, online identifier or unique ID, IP address, demographics, interests, preferences, brand interaction, past purchase intent and history, and other data categories, dependent on exact configuration of custom fields for pixels. Special categories: Only where necessary to provide the services and as required and authorised by Client.
PROCESSING OPERATION	Using approved Client data (e.g., Client CRM data, data collected via pixel(s) on Client site(s)/properties, data licensed from third parties by Client, etc.): Client uploads Client data to search engine provider directly, through customer data platform (CDP) or data management platform (DMP), application programming interface (API) connection, or data onboarder. Search engine, CDP, DMP or data onboarder hashes data and Search engine uses deidentifier to match and activate advertising. Using search engine's first party data: Agency uploads client-approved keyword list to search platform, which allows Agency to bid on search platform users based on their search keywords. Platform pixels fire when users click on a client advertisement shown on a search engine or website search function, generating a click ID which is used for conversion measurement and/or retargeting. Aggregated campaign performance data is received from search provider for preparation of bespoke measurement reports and analysis for Client.
DURATION OF PROCESSING	The Personal Data will be processed by the Agency in accordance with Client instructions, for the duration of the Agreement, Services, or part thereof or in accordance with applicable law.
SUB- PROCESSORS	Dedicated search engine providers such as Google, Microsoft Bing, Yahoo, DuckDuckGo, and Ecosia plus websites and online platforms (e.g., YouTube) which include search functions.
INTERNATIONAL TRANSFERS	International data transfers may be in scope as authorised by Client. In the absence of an applicable adequacy decision, Agency and its Sub-processors primarily rely on the use of approved European Commission Standard Contractual Clauses (SCCs) (or equivalent UK Addendum or Swiss adoption) as their principal safeguard for international transfers out of the EU, UK, or Switzerland, respectively.

24. Paid Social Media Buying Media buying on social media sites targeted to reach custom audience segments.	
PURPOSE OF PROCESSING	To use Client or third-party data for creation of customised audiences to buy targeted advertising on social media platforms. To provide reporting and analysis of campaign performance and effectiveness.
CATEGORIES OF DATA SUBJECT	Client customers, prospective customers visiting Client websites, or users of social media sites on which the Client's ad is served.
CATEGORIES OF PERSONAL DATA	Name, personal or business contact details (including address, telephone and mobile numbers and email address), location data (incl. latitude & longitude, mobile GPS location, postcode), postcode, date of birth, age, gender, mobile number, mobile device ID, online identifier or unique ID, IP address, demographics, interests, preferences, brand interaction, past purchase intent and history, and other data categories, dependent on exact configuration of custom fields for pixels. Special categories: Only where necessary to provide the services and as required and authorised by Client.
PROCESSING OPERATION	Using Client data: Client uploads CRM data to social media platform directly, through customer data platform (CDP) or data management platform (DMP) application programming interface (API) connection, or data onboarder. Platform, CDP, DMP or data onboarder hashes data and Platforms uses de-identifier to match and activate advertising. Using Social Media Platform's data: Placement of platform pixels on client website to track actions of visitors who clicked on client ad on social media platform, enabling audience reach and conversions to be measured and audiences to be created based on visitor actions. Re-engagement of social media users on platform based on interaction with client ad (e.g., retargeting based on video views, etc.). Aggregated campaign performance data is received from social media platform for preparation of bespoke reports and analysis for client.
DURATION OF PROCESSING	The Personal Data will be processed by the Agency in accordance with Client instructions, for the duration of the Agreement, Services, or part thereof or in accordance with applicable law.
SUB- PROCESSORS	Paid social media platforms such as: Meta (Facebook & Instagram), TikTok, X, Pinterest, Reddit, LinkedIn, Nextdoor and Snap.
INTERNATIONAL TRANSFERS	International data transfers may be in scope as authorised by Client. In the absence of an applicable adequacy decision, Agency and its Sub-processors primarily rely on the use of approved European Commission Standard Contractual Clauses (SCCs) (or equivalent UK Addendum or Swiss adoption) as their principal safeguard for international transfers out of the EU, UK, or Switzerland, respectively.

25. Custom audience creation & activation for targeted digital media buying Creating custom audiences in agency Audience Platform and activating digital media buying.	
PURPOSE OF PROCESSING	To create customised audience segments via audience analysis/matching using agency Audience Platform and activate for targeted media buying.
CATEGORIES OF DATA SUBJECT	Client customers identified using Client first-party data (e.g., website visitors, CRM), or third-party data. Prospective client customers identified using techniques like modeling, leveraging third-party data.
CATEGORIES OF PERSONAL DATA	Unique identifiers, attribute data such as lifestyle, propensities, preferences, activities, etc.
PROCESSING OPERATION	Onboarding pseudonymised data into agency Audience Platform: Client or client-approved data provider provides personal data to a data onboarder (e.g., LiveRamp, Acxiom) that pseudonymizes Client personal data. Data onboarder provides pseudonymized data to onboard to agency Audience Platform. A match pairs each onboarded data record with a corresponding record in the Audience Platform, where possible, creating audiences within the Audience Platform. If instructed by Client, the agency can assemble the attributes (demographic, lifestyle, behavioural) associated with record IDs into a descriptive report of the segment. Activation of Audiences: Data is sent in pseudonymised form from the Audience Platform to activation partner via data onboarder or direct API connection. The activation partner then matches the data to their dataset to create a targetable audience and deliver the ad.
DURATION OF PROCESSING	The Personal Data will be processed by the Agency in accordance with Client instructions, for the duration of the Agreement, Services, or part thereof or in accordance with applicable law.
SUB- PROCESSORS	Onboarders such as LiveRamp, Throttle, OpenAP, Acxiom; Data providers such as Acxiom, YouGov, Dynata, comScore, Semasio, B4P; and Activation Partners such as Meta, The Trade Desk, Google DV360, Channel 4, Amazon Ads.
INTERNATIONAL TRANSFERS	International data transfers may be in scope as authorised by Client. In the absence of an applicable adequacy decision, Agency and its Sub-processors primarily rely on the use of approved European Commission Standard Contractual Clauses (SCCs) (or equivalent UK Addendum or Swiss adoption) as their principal safeguard for international transfers out of the EU, UK, or Switzerland, respectively.



26. Lead Generation Acquiring new customers for Clients by using third-party sourced lead generation data.	
PURPOSE OF PROCESSING	To acquire new customers for Clients via offline (e.g., in-person events) and online activity (e.g., automated email marketing, publisher-led webinars, publication of white papers and thought leadership content, interaction with an online ad or form).
CATEGORIES OF DATA SUBJECT	Prospective customers.
CATEGORIES OF PERSONAL DATA	Name, personal or business contact details (including address, telephone and mobile numbers and email address), date of birth, job title, employer details, business contact details, marketing preferences, etc. Special categories: Only where necessary to provide the services and as required and authorised by Client (e.g., dietary or accessibility requirements).
PROCESSING OPERATION	Lead generation data sourced from the third-party vendor or captured via the technology vendor is provided directly to the Client by the third-party vendor or technology vendor. Client grants Agency access to the Client's marketing automation platform, where lead generation data is analysed and leads are then nurtured to maximise conversions from activities like email marketing.
DURATION OF PROCESSING	The Personal Data will be processed by the Agency in accordance with Client instructions, for the duration of the Agreement, Services, or part thereof or in accordance with applicable law.
SUB- PROCESSORS	Lead generation partners such as: Madison Logic, Acquisition Inc., SWZD, Intentsify, Future plc, Demand Science, Tech Target, Inbox Insight, Headley Media, MRP, RIA Database, Ziff Davis, Yahoo, Demandbase.
INTERNATIONAL TRANSFERS	International data transfers may be in scope as authorised by Client. In the absence of an applicable adequacy decision, Agency and its Sub-processors primarily rely on the use of approved European Commission Standard Contractual Clauses (SCCs) (or equivalent UK Addendum or Swiss adoption) as their principal safeguard for international transfers out of the EU, UK, or Switzerland, respectively.



27. Advertising Operations	
Configuring and executing digital advertising campaigns and measuring campaign performance.	
PURPOSE OF PROCESSING	To ensure online advertising campaigns for Clients are served with the correct mix and rotation of creative executions and verify the appearance of online ad campaigns. To measure campaign performance via use of tracking technologies (e.g., pixels, tags, etc.).
CATEGORIES OF DATA SUBJECT	Client customers and prospective customers.
CATEGORIES OF PERSONAL DATA	Track technologies, collect IP addresses, cookie IDs, location data (e.g., latitude & longitude, postcode, mobile GPS location), unique IDs, mobile device ID, preferences, conversion data, and other data categories, dependent on exact configuration of custom fields for pixels. Special categories: Only where necessary to provide the services and as required and authorised by Client.
PROCESSING OPERATION	Loading creative assets into ad server, attach click through URLs and generate tags (small scripts) for publishers and DSPs to host and serve the asset via the ad server. Configuring ad tracking and measurement technologies to an ad creative or Client site either by delivering code to Client or on behalf of Client as authorised. Campaign measurement planning and maintenance and upkeep.
DURATION OF PROCESSING	The Personal Data will be processed by the Agency in accordance with Client instructions, for the duration of the Agreement, Services, or part thereof or in accordance with applicable law.
SUB- PROCESSORS	Ad serving partners such as: Google CM360, Flashtalking and AdForm; verification partners such as: Integral Ad Science, DoubleVerify and Adelaide. Audience measurement partners such as: Nielsen, Kantar, Dynata, Audience Project and Fiducia.
INTERNATIONAL TRANSFERS	International data transfers may be in scope as authorised by Client. In the absence of an applicable adequacy decision, Agency and its Sub-processors primarily rely on the use of approved European Commission Standard Contractual Clauses (SCCs) (or equivalent UK Addendum or Swiss adoption) as their principal safeguard for international transfers out of the EU, UK, or Switzerland, respectively.