

DENTSU SOKEN UK, LTD. (the 'Company') Privacy Notice

This notice explains how information about you is used.

The Company will be the data controller and can be contacted as follows:

By post: Data Protection Manager, DENTSU SOKEN UK, LTD, City Point, 1 Ropemaker Street, London, EC2Y 9HT.

By e-mail: GDPR@uk.dentsusoken.com

By phone: 020 7153 1650

The information we gather

The Company gathers certain information about you. Information about you is also used by our affiliated entities and group companies including our parent company, DENTSU SOKEN INC., in Japan (our 'group companies'). When we do so will comply with the retained EU law version of the General Data Protection Regulation ((EU) 2016/679) as defined in the Data Protection Act 2018 ('UK GDPR').

In this notice, references to 'we' or 'us' means the Company and our group companies.

Information that we gather about you may include without limitation your name, business contact details, your business position or title and your employer. The provision of information by you is entirely voluntary.

We may also obtain information about you from third parties, such as our group companies, service providers (such as external hotline service provider) and agents.

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

The legal basis for processing

The processing of your information will usually take place as it is necessary (i) for the performance of contract, (ii) to comply with our legal obligation or (iii) for legitimate interests we or third party pursue and your interests and fundamental rights do not override those interests. Our legitimate interests are that we can conduct and manage our business in a way to enable us to give you or your employer the best service/ product or to receive the best service/ product from you or your employer. We make sure we consider and balance any potential impact on you and your rights before we process your information for our legitimate interests.

Information about third parties

Information we process as described in this notice may also include information about third parties whose details you supply to us.

Systems used to process data

We gather information directly from you and also via our websites and other technical systems. These may include, for example, our:

- computer networks and connections
- communications systems
- trading platforms
- email and instant messaging systems
- intranet and Internet facilities
- telephones, voicemail, mobile phone records
- and other hardware and software owned, used or provided by or on behalf of us and our group companies.

Cookies

When you use our website we may gather information about you through Internet access logs, cookies and other technical means. 'Cookies' are text files placed on your computer to collect Internet log information and user behaviour information. These are used to track website usage and monitor website activity and for other data processing reasons set out below.

Some of the cookies we use are essential for parts of the site to operate and have already been set. You may delete and block all cookies from this site, but parts of the site will not work. To find out more about the cookies we use and how to delete them, please see our cookie policy on our website.

Reasons for processing

We process information about you for the following reasons:

- to provide our services
- compliance with legal, regulatory and corporate governance obligations and good practice
- gathering information as part of investigations by regulatory bodies or in connection with legal proceedings or requests
- ensuring business policies are adhered to
- operational reasons, such as recording transactions, training and quality control
- ensuring the confidentiality of commercially sensitive information
- security vetting, investigating claims, complaints and allegations of criminal offences
- statistical analysis
- preventing unauthorised access and modifications to systems
- marketing our business and those of our group
- providing customer services

Data sharing

We may disclose and exchange information with our group companies, credit reference agencies, service providers, representatives and agents, as well as with law enforcement agencies and regulatory bodies (including Information Commissioner's Office ('ICO')) for the reasons described in this notice.

When the hotline service provider shares the reported information with us, the information shall be in principle anonymized. However, if there is any data breach in relation to the use of hotline service, we may be required to make a report to the ICO sharing the information about you. In this case, the anonymity could be lifted in order to comply with the relevant regulation.

International data transfer

Information may be transferred internationally to Japan and other countries around the world, including those without data protection laws equivalent to those in the UK, for the reasons described in this notice. There is an adequacy regulation in respect of Japan, which means Japan is deemed to provide an adequate level of protection for your personal information. Otherwise, we will ensure to have appropriate safeguards in place such as binding corporate rules, standard contractual clauses approved for use in the UK.

If you would like further information please contact our Data Protection Manager (see above).

Retention periods

Your data will be held in accordance with the Company's retention policy, which is available on request. In general, your data will be stored for the duration of your relationship with us, plus 6 years.

Further enquiries

Please contact the Data Protection Manager if you would like to correct or request (in accordance with applicable law) information that we hold relating to you or if you have any questions in relation to the above.

Your rights

You have a number of important rights, which can be exercised free of charge. You have the right to request:

- access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address
- require us to correct any mistakes in your information which we hold
- require the erasure of personal information concerning you in certain situations
- receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- object at any time to processing of personal information concerning you for direct marketing
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- object in certain other situations to our continued processing of your personal information
- otherwise restrict our processing of your personal information in certain circumstances.

Where you have given consent to any data processing, you have the right to withdraw that consent at any time. When you make any of the above requests in relation to your report made through the hotline system, we need to ask the hotline service provider to lift the anonymity of the information to comply with your request.

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the ICO on individuals' rights under the UK GDPR.

If you would like to exercise any of these rights, please contact our Data Protection Manager in writing (see above), providing enough information to identify you and let us know which information to which your request relates.

If you are not satisfied with any complaint you have with us, you also have the right to make a complaint to the ICO. You can contact the ICO at ico.org.uk/concerns/ or by telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

We may change this privacy notice from time to time, when we do we will inform you via e-mail or by other appropriate means.

Updated 02 January 2024

*Prior to 2nd January 2024, DENTSU SOKEN UK, LTD. operated under the name ISI-Dentsu of Europe, Ltd.