

## **PRIVACY STATEMENT FOR NON-EMPLOYEES**

### **Protecting Your Privacy**

This privacy statement applies to BBDO Canada Corp and its Canadian affiliates, including BBDO Toronto, Proximity Canada, SGL Communications, Ricochet Post Productions, ("BBDO", "we", "us", "our") and explains how we collect, use and disclose personal information in Canada. "Personal information" is information about an identifiable individual, subject to more particular definitions or interpretations under applicable law. This privacy statement does not apply to personal information about employees, contractors or other temporary or permanent staff, consultants, volunteers or other individuals assigned to BBDO (collectively, "Members of BBDO"), or to any information which is not personal information as defined in or interpreted under applicable law.

BBDO offers and provides marketing, advertising and communications services and information to a wide range of clients. In order to provide these services, it is sometimes necessary for us to collect, use and disclose personal information about our clients and their customers. This statement sets forth our general policies in dealing with such personal information.

### **The Information We Collect and How We Use It**

*Information in relation to clients, their customers and others, generated in the course of providing our services*

The kinds of personal information we may collect and use in relation to clients and their customers will depend upon the information and services requested. However, subject to applicable law, it may include:

- name, address, e-mail address, telephone number(s) and other contact details;
- financial, credit, billing and account information;
- information that is material to the services we provide for you and your business operations;
- information you communicate to us, whether online or offline; and
- other information we may collect with your consent or as permitted or required by law.

We use this information:

- to offer and provide services to you;
- to process payments, and otherwise manage, administer and enforce accounts;
- to deal with third parties on your behalf or in furtherance of providing services to you;
- to communicate with you regarding the services you request and to respond to your requests and inquiries;
- to generally manage and administer our business including to maintain business records for reasonable periods and to defend and bring legal actions; and
- for other purposes with your consent, or as permitted or required by law.

*Information in relation to potential Members of BBDO*

If you apply for a position at BBDO, we will collect the personal information contained in, and generated in relation to, your application package, in order to evaluate your application and assess whether to offer you a position at BBDO. For candidates who are not offered or do not accept a position, we normally retain this information for a reasonable period in the event that an appropriate position becomes

available or that you re-apply to BBDO. If you accept a position at BBDO, the information will be retained in accordance with our privacy procedures applicable to the personal information of Members of BBDO.

BBDO may collect information about third-party agents, vendors, suppliers and foreign associates ("Service Providers") who provide goods, services and information to BBDO. This information would include name and contact information as well as any information (such as banking information) that we need to pay you for your services and other relevant information, such as experience and qualifications of Service Providers.

We use this information in order to assess suitability for particular assignments; to contact you, where necessary, in relation to the goods, services and information you are providing to BBDO; and to pay you for your services.

#### *Information about guests of and visitors to BBDO*

BBDO collects information about its guests and visitors. Specifically, visitors to BBDO offices may be asked to provide their name, telephone number and organization name. This information is retained by BBDO as long as necessary for security or emergency preparedness purposes. BBDO may also install video cameras in public-access areas on its premises and will post signs notifying individuals of the existence and purpose of any such cameras. We use the information we collect about guests of and visitors to BBDO to enable us to act responsibly in the event of a health or other crisis or emergency and to enhance workplace security.

#### **How We Collect Information About You**

We typically collect personal information directly from you or through our interaction with you, in particular where such information is deliberately disclosed to us for the purposes of providing particular services. You may sometimes provide us with the personal information you collect from your customers to aid BBDO in providing its services to you.

In relation to potential Members of BBDO, in addition to personal information that you provide, we may collect personal information from:

- the third parties you provide as references in support of your application; and
- individuals involved in the evaluation and review process.

#### **How We Disclose and Share Your Information**

We may disclose the personal information we collect about clients or other individuals we deal with to third parties, including:

- where you have instructed us to disclose your personal information to a third party for a designated purpose;
- to your authorized agent;
- as necessary to meet legal, regulatory, insurance, audit, and security requirements; and
- with your consent or as permitted or required by law.

We may disclose personal information about former BBDO Members in order to provide an employment reference to a third party where you have requested, or consented to, the provision of the reference.

*Service Providers.* BBDO may also transfer your personal information to our Service Providers hired to administer or provide products, services or information on our behalf, including for billing, audit and compliance reviews, records storage, credit and criminal background checks, couriers, legal counsel, property management. We use contractual or other measures to require the organizations with whom we transfer your personal information for these purposes to use your personal information only to perform the services we have hired them to provide. Note that some of the Service Providers that process or handle personal information on our behalf are located outside of Canada in the United States and the United Kingdom. As a result, your personal information may be transferred, stored and/or processed outside Canada in connection with the purposes described in this privacy statement. Contractual or other measures we may use to protect your personal information are subject to the legal requirements of the foreign jurisdictions where your personal information may be transferred, stored or processed, for example lawful requirements to disclose information to government authorities in those countries.

*Business Transactions.* We may use and disclose personal information in connection with the proposed or actual financing, securitization, insuring, sale, assignment or other disposal of all or part of BBDO or our business or assets, for the purposes of evaluating and/or performing the proposed transaction. Our successors or assignees may use and disclose your personal information for similar purposes as those described in this privacy statement.

### **Your Consent**

We collect, use and disclose your personal information with your consent or as permitted or required by law. Your consent may be express or implied, depending on the circumstances and the sensitivity of the personal information in question. For example, in most cases, a client's consent to the collection, use and disclosure of personal information by BBDO may be implied by the fact that the client has engaged BBDO to provide services, where the collection, use and disclosure of personal information relates to the performance of those services by BBDO. If you provide personal information about another person to us, including your customers, we assume you have the consent of that individual to enable us to collect, use or disclose their information as described in this statement or as instructed by you. If you choose to provide personal information to BBDO, we assume that you consent to the collection, use and disclosure of your personal information as outlined in this privacy statement. You may withdraw your consent to our collection, use and disclosure of personal information at any time, subject to contractual and legal restrictions and legal notice. However, if you withdraw your consent to our collection, use or disclosure of your personal information we may not be able to provide you with certain services.

### **Security**

BBDO has implemented physical, organizational and technological security measures to safeguard the personal information in our custody or control. These include safeguards to protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification. Authorized Members of BBDO will have access to personal information as necessary in order for BBDO to perform the services for which it has been retained. Members of BBDO sign a confidentiality agreement protecting the confidential information of BBDO and its clients. BBDO has implemented policies and procedures related to limiting access to programs and data to relevant persons, and ensuring our operations maintain security, environmental protection and risk mitigation initiatives.

### **Access, Correction, Inquiries and Complaints**

We may establish and maintain a file of your personal information for the purposes described above, which will be accessible at our Toronto office. If you wish to request access to, or correction of, your personal information in the custody or control of BBDO, please make your request in writing to our Privacy Officer at the address below. We may need to verify your identity before searching for, providing

you with access to, or correcting your personal information. In some circumstances, we may not provide access to your personal information, for example if it contains the personal information of other persons, if it constitutes confidential commercial information, if it is protected by solicitor-client privilege, or if it is otherwise not properly the subject of an access request. Where the request for access is made by a customer of a client, BBDO will report such request to the client prior to providing such information to the customer, provided we continue to be in compliance with applicable privacy legislation.

Since we predominantly use personal information to provide services, it is important that the information be accurate and up-to-date. Please inform us as soon as possible of any changes to your personal information.

If you have any questions, requests or complaints about our personal information practices, please contact our Privacy Officer at 2 Bloor Suite West, 28<sup>th</sup> floor, Toronto, ON, or via email at [privacy@bbdo.ca](mailto:privacy@bbdo.ca)

### **Changes to This Statement**

This privacy statement may be revised from time to time. If we intend to use or disclose personal information for purposes materially different than those described in this statement, we will make reasonable efforts to notify affected individuals, if necessary, including by revising this statement. Please check this statement frequently to obtain the current version. Your continued provision of personal information or use of our services following any changes to this statement constitutes your acceptance of any such changes. This privacy statement is effective as of April 1, 2014.