



Last Updated: 3/31/2022

This Applicant Recruitment Privacy Notice ("Privacy Notice") describes how FCB Worldwide Inc and its affiliates and agencies which are part of FCB (collectively, "Agency," "we," or "us") use the Personal Information you provide to us through the Careers section of our website ("Site") and offline in connection with your application for a position with Agency or on third party sites or from third party recruiters where you express an interest in a job opening, with whom we share it, and the choices available regarding our use of your Personal Information. Privacy Notice also describes the measures we take to safeguard the Personal Information, how long we retain it, and how individuals can contact us with questions about our privacy practices and requests to exercise their rights.

If you are a California resident, please view our California Consumer Privacy Act Privacy Notice [here](#).

Information We Obtain

Information You Provide

When you apply for a position within the Agency, you will be asked to provide certain Personal Information, such as:

- Your name and contact information;
- Your education and employment history;
- Your work skills; your desired work location;
- Work authorization status;
- Military veteran status;
- Username and password;
- Personal Information you may provide in documents you upload such as cover letters, portfolios, CVs and résumés;
- References; and
- Any other information you choose to provide to us (e.g., employment preferences, current and desired salary, awards or professional memberships).

"Personal Information" is information that identifies you as an individual or relates to an identifiable individual.

Additionally, depending upon your location or the location of the job, we may request additional information about you (e.g., in the United States we request gender, race and ethnicity as optional self-identification information which is used for Equal Employment Opportunity ("EEO") reporting) or there may be an opportunity for you to provide on a voluntary basis other self-identification information. We will do so only where permitted by law. Otherwise, we ask you avoid submitting information that may qualify as sensitive information under applicable law, except where such information is legally required. If you opt to provide race, ethnicity origin, religion and disability data, we will use this information for diversity monitoring and reporting purposes and we will not use it in the recruitment and selection process.

Any information you submit through the Site must be true, complete and not misleading. Submitting inaccurate, incomplete, or misleading information may lead to a rejection of your application during the application process or disciplinary action, including immediate termination of employment. In addition, it is your responsibility to ensure that information you submit does not violate any third party's rights. If you provide us with Personal Information of a reference or any other individual as part of your application, it is your responsibility to obtain consent from that individual prior to providing the information to us.

Information from Other Sources

For the purpose of background check reports in connection with your application, and as permitted by applicable law, Agency obtains information about you from other sources.

Other sources include:

- Your references;
- Prior employers; and
- Educational institutions you attended.

Automated Collection of Data

When you use the Site, we may obtain certain information by automated means, such as browser cookies, beacons, device identifiers, server logs, and other technologies. The information we obtain in this manner may include your device IP address, domain name, identifiers associated with your devices, device and operating system type and characteristics, web browser characteristics, language preferences, clickstream data, your interactions with the Site (such as the web pages you visit, links you click, and features you use), the pages that led or referred you to the Site, dates and times of access to the Site, and other information about your use of the Site.

A "cookie" is a text file that websites send to a visitor's computer or other Internet-connected device to uniquely identify the visitor's browser or to store information or settings in the browser. Cookie technology holds information a site may need to personalize a visitor's experience. Cookies may also be used for security purposes.

You can stop certain types of cookies from being downloaded on your computer by selecting the appropriate settings on your web browser. Most web browsers will tell you how to stop accepting new browser cookies, how to be notified when you receive a new browser cookie, and how to disable existing cookies. You can find out how to do this for your particular browser by clicking "help" on your browser's menu or by visiting www.allaboutcookies.org. The Site is not designed to respond to "do not track" signals received from browsers. Please note that, without cookies or other automated tools, you may not be able to use all of the features of the Site.

We may also use Adobe Flash technology, including Flash Local Shared Objects ("Flash LSOs") to collect and store information about your use of the Site. If you do not want Flash LSOs stored on your computer, you can adjust the settings of your Flash player to block Flash LSO storage using the tools contained in the [Website Storage Settings Panel](#). You can also go to the [Global Storage Settings Panel](#) and follow the instructions. Please note that setting the Flash Player to restrict or limit acceptance of Flash LSOs may reduce or impede the functionality of some Flash applications.

These technologies help us (1) track and understand how you use and interact with the Site; (2) measure the usability of the Site; (3) understand the effectiveness of our communications; and (4) otherwise manage and enhance the functionality of the Site. We may use the information

collected through these technologies for any purpose, except where we are required to do otherwise under applicable law. If we are required to treat such information as Personal Information under applicable law, then we may use and disclose such information for the purposes for which we use and disclose Personal Information, as detailed in this Privacy Notice.

Third-Party Web Analytics Services

We use third-party online analytics services, such as Google Analytics. The service providers that administer these analytics services use cookies and similar technologies to collect and analyze information about use of the Site and report on activities and trends and diagnose technical issues. To learn more about Google's practices, please visit www.google.com/policies/privacy/partners/, and opt out of them by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>.

How We Use Personal Information

We collect and process information about you for one or more of these reasons:

- a) Because you voluntarily provide this information and consent for us to process it;
- b) Because this information is necessary to take steps at your request prior to entering into a position with Agency;
- c) Because this information is of particular importance to us and we have a specific legitimate interest under law to process it;
- d) To comply with a legal obligation; or
- e) Where necessary to protect the vital interests of any person.

Where the collection or processing is based on your consent, you may withdraw your consent at any time to the extent permitted by applicable law.

The Personal Information we obtain on the Site will be used for Agency's global personnel recruitment, management, and planning purposes, as permitted by applicable law.

- To evaluate and assess your experience and qualifications as they relate to specific requirements for the position for which you applied,

and possibly to determine whether you would be suitable for other positions within Agency or its affiliates. We will engage in these activities to manage our prospective contractual relationship with you, based on our legitimate interests.

- To create and manage your account. We will engage in these activities to manage our prospective contractual relationship with you, based on our legitimate interests.
- To respond to and communicate with you about your requests, questions, and comments. We will engage in these activities to manage our prospective contractual relationship with you.
- To protect against, identify, and prevent fraud, unauthorized access, security breaches, and other criminal activity and risks. We will engage in these data protection activities to comply with a legal obligation and/or because we have a legitimate interest.
- To comply with, monitor compliance with, and enforce applicable legal requirements, relevant industry standards, and our policies, including this Privacy Notice and/or Agency's Terms and Conditions. We will engage in these activities to comply with a legal obligation and/or because we have a legitimate interest.
- To conduct background checks if we offer you a position. We will engage in these activities to comply with a legal obligation or based on our legitimate interests.
- To preserve our other legitimate interests, for example, for Agency's administrative purposes, aggregate management reporting, internal training, and as generally required to conduct our business within Agency and its affiliates.
- To aggregate and/or anonymize Personal Information so that it will no longer be considered Personal Information. We do so to generate other data for our use, which we may use and disclose for any purpose.

The information about you will be added to Agency's international candidate database and can be retained and used to consider you for opportunities at Agency and its affiliates other than the one(s) for which you apply. If you do not wish us to do this, please contact us at the address in the "Contact Us" section below.

If we hire you, Personal Information we collect in connection with your application can be incorporated into our human resources system and used to manage the new-hire process; any such information can become part of your employee file and used for other employment-related purposes.

Providing Personal Information to us through the Site is voluntary. However, if you do not provide sufficient information, Agency may be unable to consider your employment application or, if you are hired, your subsequent promotion, transfer, or relocation.

Personal Information Sharing

We share your Personal Information with:

- Our service providers who perform services on our behalf, such as recruitment agencies and salary evaluators who may be working with Agency for the purposes of evaluating candidates for employment opportunities, as well as service providers who perform reporting and analytics for Agency, help us administer this website, or assist our online recruiting process (such as our internet service providers). We do not authorize our service providers to use or disclose the information except as necessary to perform services on our behalf or comply with legal requirements.

In addition, if you supply references to support your employment application, we may contact these individuals to help us evaluate you for employment opportunities at Agency. Doing so will necessarily involve a limited disclosure of your Personal Information to those individuals, such as your name, the fact you have submitted an application to Agency for employment and that you are interested in a certain type of position at Agency.

We also may disclose information about you (1) if we are required to do so by law or legal process (such as a court order or subpoena), including laws outside your country of residence; (2) in response to requests by, or cooperate with, government agencies, such as law enforcement authorities, including outside of your country of residence; (3) to establish, exercise, or defend our legal rights; (4) when we believe disclosure is necessary or appropriate to protect our rights, privacy, safety, or property and/or that of our affiliates, you, or others; (5) in connection with an investigation of suspected or actual illegal activity; (6) in connection with the sale or transfer all or a portion of our business, assets, or stock (including in the event of a reorganization, dissolution, or liquidation); or (7) otherwise with your consent.

Cross-Border Transfer

Your Personal Information may be processed and stored in any country where we have facilities or in which we engage service providers, and you understand your Personal Information may be transferred to countries outside of your country of residence, including the United States, which may have data protection rules that are different from those of your country. In certain circumstances, courts, law enforcement agencies, regulatory agencies, or security authorities in those other countries may be entitled to access your Personal Information.

The Site is not intended for distribution to, or use by, any person or entity in any jurisdiction or country where such distribution or use would be contrary to local law or regulation.

ADDITIONAL INFORMATION REGARDING THE EUROPEAN ECONOMIC AREA ("EEA"): Some non-EEA countries are recognized by the European Commission as providing an adequate level of data protection according to EEA standards (the full list of these countries is available [here](#)). For transfers from the EEA to countries not considered adequate by the European Commission, we have put in place adequate measures, such as standard contractual clauses adopted by the European Commission to protect your Personal Information. You may obtain a copy of these measures [here](#).

Your Rights and Choices

If you register on the Site, you may access, review, and change your Personal Information stored therein by logging into the Site and updating your account information. The updated profile will be used as the default the next time you apply for a job using your account online. To change Personal Information you have already submitted for consideration for a specific position, please update your profile and resubmit your application for that position. We encourage you to promptly update your Personal Information if it changes or is inaccurate.

We offer you certain choices in connection with the Personal Information we obtain about you. If you would like to request to review, correct, update, suppress, restrict, or delete Personal Information, to object to the processing of Personal Information, or to receive an electronic copy of your Personal Information (to the extent these rights are provided to you by applicable law), please contact us as specified in the How to Contact Us section of this Privacy Notice. We will respond to your request consistent

with applicable law.

In your request, please make clear what Personal Information you would like to access or have changed, whether you would like to have Personal Information you have provided to us suppressed from our database.

To help protect your privacy and maintain security, we only process requests with respect to the information associated with the particular email address you use to send us your request, and we may take steps to verify your identity before granting you access to your Personal Information. To the extent permitted by applicable law, a charge may apply before we provide you with a copy of any of your Personal Information that we maintain.

Other Online Services and Third-Party Features

Our Careers site may provide links to other online services and websites for your convenience and information, and may include third-party features such as apps, tools, widgets, and plug-ins (e.g., LinkedIn, Instagram, Facebook, and Twitter buttons). These services and websites may operate independently from us. The privacy practices of these third parties, including details on the information they may collect about you, are subject to their own privacy statements. To the extent any linked online services or third-party features are not owned or controlled by us, Agency is not responsible for these third parties' information collection, usage or other practices.

Retention of Personal Information

We retain Personal Information for as long as needed or permitted in light of the purposes for which we obtained it and consistent with applicable law. This means we may retain your Personal Information for as long as is reasonably necessary for your employment application, including to contact you should a suitable job opening occur in the future, in light of our legitimate interest of staffing open positions. The criteria used to determine our retention periods include:

- The duration of the application process;
- The length of time we have an ongoing relationship with you;
- Whether there is a legal obligation to which we are subject; and

- Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitation, litigation, or regulatory investigations).

We may remove Personal Information for inactive accounts from our database, subject to any applicable legal or regulatory obligations. Furthermore, Agency can delete Personal Information about you (including your CV/résumé) from our database at any time and without providing any reason. Therefore, please retain your own copy of the Personal Information provided to us.

How We Protect Personal Information

We seek to use reasonable administrative, technical and physical safeguards designed to protect Personal Information within our organization. If you have reason to believe your interaction with us is no longer secure, please immediately notify us in accordance with the [How to Contact Us](#) section of this Privacy Notice.

Agency hereby disclaims, as far as permitted by local laws, any liability for itself and its affiliates and contractors for any Personal Information we collect in connection with your application that is lost, misused, illegally accessed, disclosed, altered or destroyed or not timely delivered to our Site.

Law Applicable to Job Application

The Site allows you to apply for jobs world-wide, as a benefit of Agency's centralized global recruitment function. This Site is operated from the United States. Accordingly, any Personal Information you submit to the Site will be collected in the United States and will be subject to U.S. laws. However, if we share your Personal Information with an affiliate located in another country in its capacity as a potential employer, the affiliate will handle your Personal Information in accordance with this Policy. Any hiring or other employment-related decisions will be made by the hiring affiliate in accordance with the laws of the country where the job will be located.

Children's Personal Information

The Site is designed for a general audience and is not directed to children under the age of 16. Agency does not knowingly collect or solicit Personal Information from children under the age of 16 through the Site. If you

believe that a child under the age of 16 may have provided us with Personal Information through the Site, please contact us as specified in the [How to Contact Us](#) of this Privacy Notice.

Updates to Our Privacy Notice

This Privacy Notice may be updated periodically and without prior notice to you to reflect changes in our Personal Information practices. We will indicate at the top of the notice when it was most recently updated. Any changes will become effective when we post the revised Privacy Notice on the Site.

How to Contact Us

FCB Worldwide Inc, located at 100 West 33rd Street, New York, N.Y. 10001-2900, is the company responsible for collection, use, and disclosure of your Personal Information under this Privacy Notice.

To contact us in relation to this Privacy Notice or any privacy matter, including our use of your Personal Information or to exercise other applicable privacy rights, please use the following contact details:

ATTN: Information Security Compliance Manager
mb.datasecurity@fcb.com

Because email communications are not always secure, please do not include sensitive information in your emails to us.

Additional Information Regarding the EEA

Our EU/UK Data Protection Officer ("DPO") may be contacted via email using the following details:

EU/UK DPO

Interpublic Group Limited

For the UK: UK.DPO@interpublic.com

For the EU: GDPR.DPO@interpublic.com

You have the right to lodge a complaint with a data protection authority for your country or region or where an alleged infringement of applicable data protection law occurs. A list of data protection authorities is available [here](#).