

WPP Data Code of Conduct

GroupM and its agencies are committed to responsible collection, management, use and protection of data. GroupM and its agencies recognise their obligations to all stakeholders including share owners, clients, their own people, suppliers and consumers. GroupM and its agencies work with many categories of data and use the term 'data' in its broadest sense. We include within this definition client data, consumer data and all information and data related to the operation of our businesses.

GroupM and its agencies operate in many markets and countries throughout the world. In all instances, we respect national privacy laws and laws with an international reach, such as the General Data Protection Regulation "GDPR". Our commitment in respect of data privacy is recorded in the WPP Data Code of Conduct.

Our Practices

We will be transparent with consumers.

We will treat data in accordance with all applicable laws, regulations, and treaties.

We will implement fair and reasonable data policies and procedures.

We will treat data as confidential.

We will understand not only what data we hold but also its relevance to stakeholders.

We will collect, secure, process, use and store data appropriately.

We will ensure that data is retained appropriately.

We will implement necessary and appropriate technical measures to secure data.

We will delete data when required to do so.

We will ensure our people understand their role in upholding these principles and practices.

Your Commitment

The defined terms Personal Data, Controller and Processor below have the meanings defined by GDPR (or their equivalent as defined any local law).

If Supplier; (A) provides Personal Data to, or (B) processes Personal Data for, GroupM and its agencies and/or their respective clients we will ask you to complete a Data Privacy and IT Security Self-Assessment. If you fall into either category of supplier and have not received such a Self-Assessment form, please request one immediately. **For providers of data we cannot receive or ingest any personal data and, for suppliers in both categories, no invoices will be cleared for payment unless such an assessment in respect of the specific data product or service has been completed and approved by GroupM.**

If you are a Processor of Personal Data in respect of which GroupM and its agencies and/or their respective clients are a Data Controller we may ask you to agree a separate Data Processing Agreement in addition to this Code of Conduct.

We expect and require all our business partners, whether or not providing or processing any data, to have a commitment to data privacy and confidentiality within their businesses equivalent to our stated practices and therefore ask all suppliers to confirm that commitment as set out below.

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Your Confirmation

I am authorised to provide the confirmation below on behalf of the Supplier:

- A. Supplier will abide by equivalent practices in respect of data to those set out above in the WPP Data Code of Conduct; **AND/OR** Supplier has in place its own written Data Code of Conduct applicable to its use of data and will provide a copy to GroupM and its agencies and/or their respective clients, upon request.
- B. Supplier will comply at all times with applicable national privacy laws and laws with an international reach (such as the General Data Protection Regulation “GDPR”).
- C. If Supplier becomes aware of any data breaches which affect data provided to or received from GroupM and its agencies or their clients or become aware of any other data matters that could harm GroupM, its agencies or their clients’ reputation, directly or by association, we will inform you as soon as possible and within any statutory notification periods.

Name Signature

Position Date

Supplier [*INSERT FULL LEGAL ENTITY NAME*].....