

# Privacy Notice

How and why we collect data and covering your choices.

(last update, 21 jun 2018)

## Who are we?

Wavemaker Global Limited (“**Wavemaker**”), is a global media investment business and is a part of GroupM Worldwide, Inc. In the European Economic Area (EEA) and Switzerland the Wavemaker legal entity responsible for the data that Wavemaker collects is Wavemaker Global Limited. Outside of the EEA and Switzerland the responsible legal entity is Wavemaker Global LLC.

This notice outlines how and why Wavemaker collects and uses personal data specifically from visits to the Wavemaker websites (“**Website**”): [www.wavemakerglobal.com](http://www.wavemakerglobal.com) and any related or affiliated sites, for example country-level sites such as [www.wavemakerglobal.com/en-gb](http://www.wavemakerglobal.com/en-gb)

This notice also explains your rights as someone who may provide personal data to Wavemaker through the Websites and how to exercise these rights. If you are an individual residing in the EEA or Switzerland you should be aware that our DPO can be contacted at [DPO@GroupM.com](mailto:DPO@GroupM.com).

We respect the privacy of users of our website and recognise that when you choose to provide us with information about yourself, you trust us to act in a responsible manner with that information. This privacy policy contains important information about how we use your personal information.

## What information is collected and used by Wavemaker?

We collect information that enables us to identify your browser and device and tell us which pages within our Website you visit and on which pages you spend the most time. We do this by using the following:

**Cookie** - a small alphanumeric text file that we automatically assign to visitors to our website. It is stored in your browser and allows us to identify your interaction with us. Sometimes a cookie resides on your device for just the single time you're visiting our Website; this is called a session cookie. Sometimes a cookie remains on your

device until you delete it or it expires automatically; this is called a persistent cookie. Both types of cookies are used on our Websites.

**IP address** - Internet protocol address

**Pixel** - a line of code that sits within our webpages and which we use to record that you have visited a particular page within our Websites.

We use some or all of this information to improve your website experience by delivering content that you are likely to prefer on future visits. Our lawful basis for this type of processing is that we have a legitimate interest in understanding and improving your experience of our Website. If you don't agree to us using cookies and the above information, you may prevent their use through your browser settings. By choosing not to accept cookies, certain Website features may not work as we have intended.

### **Specific cookie types used**

**Performance Analytics Tracking** - This type of cookie provides aggregated information about where a user may go on the Website.

**Google Analytics (persistence)** - Wavemaker uses Google Analytics to help analyse how visitors use the Website. Among other things, Google Analytics uses cookies to collect information about the number of visits to the Website, the webpage that referred visitors to the Website, language, device, browser and operating system, the pages visitors view within the Website and other similar details. We do not share this information with third parties. When used this way the Google Analytics cookie is a persistent cookie, and will remain on your device until the cookie expires or you delete it. These cookies may appear as `_unam`, `_gid`, `_ga`, `_sharethis_cookie_test`.

**Google Analytics (session)** - This cookie may appear as PHPSESSID. We do not retain this data as it is deleted upon closing of your browser, and therefore we cannot share it with any third parties.

**Social media/ Social Sharing** - These are cookies that help with the Website's functionality. These are third party cookies and they allow you to share comments, pages, bookmarks and likes and help to provide access to social networking tools easily.

Social media widgets used on this Website include LinkedIn, Twitter, Facebook and Instagram. These social media widgets collect information about your visit to the Website and your use of the social platform services (for example, buttons or likes) on the Website. We do not share information with these social platforms, however please keep in mind the social networks collect the data of your site visit and interaction with the social widget directly.

### **Collection and use of contact information**

There are a few instances where we may collect your name and contact details (such as e-mail address, telephone number and postal address). But, we won't collect this information without consent and never use it in online advertising placement. We keep a record of this information, including email address and other contact information, solely for responding to a user's request. Examples where you might voluntarily provide your name and contact details include:

If you click on the "contact us" link and submit a question or comment, we will collect your name, e-mail address, and phone number in order to send you a reply.

If you voluntarily ask to be added to our newsletter list, we will collect your e-mail address to send you our email newsletter or marketing emails.

If you submit information in connection with an employment inquiry.

To provide you with better ways of accessing information from this website.

If you enter information into a text field or otherwise submit information to us on the Website.

By entering your contact information as noted above you are consenting to Wavemaker using that information to contact you regarding your request. This consent is our legal basis for using the information in this way.

Wavemaker may pass your contact information to our subsidiaries and affiliated companies so that they may contact you in connection with the objective of your inquiry for the purposes set out in this policy. Where we pass your contact information to our subsidiary or affiliated companies in another country, we will make sure that they apply the same level of protection to your information as we do.

If at any time you decide to withdraw your consent and like would us to remove you from our marketing e-mails or newsletters, or to unsubscribe from our database, you can contact us using the details provided at the bottom of this Privacy Notice. You must include your name, e-mail address, and clear instructions regarding changes you are requesting. You may also unsubscribe from e-mail newsletters by clicking on the "unsubscribe" link found at the bottom of the e-mail.

Wavemaker is a data controller responsible for your personal data (as this term or similar term is defined by applicable law) when you visit our Website or provide us with contact information.

## **California**

Pursuant to Section 1798.83 of the California Civil Code, residents of California can obtain certain information about the types of personal information that companies with whom they have an established business relationship have shared with third parties for direct marketing purposes during the preceding calendar year. To request a list of companies, if any, to which Wavemaker has provided personal information for its own marketing purposes, please email us at [DPO@groupm.com](mailto:DPO@groupm.com) . Please allow 30 days for a response.

## **Frequently Asked Questions**

**Does Wavemaker share any information with other vendors or partners?:**

We may provide access to information we collect to our vendors and contractors (also known as third parties) who are performing services on our behalf to enable the uses of your information that we have described above. These vendors are not permitted to use this information for any other purpose. As noted above the Website uses social media widgets including but not limited to, Facebook, Instagram, Twitter and LinkedIn so users can easily share information about their visits with “likes” or “shares.” Always review the privacy policy of social media sites as their data collection practices are separate from Wavemaker practices. Additionally, we must disclose information when we believe we’re legally obliged to, or in order to investigate, prevent, or take action regarding prohibited activities, such as incidents of hacking, misuse, suspected fraud, or other prohibited activities.

**Does Wavemaker transfer your personal data outside the European Union?:**

If you provide us with personal data, we may transfer that personal data to our affiliates and subsidiaries or to other third parties, across borders, and from your country or jurisdiction to other countries or jurisdictions around the world to enable us to use that personal data as described above. Our standard practice is to use European Union model clauses for the transfer of data from the EEA & Switzerland to other non-EEA countries.

**Use of this site by Children and Children's data:**

Our Website is not developed for or directed at children under age 13. We specifically request that children not provide information about themselves through our Website. If you believe your child has provided this kind of information and would like it deleted from our database, you can contact us at [DPO@groupm.com](mailto:DPO@groupm.com) . If we become aware that we have collected information about a child under the age of 13, we will delete it.

**Data retention and storage:**

We will keep your information that we collect on the Website for a reasonable period for the purposes set out above. We follow generally accepted online advertising industry standards to ensure that your personal data disclosed to us is kept secure, accurate and up to date and kept only for so long as is necessary for the purposes for which it is used. These standards include undertaking necessary physical, electronic, and management activities required to protect data integrity, access, and use.

**Information Security:**

Maintaining the privacy of our users' information is very important to us which means we take care and pay special attention to our security measures to protect this information from data breaches. We follow industry standards to protect against the unauthorized access to, retention of, and disclosure of information. This includes physical, electronic, and management activities to protect information integrity, access, and use.

**Linking to other websites/Third party sites:**

A link from our Website to another website does not imply our endorsement of affiliates or websites, and we do not control third party websites to which we link, nor assume responsibility for their content or privacy policies. Once you follow a link to another website, the Wavemaker Privacy Notice no longer applies. It's important to always read the privacy policy of any website you are visiting.

**Transfer of data upon change of control:**

In the event that another company acquires us, or all or substantially all of the assets of our business, through a consolidation, merger, asset purchase, or other transaction, we reserve the right to transfer all information (including any information you may have provided through the "contact us" page) that is in our possession or under our control to the acquiring party, and that information may be used by the acquiring party in its business.

**Data Subject Rights of individuals in the EEA and Switzerland:**

You have the right to access, update, change, delete, restrict the use of, or obtain a copy of your personal data in an easily readable format. In certain circumstances, you may also request that Wavemaker transfer your Personal Data to a third party, and the right to object to its use for marketing purposes. If you wish to exercise any of these rights please contact our DPO at [DPO@GroupM.com](mailto:DPO@GroupM.com). Where our processing of your personal data is based on your consent, you also have the right to withdraw this consent at any time by contacting our DPO at [DPO@GroupM.com](mailto:DPO@GroupM.com). Please note that your withdrawal of consent will not affect the lawfulness of our processing of your personal data prior to withdrawal of consent.

**Changes to this Privacy Notice:**

Please note that because of the changing nature of privacy laws and regulations, digital technologies, and our business, we may modify this Privacy Notice from time to time. Please review this Privacy Notice periodically to become aware of any changes that may have occurred (we will update the effective date at the top of the page to help you know when changes have been made).

**If you have any Complaints or wish to contact us:**

Please use the details set out below depending on where you are located and we will do our best to address any complaints or worries you may have about how we collect and handle your personal data.

If for whatever reason you don't feel like we have adequately addressed your concerns you can contact the Data Protection Authority in your jurisdiction and make a formal complaint.

**Europe:**

[DPO@GroupM.com](mailto:DPO@GroupM.com)

Wavemaker Global Limited, 18 Upper Ground, South Bank, London SE1 9ET – Attn: Global Legal Director

**Outside Europe:**

Wavemaker Global LLC - 825 7th Avenue, New York, NY, 10018, USA - Attn: Director of Privacy

**Imprint:**

Wavemaker Hungary Kft.

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