

Omnicom Group Inc.: Swiss Safe Harbor Privacy Policy

Effective date: **September 23, 2016**

Omnicom Group Inc. and its subsidiaries Omnicom Management Inc. and Omnicom Capital Inc. (collectively, “Omnicom Group”) respect your concerns about privacy. Omnicom Group has certified that it abides by the Safe Harbor privacy principles as set forth by the U.S. Department of Commerce regarding the collection, storage, use, transfer and other processing of human resources (“HR”) and Suppliers’ (as defined below) representatives Personal Data (as defined below) transferred from Switzerland to the United States. This Policy describes how we implement the Safe Harbor privacy principles with respect to the relevant Personal Data.

For purposes of this policy:

“Employee” means any current, former or prospective employee, temporary worker, intern or other non-permanent employee of any subsidiary or affiliate of Omnicom Group who is located in Switzerland.

“Personal Data” means any information, including Sensitive Personal Data, that (i) is transferred to Omnicom Group in the U.S. from Switzerland, (ii) is recorded in any form, (iii) relates to an identified or identifiable Employee or Supplier’s representative, and (iv) can be linked to that Employee or Supplier’s representative.

“Sensitive Personal Data” means Personal Data specifying medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, sex life, the commission or alleged commission of any offense, any proceedings for any offense committed or alleged to have been committed by the individual or the disposal of such proceedings, or the sentence of any court in such proceedings.

“Supplier” means any supplier, vendor or other third party located in Switzerland that provides services or products to Omnicom Group.

Omnicom Group’s Safe Harbor certification can be found at <https://safeharbor.export.gov/list.aspx>. For more information about the Safe Harbor principles, please visit <http://www.export.gov/safeharbor>.

How Omnicom Group Obtains Personal Data

Omnicom Group may obtain and process certain Personal Data about Employees in connection with their employment or other working relationship with Omnicom Group. This Personal Data includes information such as:

- Name
- Contact information
- Date of birth
- Government-issued identification information, passport or visa information
- Educational history
- Employment history
- Information about job performance and compensation, and
- Financial account information.

Omnicom Group processes this Employee Personal Data when carrying out and supporting HR functions and activities, including:

- Recruiting and hiring job applicants
- Managing Employee communications and relations
- Providing compensation and benefits
- Administering payroll
- Processing corporate expenses and reimbursements
- Managing Employee participation in human resources plans and programs
- Carrying out obligations under employment contracts
- Managing Employee performance
- Conducting training and talent development
- Facilitating Employee relocations and international assignments
- Managing Employee headcount and office allocation
- Managing the Employee termination process
- Managing information technology and communications systems, such as the corporate email system and company directory
- Conducting ethics and disciplinary investigations
- Administering Employee grievances and claims
- Managing audit and compliance matters
- Complying with applicable legal obligations, including government reporting and specific local law requirements, and
- For other general human resources purposes.

Omnicom Group also may obtain and process Personal Data about Employees' emergency contacts and other individuals (such as spouse, family members, dependents and beneficiaries) to the extent our Employees provide the information to us. We process this information to comply with our legal obligations and for benefits administration and other internal administrative purposes.

In addition, Omnicom Group obtains Personal Data associated with its Suppliers' representatives. This information may include contact information and financial account information of the Suppliers' representatives. Omnicom Group uses this information to manage its relationships with its Suppliers, process payments, expenses and reimbursements, and carry out Omnicom Group's obligations under its contracts with the Suppliers.

Omnicom Group's practices regarding the collection, storage, use, transfer, and other processing of Personal Data comply, as appropriate, with the Safe Harbor principles of notice, choice, onward transfer, access, security, data integrity, and enforcement and oversight.

Notice

Through this Swiss Safe Harbor Privacy Policy, Omnicom Group notifies Employees and Suppliers' representatives about the purposes for which it collects and uses their Personal Data, the types of third parties to whom Omnicom Group discloses the Personal Data, the choices relevant individuals have for limiting the use and disclosure of their Personal Data, and how to contact Omnicom Group about the company's practices concerning Personal Data.

Relevant information also may be found in privacy notices pertaining to specific data processing activities.

Choice

Omnicom Group may disclose Personal Data without offering an opportunity to opt out (i) to service providers the company has retained to perform services on its behalf, (ii) to other Omnicom Group group companies performing services on its behalf, (iii) if it is required to do so by law or legal process, (iv) to law enforcement or other government authorities, or (v) when Omnicom Group believes disclosure is necessary to prevent physical harm or financial loss, or in connection with an investigation of suspected or actual illegal activity. Omnicom Group also reserves the right to transfer Personal Data in the event it sells or transfers all or a portion of its business or assets (including in the event of a reorganization, dissolution or liquidation). Omnicom Group uses Personal Data only for the purposes indicated in this Policy unless it has a legal basis, such as consent, to use it for other purposes. To the extent required by law, Omnicom Group obtains prior opt-in consent at the time of collection from Employees for the processing of Sensitive Personal Data.

Onward Transfer of Personal Data

Omnicom Group may share Personal Data with third parties as indicated in the “Choice” section above. Except as permitted or required by applicable law, Omnicom Group requires third parties to whom it discloses Personal Data and who are not subject to the European Union Data Protection Directive 95/46 or an adequacy finding to either (i) subscribe to the relevant Safe Harbor principles or (ii) contractually agree to provide at least the same level of protection for Personal Data as is required by the relevant Safe Harbor principles.

Access

Where appropriate, Omnicom Group provides Employees and Suppliers’ representatives with reasonable access to the Personal Data Omnicom Group maintains about them. Omnicom Group also provides a reasonable opportunity for Employees and Suppliers’ representatives to correct, amend or delete that information where it is inaccurate, as appropriate. Omnicom Group may limit or deny access to Personal Data where providing such access is unreasonably burdensome or expensive under the circumstances, or as otherwise permitted by the Safe Harbor principles. The right to access Personal Data also may be limited in some circumstances by local law requirements.

Security

Omnicom Group takes reasonable precautions to protect Personal Data from loss, misuse and unauthorized access, disclosure, alteration and destruction.

Data Integrity

Omnicom Group takes reasonable steps to ensure that the Personal Data the company processes is (i) relevant for the purposes for which the Personal Data is to be used, (ii) reliable for its intended use, and (iii) accurate, complete and current. In this regard, Omnicom Group depends on Employees and Suppliers’ representatives to update and correct their Personal Data to the

extent necessary for the purposes for which the information was collected or subsequently authorized by the individuals.

Enforcement and Oversight

Omnicom Group has established procedures for periodically verifying implementation of and compliance with the Safe Harbor principles. Omnicom Group conducts an annual self-assessment of its Personal Data practices to verify that the attestations and assertions the company makes about its privacy practices are true and that the company's privacy practices have been implemented as represented.

Employees and Suppliers' representatives may file a complaint concerning Omnicom Group's processing of their Personal Data with the Corporate Legal Department, whose contact information is below. Omnicom Group will take steps to remedy any issues arising out of a failure to comply with the Safe Harbor principles.

If an Employee's complaint cannot be resolved through Omnicom Group's internal processes, Omnicom Group will cooperate with the Swiss data protection authority.

If a Supplier's representative complaint cannot be resolved through Omnicom Group's internal processes, Omnicom Group will cooperate with JAMS in accordance with the JAMS Safe Harbor Program, which is described on the JAMS website at <http://www.jamsadr.com/safeharbor/>. JAMS or the Supplier's representative may also refer the matter to the U.S. Federal Trade Commission, which has Safe Harbor enforcement jurisdiction over Omnicom Group.

How to Contact Omnicom Group

For questions or concerns about this Swiss Safe Harbor Privacy Policy, please send an email to safeharbor@omnicomgroup.com or contact our Corporate Legal Department at:

Omnicom Group Inc.
Attention: Corporate Legal Department
437 Madison Ave.
New York, NY 10022