

Privacy Notice

Effective date: August 1, 2016

Welcome to JCDecaux North America! This Privacy Notice describes the practices of JCDecaux North America, Inc. ("JCDecaux", "we", "us", or "our") regarding the collection and use of information about individuals who visit our website located at www.jcdecauxna.com (<http://jcdecauxna.com>) ("Site") or who view the content available on the Site or in our publications, or interact with us, through emails or otherwise (collectively, "Service").

This Privacy Notice is part of, and is governed by, the terms and conditions set forth in our [Terms and Conditions](http://jcdecauxna.com/company/terms-and-conditions) (<http://jcdecauxna.com/company/terms-and-conditions>).

This Privacy Notice does not apply to the information that we may collect as part of our out-of-home advertising business when we provide services to our business customers. These activities are governed by the Privacy Policy for JCDecaux Digital Advertising Services.

1. Consent to Privacy Notice

In this Privacy Notice, we describe the information we collect when an individual ("user" or "you") uses or accesses our Site or interacts with us. By accessing or using this Site or interacting with us, you consent to the information collection, disclosure and use practices described in this Privacy Notice.

You should ensure that you read this Privacy Notice carefully. We may also change this Privacy Notice from time to time as explained in the "Changes" section. If you do not agree with the terms of our Privacy Notice, please do not access or use the Site or communicate with us.

2. Changes to our Privacy Notice

We may update our Privacy Notice from time to time. If we make any material changes to the Privacy Notice, we will prominently post the notice of the changes and the updated Privacy Notice on this Webpage, along with its effective date, and notify users as required by law.

If you do not agree with the proposed changes, you should discontinue your use of Services prior to the time the new Privacy Notice takes effect. Your continued use of the Service after we have posted changes to the Privacy Notice will indicate that you agree to be bound by such changes.

3. Children's Privacy

This Site is a general audience service. Our content is not directed towards minors or children under the age of 13. We do not knowingly collect personal information from children under the age of 13. If we become aware that a minor or a child under the age of 13 has provided us with personal information without parental consent, that information will be deleted. Parents who have questions about personal information that may have been submitted by a child under the age of 13 should [Contact Us](http://jcdecauxna.com/contact) (<http://jcdecauxna.com/contact>).

By accessing and/or using the Site you represent that you are at least 13 years old.

4. Information We Collect

We collect information from you when you access and interact with the Site or the Service. We collect both personal information and non-personal information depending on your level of interaction with the Service. The manner in which this information is collected falls into two categories:

(i) Information you provide to us directly:

- *Electronic Communications:* We may collect information that you choose to share with us via electronic communications, such as support or administrative requests. We use this information to understand and respond to your questions.
- *Surveys and Questionnaires:* We may invite you to participate in surveys or to respond to a particular questionnaire. Participation in such surveys and questionnaires is voluntary. If you do decide to participate, we may request certain personal information from you, such as your name, email address or zip code. We will use this information for analytics purposes.

(ii) Information automatically collected through your use of the Site:

We automatically collect information from your device when you use our Site. This may include:

- *Device Information and Browsing Information:* We record your IP address, the time of your visit to the Site, and information regarding the browser and operating system that you use. We collect certain information about how you use the Site or Service, which may include information on when and how you interact with the Site and the actions you take on the Site, the pages you visit, the links on which you click, or whether you open our emails.
- *Mobile Device Users:* When you access the Site via your mobile device we collect information about your device, such as the type of device you use, your device's unique device ID, the IP address of your device, your device's operating system and the type of browser you use. In addition, we may be able to identify the location of your mobile device. You may choose not to share your location details with us by making the necessary adjustments to your device's location services setting.

The technology we use to collection information automatically from users includes the following:

- *Cookies:* We use cookies to identify a returning user, identify the pages visited that by user, facilitate a user's log-in, as navigation aids, and as session timers. We also use the information collected through cookies in the aggregate, to understand how many users are using our Service and to determine for what purposes they are using the Service.

You may choose to block certain categories of cookies. Most browsers contain information on how to control or delete cookies. These settings will typically be found in the "options" or "preferences" menu of your browser. Please note that blocking or disabling certain cookies may interfere with certain functionalities of our Service. Further, while disabling a cookie may prevent the future collection of information, it does not prevent the use of the information collected prior to the cookie being disabled. For more general information about cookies you can visit <http://www.allaboutcookies.org> (<http://www.allaboutcookies.org>).

- *Web Beacons:* Web beacons are small graphics with a unique identifier that are embedded in the webpages you access, and are used to track the online activity of a user. We may use web beacons to help us understand users interest in our Service and to serve you advertising based on our perception of your interests.
- *Embedded Scripts:* We may also use embedded scripts to collect information about a user's interaction with the Site, such as on which links the user clicks. An embedded script is a code that is temporarily downloaded onto the user's device and is deactivated or deleted when the user disconnects from the Site.
- *Third Parties' Use of Cookies and Web Beacon:* Our Site includes third party content. These third parties may use their own cookies and other technologies to track the actions of users online over time and across different websites or platforms to deliver targeted electronic advertisements to a user. Please note that JCDecaux does not have access to or control over the privacy practices of these third parties, or the technologies that these third parties may use. We are not responsible for the privacy practices of these third parties.

For more information about how tracking works for online advertising purposes you can visit <http://www.aboutads.info/choices> (<http://www.aboutads.info/choices>). In addition, some third party advertising companies may provide a mechanism to opt-out of their tracking technologies. For more information about the opt-out process, you can visit the Network Advertising Initiative website, available at <http://www.networkadvertising.org/choices/> (<http://www.networkadvertising.org/choices/>).

5. How We Use Information

In addition to some of the specific uses that we describe in this Privacy Notice, we may use the information that we have collect to:

- Facilitate your use of the Site;
- Send electronic communications about the Service or to respond to inquiries or requests for information;
- To maintain a record of contact information and correspondence;
- Improve, test, and monitor the effectiveness of Service;
- Develop Site features that may be of interest to you;
- Optimize our marketing efforts, for example to compile statistics regarding the users of the Site, to identify usage trends, and to determine the effectiveness of our promotional campaigns;
- Perform data analysis, audit, fraud monitoring and prevention;
- Conduct other functions as otherwise described at the time when the information is collected; and
- Perform any other function that we believe in good faith is necessary to protect the security or proper functioning of the Site.

6. Sharing and Disclosure of Information

In addition to our use of the information collected for our internal purposes, we may share information about users with third parties in the following circumstances:

1. *Employees, Third-Party Processors and Third-Party Service Providers:* We will share this information with our employees, contractors, affiliates, distributors, dealers, vendors, and suppliers ("Service Providers") who provide certain services to us or on our behalf, such as operating and supporting the Service, conducting data analytics, or performing marketing or consulting services. These Service Providers will only have access to the information needed to perform the functions that we have requested them to carry out on our behalf. Our contracts with these Service Providers prohibit them from using or sharing with others, for purposes other than as directed by us, the information that we provide to them or that they collect directly from our users.

2. *Business Partners:* We may share information with business partners, such as in connection with a joint marketing project. The business partner may use the information in accordance with its own privacy policies over which we have no control.
3. *In Connection with Business Transfers or Bankruptcy:* We may transfer users' information to a third party in case of the sale, merger, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stocks, corporate restructuring or bankruptcy, and as part of the due diligence process with any potential acquiring entity.
4. *Responding to Legal Requests and Preventing Harm:* There may be times when we use, share, or disclose information about a user (a) if required to do so by law, or in response to a search warrant, subpoena, or a court order and we believe that such request is facially valid; (b) if we believe that disclosure is reasonably necessary to protect against suspected illegal or fraudulent activity, to protect the safety, property and other rights of JCDecaux; our service providers, other users or the public; and/or (c) to enforce our Terms and Conditions, or to defend against legal claims, or to allow us to pursue available remedies or limit the damages that we may sustain.
5. *For the Administration of Contests and Promotions:* From time to time, we may offer contests and other promotions for which registration may be required. If you chose to enter a contest or promotion, your personal information may be disclosed to third parties or to the general public in connection with the administration of the contest or promotion, such as in connection with publication of winner selection.
6. *Aggregate and Anonymized Information:* We may share information relating to users of the Service with affiliated or unaffiliated third parties on an anonymous, aggregate basis for research, analytical or strategic purpose. This information is not intended to allow the identification of any specific user of the Service. We require parties with whom we share aggregate information to agree that they will not attempt to re-identify, re-associate, de-aggregate or make this information personally identifiable, for example, by combining it with information from other third party databases.

7. Information Storage and Retention

We will retain information about our users as needed to provide you with the Service, or as necessary to comply with our legal obligations, resolve disputes and enforce our rights or agreements unless a longer retention period is required or permitted under applicable law.

8. Information Security

We use reasonable technical, organizational and administrative measures to protect the information that we collect and store against unauthorized or unlawful processing and against accidental loss, destruction and/or damage. We believe that these measures are reasonably adapted to the nature of the information in our custody. However, as no method of transmission over the Internet, or method of electronic storage is 100% effective, we cannot guarantee and do not warrant the security of any information we may have collected.

9. Users Located Outside the United States - Consent to Transfer

This Site is directed to users located in the United States. Our affiliated entities offer websites located outside the United States. If you reside outside of the United States, and choose to use this Site or our Services or to provide information to us, please be aware that your personal information may be transferred to, processed and maintained on servers or databases located in the United States or in other countries that may have privacy and data protection practices that are not consistent with those in effect in your country.

By accessing and using this Service you consent to our collection and use of your information, as described in this Privacy Notice, outside of your country of residence, including the transfer of your information across international boundaries.

If you do not want your information to be transferred to, or processed or maintained in the United States, you should not access or use the Service.

10. Your Choices About Your Information

If you provide us with information, for example by contacting us through our website, and you do not want us to retain any of your information you can let us know of your election by [contacting us \(http://jcdcauxna.com/contact\)](http://jcdcauxna.com/contact).

11. Links to Other Sites

This Site may contain links to other third party websites or display social networking buttons linking to other third party websites that JCDecaux does not own or control. These links are provided for your convenience only and should be used at your discretion. Links from our Site to third party websites do not constitute sponsorship, endorsement, or approval of the content, policies or practices of such third party websites. JCDecaux is not responsible for the data collection and the privacy practices of these third parties' websites and our Privacy Notice does not apply to information provided to or gathered by the third parties that operate them.

12. California Residents – Your California Privacy Rights

We do not share any personal information about you with outside third-parties for their direct marketing purposes to the extent prohibited by California law, unless you agree otherwise as authorized by your prior written consent. If our practices changes, we will implement new procedures as required by applicable law.

13. How to Contact Us

If you have any questions about this Privacy Notice, please [contact us \(http://jcdcauxna.com/contact\)](http://jcdcauxna.com/contact), via our website; or by mail addressed to JCDecaux North America, Inc. 3 Park Avenue, 33rd Floor, New York, NY 10016, attn: General Counsel.