

17 November 2010

ONLINE MARKETING PRINCIPLES (FOR INTERNAL GUIDANCE)

The aim of these principles is to provide a framework of how to ensure we act responsibly and in the best interest of the Group and our clients when marketing online. These principles can evolve over time subject to client and stakeholder expectations.

I. LVMH ensures that our responsibility standards apply consistently across all platforms and aspects of our online marketing.

EXPLANATION: *For example, we would not apply different standards to mobile advertising than we would apply to internet advertising. However, due to technological restrictions, the precise way of implementing our responsibility standards may depend on the platform in question.*

II. LVMH Maisons commit to provide the client with clear information about and control over their data and how we use it.

COMMENT: For information, this principle corresponds to the minimum required under French law¹.

III. LVMH Maisons don't sell clients' data to third parties.

A. EXPLANATION: *This means that we are not selling clients' data to 3rd parties outside of the LVMH Group. Sharing data within the LVMH Group would be acceptable as long as this is clear to the client (e.g. via privacy policy).*

B. COMMENT: If the client does not wish to share data within the LVMH group, we should make sure that we will comply with his/her request. On a practical standpoint, and as long as technically possible, it may be useful that the brands establish a separate listing for the clients who do not wish to share data in order to facilitate the transfers of data within the group.

IV. LVMH encourages virtuous retargeting.

For the purpose of luxury cultural and creative industries, virtuous² retargeting means:

- **Whitelisting** of certain websites, with qualitative criteria to ensure that broadcasting media/channels are in line with the Maisons' values.
- **Creative work** on banners and messages (i.e. no use of ready-made templates as proposed by providers).
- **Capping** on broadcasting to limit exposure of web-users and avoid feeling of intrusion (15 maximum).

1. Loi relative à l'informatique, aux fichiers et aux libertés en date du 6 janvier 1978 (article 32).

2. Update of 28th October 2014

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V. LVMH Maisons clearly identify advertising as such when used across mediums online, including on social media and blogs.

A. We clearly identify any paid/sponsored content as such (e.g. blogs, user comments).

B. We follow the same standards for dealing with non-paid sponsored content online as we do offline (e.g. with respect to hosting journalists, sending out samples).

C. **COMMENT:** For information, this principle corresponds to the minimum required under French law³.

VI. LVMH Maisons ensure that user-generated content is consistent with our own responsibility standards by moderating user content on our digital platforms and not tolerating, for example, illicit material.

EXPLANATION: *This is already in line with the current practices of brands.*

VII. LVMH Maisons only work with suppliers whose practices are consistent with our own principles.

EXPLANATION: *For example, we ask our agencies to follow standards which are consistent with the ones we set ourselves when working on our campaigns. With regard to OBA, this means that we only work with OBA suppliers that fully comply with the accepted industry standards for notice and user control across the world.*

VIII. LVMH Maisons respect the particular needs and vulnerabilities of young people (under the age of 18) and, in this context, apply a special level of care.

EXPLANATION: *Special care can, in practice, mean for example ensuring that content is appropriate, collection of minor's data is limited, and parents are empowered to control data.*

IX. LVMH Maisons don't address unsolicited commercial communications to clients unless they have expressly given their prior written consent.

COMMENT: For information, this corresponds to the minimum required under French law⁴.

3. Article 20 de la LCEN (loi pour la confiance dans l'économie numérique) : "Toute publicité, sous quelque forme que ce soit, accessible par un service de communication au public en ligne, doit pouvoir être clairement identifiée comme telle. Elle doit rendre clairement identifiable la personne physique ou morale pour le compte de laquelle elle est réalisée."

4. Article 22 de la LCEN (loi pour la confiance dans l'économie numérique): "Est interdite la prospection directe au moyen d'un automate d'appel, d'un télécopieur ou d'un courrier électronique utilisant, sous quelque forme que ce soit, les coordonnées d'une personne physique qui n'a pas exprimé son consentement préalable à recevoir des prospections directes par ce moyen."
