

Deloitte.



Candidate Privacy Statement
What will we do with your
data?

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1. Privacy statement and legal terms for use of the Deloitte recruitment management system

DATE OF LAST REVISION: April 2019

Thank you for your interest in exploring career opportunities with Deloitte. Before continuing, please take a few minutes to read and understand our Privacy Statement.

This privacy statement (the "Privacy Statement") explains what information relating to you as an identified or identifiable natural person ("Personal Data") we gather about you as an applicant for a job or an internship within Deloitte Luxembourg, what we use that Personal Data for and who we give that Personal Data to, when we are acting as controller for these data. It also sets out your rights in relation to your Personal Data and indicates whom you can contact for more information or queries. Click on the links below, which will take you to the more detailed sections of this Privacy Statement:

- Scope of this Privacy Statement
- When and which Personal Data we collect?
- How we use Personal Data and on which legal grounds?
- Whom we disclose Personal Data to?
- Protection of Personal Data
- How long we keep Personal Data for?
- Your rights
- Right to complain
- Changes to this Privacy Statement

1.1 Scope of this Privacy Statement

This Privacy Statement applies to Deloitte Luxembourg as a controller within the meaning of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter the "General Data Protection Regulation – GDPR"), when processing Personal Data of job or internship candidates.

Deloitte Luxembourg, hereinafter also referred to as "we", "us" or "our", refers to one or more of Deloitte Touche Tohmatsu Limited ("DTTL")¹, its network of member firms and their related entities in Luxembourg as identified here, depending on which entity is offering a job or internship position:

Deloitte General Services ("DGS"), société à responsabilité limitée, having its registered office at 560, rue de Neudorf, L-2220 Luxembourg;

Deloitte Tax & Consulting ("DTC"), société à responsabilité limitée, having its registered office at 560, rue de Neudorf, L-2220 Luxembourg;

Deloitte Audit, société à responsabilité limitée, having its registered office at 560, rue de Neudorf, L-2220 Luxembourg;

¹ A UK private company limited by guarantee. DTTL and each of its member firms are legally separate and independent entities. DTTL (also referred to as "Deloitte Global") does not provide services to clients.

Deloitte Solutions ("DSO"), société à responsabilité limitée, having its registered office at 560, rue de Neudorf, L-2220 Luxembourg;

Fiduciaire Générale de Luxembourg ("FGL"), société à responsabilité limitée, having its registered office at 560A, rue de Neudorf, L-2220 Luxembourg;

Deloitte LIS ("DLIS"), société à responsabilité limitée, having its registered office at 560, rue de Neudorf, L-2220 Luxembourg.

Deloitte Luxembourg is part of a network of companies which comprises of DTTL and its independent member firms or their related entities (collectively, the "Deloitte Network"). To learn more about DTTL, the member firms of DTTL and their related entities, please visit [About Deloitte](#).

This Privacy Statement sets out how we will process (i.e. collect, handle, store and protect) your Personal Data during our recruitment process and until this process is completed as a result of the signature of an employment or internship agreement with us.

It also contains information about when and how we share these Personal Data with other members of the Deloitte Network or other third parties (for example our service providers) and the way you can exercise your rights related to these Personal Data.

This Privacy Notice only applies to the Personal Data of job or internship applicants. It does not apply to our employees, contractors or clients, or to other personal data that we collect for other purposes.

We are committed to protecting your privacy and handling your Personal Data in an open and transparent manner. This also applies to Personal Data pertaining to third parties when you have provided us with Personal Data relating to them in the course of your application via our recruitment management system (e.g. for reference purposes or of relatives as described below) and subsequent steps we may take to assess the suitability of your application for the role you applied for or similar position.

1.2 When and which Personal Data we collect?

1.2.1. When do we collect Personal Data?

We collect Personal Data

- directly from you during your recruitment process (mainly via our website, correspondence exchanges and interviews during the hiring process); or
- indirectly from third parties such as offline or online social media and legally accessible databases used by the HR department or any referee you may provide us with in the course of the recruitment process to the extent relevant for the proposed position.

Please note that Personal Data may also be created as a result of your use of our recruitment management system (logins details or feedback forms).

1.2.2. Which Personal Data are collected?

We primarily collect your Personal Data as required to assess your suitability for a position within Deloitte Luxembourg. However, due to our legal and regulatory obligations under Luxembourg laws (mainly Luxembourg employment laws) or to determine benefits we may offer you (and your relatives as the case may be), we might also ask you to provide us with Personal Data pertaining to your relatives, spouse (or equivalent), or children which we will only process as further described herein.

The categories of Personal Data listed below are processed for the purposes, which are detailed in section 3 below.

Regarding your Personal Data, the categories of Personal Data that we process include:



Identification information such as a copy of your national identity card or passport, which include identification numbers, age, date and country of birth, gender;



Contact details such as your name, surname, e-mail address, home or professional address, or country of residence or those of relatives;



Photo, image or likeness;



Your signature ;



Your educational, professional, familial and social background and relationships such as your employment and education details (for example, your level of qualification and diploma, your former employer(s), your job title and your position details or other information which may be contained in your curriculum vitae); your marital status and members of your family (when needed, for example, to determine your net remuneration or benefits we can offer you or to potentially assist you in the obtention of residence and work permit);



Financial and tax-related information such as your income, benefits, tax residency, payment or bank accounts details;



E-mail and computer access details such as your IP address; your browser type and language; access logs (including access times; websites use and monitoring thereof) or data in relation of communications we send you regarding our events and services; details of how you interact with us; devices used; location data and other similar information;



Background information provided by you (such as criminal record extract) or collected from open data, legally available databases or public records as part of our ongoing risk management processes (this information may also include special categories of Personal Data) to the extent legally permitted;



Communication information such as recordings of telephone/skype conversations, voice mail, e-mailing, text messages as well as login details regarding your use of our recruitment management system;



Ownership and transactional details (financial holding details, insurance contracts, etc.), which may be required depending on the grade you are applying for as we must ensure, as your future employer, that we will be able to comply with our contractual, legal or regulatory duties – especially in terms of independence or prevention of insiders dealing -.

Regarding Personal Data of your relatives (including your children if any), the categories of Personal Data that we may process – generally before making any conditional offer- **include:**



Identification information such as age, date and country of birth or gender (or copies of their national identity cards or passports in case you request us to assist with the granting of residence permits of your relatives after your acceptance of our conditional job offer);



Contact details such as your relatives' name, surname, e-mail address, home or professional address, or country of residence or those of relatives;



Familial background and relationships with you as employee, such as marital status and members of your family (mainly when needed to provide you with certain benefits or to assist you in obtaining a residence or work permit; and



Financial and tax-related information such as your partner's tax class, salary package (mainly for salary simulation purposes).

Please note that we may need to collect so called **'sensitive' or 'special categories' of Personal Data** in limited circumstances and to the extent legally permitted, mainly **your Criminal records** as required to perform background checks and comply with our obligations under Luxembourg laws.

Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions may be contained in the documents you provide us with (for example in your identification documents or in your CV) or otherwise disclosed by yourself during the recruitment process. We would advise you not to provide such information unless strictly necessary (e.g. when contained in an official document that you have to share with us). In case of doubt, you may contact luhrservicesdesk@deloitte.lu.

When you provide Deloitte Luxembourg with Personal Data about your relatives, spouse or equivalent or about any other individual such as referee during the recruitment process, please ensure that, you provide those persons with relevant information regarding the processing of their Personal Data (as provided for in this Privacy Statement) as they are not in direct contact with Deloitte Luxembourg.

We understand the importance of protecting children's privacy. It is not our policy to intentionally collect, store or in general process Personal Data pertaining to minors , save in the context of internships (in such case, for minors above 16 years) .

1.3 How we use your Personal Data and on which legal grounds?

1.3.1 Use of Personal Data to assess candidate's suitability to the position applied for

We will use Personal Data you are providing us with (online via our recruitment management system or offline during further written or oral exchanges) in order to assess your suitability for open positions within Deloitte Luxembourg and take necessary steps prior to entering into any employment contract with you.

1.3.2 Use of Personal Data to make you a job offer

We may use Personal Data you provided us with to make you a job offer.

1.3.3 Use of Personal Data to comply with our legal obligations

We will use your Personal Data to comply with our legal obligations, mainly:

- our obligations under Luxembourg laws and regulations such as anti-money laundering/know your client (AML/KYC) obligations, independence, fight against corruption, or equality and diversity within Deloitte Luxembourg;
- our legal duties as future employer such as filing with Luxembourg authorities, mainly to the Administration de l'Emploi (when posting a position or making a conditional offer);
- our legal obligation to address requests and communications from competent authorities and courts.

1.3.4 Use of Personal Data for other business purposes

We may also use your Personal Data based on our legitimate interest for the purposes of, or in connection with:

- Our need to assess the specific risks associated to candidates' prior activities when relevant for a position (reputational risks, integrity, etc);
- our need to be able to deal with complaints or legal disputes involving you or service providers we use in the context of our recruitment process;
- business improvements and related collection of feedback, conduct of surveys and data analytics studies (among other things to review and better understand employee satisfaction and turnover);
- requests for advice or support from our professional advisors, such as lawyers, accountants and consultants or other service providers (such as archiving, security services, IT or printing) either to execute our contractual obligations towards you.

1.4 Whom we disclose Personal Data to?

In connection with one or more of the purposes outlined in the "How we use Personal Data and on which legal grounds?" section above, we may be using various service providers (acting as processors) and disclose details about you in this context, but also need to share certain information within other entities to meet our legal or contractual obligations or for operational efficiency. These service providers and entities include:

- Deloitte General Services ("DGS"), société à responsabilité limitée, having its registered office at 560, rue de Neudorf, L-2220 Luxembourg, in its capacity as processor to all the members of Deloitte Luxembourg for the purpose of recruitment and related HR tasks;
- third parties that provide services to us and/or to the Deloitte Network (such as software providers, clouds where software we are using to support our recruitment process and our HR department activities may be located ; security companies for our office to the extent required for them to provide their services;
- other members of the Deloitte Network, which may be located in jurisdictions outside the European Economic Area ("EEA") as part of global administration of the network and/or as required for you to use Deloitte applications, systems and to participate in trainings, upon your acceptance of our job offer;
- Luxembourg public administrations, such as the Administration de l'Emploi and other competent authorities (including courts and authorities regulating us) or another member of the Deloitte Network to the extent legally permitted or required;
- The recruitment agency who initially posted – on your behalf - some of your Personal Data on our recruitment management platform, this in order to keep them informed of the status of your application (i.e. restricted access);
- our advisers (for legal, tax or other matters).

The privacy policy of such services providers (whose details are available upon request to ludataprivacy@deloitte.lu) is available for your reading on their website.

Please note that some of the recipients of your Personal Data referenced above may be based in countries outside of the European Economic Area (EEA), whose laws may not provide the same level of data protection as that ensured within the EEA. In such cases, we are ensuring that there are adequate safeguards in place to protect your Personal Data that comply with our legal obligations. Where the recipient is not a member of the Deloitte Network, the adequate safeguard might be a data transfer agreement with the recipient based on standard contractual clauses approved by the European Commission for transfers of personal data to third countries or the EU/Europe privacy shield, as updated from time to time.

Further details of the adequate safeguards described above used by Deloitte Luxembourg in respect of such transfers can be obtained from us by contacting our Data Protection Officer (DPO) at DataPrivacy@deloitte.lu.

Notwithstanding any other cases described herein, we may also need to disclose your personal data, if and to the extent required to do so by law, to a regulator or during legal proceedings.

For your complete information, we may share non-personal, completely anonymized and aggregated information with third parties for several purposes, including data analytics, research, submissions, thought leadership and promotional purposes.

1.5 Protection of Personal Data

We use a range of physical, electronic and managerial measures to ensure that we keep your Personal Data secure, accurate and up to date. These measures include:

- education and training to relevant staff to ensure they are aware of our privacy and confidentiality obligations when handling Personal Data
- administrative and technical controls to restrict access to Personal Data on a 'need to know' basis
- technological security measures, including fire walls, encryption and anti-virus software
- physical security measures, such as staff security passes to access our premises
- technological measures to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services
- safeguards to ensure our ability to restore the availability and access to Personal Data in a timely manner in the event of a physical or technical incident and
- a process for regularly testing, assessing and evaluating the effectiveness of technical and organizational measures for ensuring the security of the processing.

Although we use appropriate security measures once we have received your Personal Data, the transmission of data over the internet (including by e-mail) is never completely secure. We endeavor to protect your Personal Data, but we cannot guarantee the complete security of data transmitted over the internet.

1.6 How long we keep Personal Data for?

If you are hired, Personal Data will be stored during your employment as well as during a term subsequent to the end of your employment.

If you are not hired, we will still store your Personal Data for a period of 2 years from the date of the last update of your profile on our recruitment management system, unless you agree via our online recruitment management system to extend this period. During this period and should a new opportunity arise that may be of interest for you, we may recontact you and use Personal Data already provided during the previous recruitment process to initiate a new recruitment process to the extent you have agreed thereto via our online recruitment management system.

1.7 Your rights

You have various rights in relation to your Personal Data. In particular, you have a right to:

- obtain confirmation that we are processing your Personal Data and request a copy of the Personal Data we hold about you;
- ask that we update the Personal Data we hold about you, or correct such Personal Data that you think is incorrect or incomplete;

- ask that we delete Personal Data that we hold about you, or restrict the way, in which we use such Personal Data in specific circumstances provided by law and especially if there is no longer a need to process your Personal Data or if we no longer have a valid legal ground to process them;
- receive a copy of the Personal Data, which you have provided us with, in a structured, commonly used and machine-readable format and the right to transmit such Personal Data to another party (to the extent the processing is based on consent or a contract and Deloitte Luxembourg is acting as data controller);
- object to our processing of your Personal Data when processed for marketing or profiling purposes or based on legitimate grounds.

In order to assist us in keeping your Personal Data (as described in section “When and which Personal Data we collect”) accurate and current, please keep us informed if any of your Personal Data change during the recruitment process.

Please note that where the provision of the requested Personal Data to Deloitte Luxembourg is required because of a statutory or contractual obligation, failure to provide Deloitte Luxembourg with the requested Personal Data would result in Deloitte Luxembourg no longer being able to comply with its own obligations and thus may lead us to stop the recruitment process.

To exercise your right to rectify your Personal Data and to inform us about any change thereof, please proceed via the Deloitte online recruitment management system you used to provide your Personal Data. If such Personal Data were provided by other means and cannot be accessed via this online recruitment management system, please contact [xxxx]. To exercise any of your other rights, or if you have any other questions about our use of your Personal Data, please contact our Data Protection Officer (DPO) at DataPrivacy@deloitte.lu.

You may also use these contact details if you wish to make a complaint to us relating to the protection of your Personal Data.

1.8 Right to complain

If you are unhappy with the way we have handled your Personal Data or you have any privacy query or request that you have raised with us, you have a right to complain to the EU Data Protection Authority (“DPA”) in your jurisdiction. For Luxembourg, you may contact the *Commission Nationale pour la Protection des Données* (CNPD). Otherwise, if you would like to be directed to the appropriate DPA, please [contact us](#).

1.9 Changes to this Privacy Statement

We may modify or amend this Privacy Statement from time to time.

To let you know when we make changes to this Privacy Statement, we will amend the revision date at the top of this page and we encourage you to regularly review our Privacy Statement available on our online recruitment management system to stay informed. In case of direct collection of your Personal Data by Deloitte Luxembourg by other means than our recruitment management tool, if we make changes that materially alter your privacy rights, we will also provide you with an ad-hoc notification of these changes, via email or other acceptable communication means.



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