

Deloitte Privacy Policy



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1 INTRODUCTION.

In Deloitte the Netherlands's day-to-day practice ('Deloitte'), numerous data is processed, including data relating to identified or identifiable natural persons ('Personal Data').

Deloitte attaches great importance to the careful handling of personal data of its Prospects, Customers, Suppliers and other business relationships and considers it important that the Processing of Personal Data is carried out in accordance with the provisions of the privacy laws and regulations, including the General Data Protection Regulation ('GDPR'), so that the protection of the privacy of the Data Subjects concerned is adequately guaranteed. This privacy policy covers the processing of Personal Data of Prospects, Customers, Suppliers and other business relationships.

1.1 Definitions.

In this privacy policy we use the concepts described beneath. In this is policy we refer to these concepts with capital letters.

Policy	Privacy policy;
Data Subject	the natural person to whom the Personal Data relate;
Customer	a natural or legal person with whom Deloitte has entered into an agreement as a contractor;
Supplier	a natural or legal person with whom Deloitte has entered into an agreement as a client;

Prospect	potential customers, with whom Deloitte has not (yet) entered into a written agreement as contractor and other business parties with which the relationship has already been formalized in any way;
Processor	a natural person or organization, that processes personal data for the benefit of the Controller;
Processing	an operation or a whole of operations relating to Personal Data or a whole of Personal Data, whether or not carried out through automated processes, such as collecting, recording, organizing, structuring, storing, updating or modifying , request, consult, use, provide by means of transmission, dissemination or otherwise making available, aligning or combining, shielding, erasing or destroying data.
Controller	the party concerned, that determines the purpose and means of processing personal data alone or together with other parties;

1.2 Scope and objective.

This Policy describes how Deloitte deals with Personal Data processed of our Prospects, Customers and Suppliers.

Deloitte could be classified as controller and as a processor within the meaning of the GDPR. This Policy specifically looks at situations in which Deloitte qualifies as Controller.

However, if Deloitte qualifies as a Processor, a processor agreement should be concluded with the relevant Controller, in which agreements are made on the Processing and Protection of Personal Data, including implementing sufficiently appropriate technical and organizational security measures for processing personal data and international transfers.

This Policy is not exhaustive. It may be that different or additional policies apply to specific processes of Personal Data. If this is the case, information will be provided to Data Subjects for that specific Processing if necessary.

2 INFORMATION.

2.1 Processing purposes, legal grounds and (international) transfer.

Deloitte distinguishes three different categories of Data Subjects: Prospects, Customers and Suppliers. Below is indicated per category for which purposes the collected Personal Data is processed and what the legal basis is for the Processing thereof.

Purposes	Legal basis
Prospects	
Processing shall be carried out for: <ul style="list-style-type: none"> - establishing and/or maintaining relationships with Prospects; - the implementation of procedures relating (with the (possibly) entering into an agreement) with Prospects. 	<p>Personal data of Prospects are processed (to prepare an agreement) for entering or implementing an agreement in which the prospect in question is (possible) a party.</p> <p>If no agreement has been concluded with Deloitte, Deloitte may process Prospects' Personal Data to represent its legitimate interests or those of a third party. In that case, the legitimate interest consists of establishing and maintaining relationships with Prospects, unless otherwise indicated or otherwise shown by the context. This includes, for example, inviting Prospects to Deloitte events.</p> <p>Prospects personal data may also be processed by Deloitte to comply with a legal obligation based on Deloitte.</p> <p>Deloitte Otherwise processes prospects' personal data based on the consent of the prospect in question.</p>
Customers	
Processing shall be carried out for: the execution of the client acceptance procedure. <ul style="list-style-type: none"> - the service and/or advice to the Customer; - collecting claims owed to Deloitte; - maintaining relationships with the Customer; - the handling of disputes and (legal) proceedings; - the implementation or application of a law; 	<p>Customer's personal data is processed in the execution of an agreement to which the customer is a party.</p> <p>If no (oral) agreement has been concluded between Client and Deloitte or if the Processing of Personal Data is not necessary in connection with the performance of an agreement, Deloitte may provide the Personal Data for the promotion of its justified interests or for a Third Party. For example, in the context of maintaining the relationship with the Customer.</p> <p>Customer personal data may also be processed by Deloitte to comply with a legal obligation based on Deloitte.</p> <p>Deloitte Otherwise processes customers' personal data based on the consent of the customer concerned.</p>

Suppliers	
<p>Processing shall be carried out for:</p> <ul style="list-style-type: none"> - carrying out (internal) acceptance procedures; - making payments to the Supplier; - maintaining relationships with the Supplier; - dealing with disputes and (doing) the exercise of audit; - the implementation or application of a law. 	<p>Personal data of Suppliers is processed to fulfill an agreement to which the supplier in question is a party.</p> <p>If no (oral) agreement has been concluded between Supplier and Deloitte or if the Processing is not necessary in connection with the fulfillment of the agreement, Deloitte may provide the Personal Data for the purpose of its legitimate interests or for a Third Party. For example, this could include maintaining the relationship with the Supplier.</p> <p>Personal data of Suppliers may also be processed by Deloitte to comply with a legal obligation based on Deloitte.</p> <p>Deloitte otherwise processes the Personal Data of Suppliers based on the consent of the relevant Supplier.</p>

2.2 Revoke consent.

Where the Processing as indicated above is based on consent, the Data Subject concerned has the right to revoke his/her consent at any time. The Data Subject can do this through the RRL Office/Privacy Leader (see paragraph 3). Revoking consent does not affect the legality of the Processing prior to the withdrawal.

2.3 Storage periods.

Agreements concluded with Deloitte (and which may include Personal Data) may be held by Deloitte for up to 10 years after the end of the agreement for the purpose of possible claims related to or arising from the agreement.

Personal data of Deloitte suppliers and customers will be deleted (otherwise) as soon as possible after the relevant transaction has been completed or the relevant claim has been fulfilled, unless the Personal Data is necessary in the case of satisfaction with a statutory retention obligation.

Such a statutory retention obligation, for example, concerns the tax administration obligation with a retention period of seven years under which Deloitte will have to retain tax-relevant (Personal) data. Specific regulations for accountants also require a retention period of seven years (or longer) for certain documents.

For other Personal Data, these are not retained for more than three months after the purposes for which this Personal Data were collected have been achieved, unless otherwise agreed between the parties.

2.4 Rights of Data Subjects.

Each data subject has the right to obtain an explanation from Deloitte why their personal data is processed by Deloitte, as well as how to obtain access to that Personal Data. The person concerned also has the right to rectification regarding incorrect Personal Data. In addition, the data subject may request Deloitte to delete his Personal Data and it has the right to oppose the Processing of Personal Data or to negotiate the processing of the Processing of Data. Finally, in certain situations, the data subject has the right to obtain the Personal Data in a common and machine-readable form and to transfer it to another Controller.

If the Person concerned wishes to use one of the aforementioned rights, he may contact Deloitte's RRL Office/Privacy Leader. His/her contact details can be

consulted under paragraph 3.1. The Data Subject shall indicate which processing of personal data his/her request concerns.

Deloitte responds to each request within the legal time limit. In other words, Deloitte shall provide the data subject with information on the effect given to the request within one month of receipt of the request. Deloitte can extend this period by two months. The person concerned shall be informed within a reasonable time of such an extension.

If the data subject's request is not complied with, the data subject can make this known to Deloitte (see also under 3.2). The data subject concerned (also) has the right to file a complaint with the Dutch Data Protection Authority.

In order to prevent abuse, Deloitte may ask the person concerned for additional information to confirm his identity. Where a copy of a valid ID is provided to Deloitte in this context, Deloitte requests that the person concerned makes the Social Security number and passport photo unreadable.

2.5 Secrecy and security.

Deloitte ensures that persons authorized to process the Personal Data have undertaken trainings to ensure confidentiality, if they are not already subject to confidentiality under their profession or other legal provisions are bound.

Deloitte shall take appropriate technical and organizational measures to ensure a level of security tailored to the risk, taking into account the state of the art, the execution costs, as well as the nature, size, context and processing purposes and the likelihood and seriousness of a variety of risks to the rights and freedoms of Data Subjects.

2.6 (Reporting obligation) data breaches.

If a security breach has occurred, Deloitte will report this to the Dutch Data Protection Authority and possibly also to the Data Subject concerned. Deloitte has a protocol for security incidents and data breaches that prescribes how to deal internally with security incidents and data breaches.

Deloitte's RRL Office documents all breaches relating to Personal Data, including the context relating to the data breach, its effects and the corrective measures taken.

2.7 (International) transfer.

Deloitte does not, in principle, provide Personal Data of Prospects, Customers and Suppliers to third parties except other Deloitte entities, parties involved in the implementation of an agreement, investigating and supervisory authorities (if and to the extent) when Deloitte considers this appropriate in the context of (possible) sanctions, (potential) claims or legal proceedings.

Furthermore, Deloitte ensures that any processing of Personal Data will take place within the European Economic Area (EEA) or to/from countries and organizations that ensure an adequate level of protection in accordance with the GDPR.

Deloitte has also taken appropriate protective measures for transfers other than the mentioned above for example by concluding Standard Contractual Clauses provided the country concerned has an equivalent level of data protection.

3 CONTACT.

3.1 Privacy Leader.

A Privacy Leader has been appointed as part of the Policy on the Protection of Privacy of Prospects, Customers and Suppliers.

The Privacy Leader is part of the RRL Office and is the first point of contact for compliance with this Deloitte policy. General information can be found on www.deloitte.nl.

Questions about this Policy, requests from Data Subjects and reports of loss of or any form of unlawful processing of Personal Data may be addressed to the RRL Office/Privacy Leader:

E-mail:

NLRotterdamRRLGDPR@deloitte.nl

Postal address:

Deloitte the Netherlands
Confidentiality, Privacy & Security (CPS) Office

Wilhelminakade 1
3072 AP Rotterdam

3.2 Complaints scheme.

Deloitte is committed to processing and displaying Personal Data in a lawful manner. If you unexpectedly believe that Deloitte infringes any privacy law that you are entitled to or (otherwise) harms your (privacy) interests, you have the right to file a complaint with the Dutch Data Protection Authority. Before you turn to the Dutch Data Protection Authority, we kindly ask you to first inform Deloitte's RRL Office/Privacy Leader about your complaint (contact details will be provided). Deloitte aims to provide you with a reply within four weeks of receiving the complaint.

The following information and justification may be relevant for the smooth handling of a complaint:

- a clear and accurate description of the complaint and the material at stake;
- the processing at stake;
- whether the person concerned has made use of his rights under 2.4 and to what effect it has resulted;
- reason why the data subject objects to the processing of the information and/or the material;
- what does the person concerned want to do with his/her personal data, what does the person concerned want to achieve with the complaint?
- contact details of the data subject.

4 ENTRY INTO FORCE AND AMENDMENT.

This Policy was adopted by Deloitte's Board of Directors on 19 June 2012 and entered into force from 1 July 2012.

Deloitte reserves the right to change this Policy from time to time.

This Policy was last changed at: July 2021