

Deloitte.



Consent & Preference Management (CPM)

Point of View

August 2022

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CPM overview



An introduction to consent

Consent is evolving. It's transitioning from a regulatory "check the box" exercise to a major driver of business enablement... and it's increasing the need for digital governance, changes to the digital marketing world, and better management of fundamental privacy obligations.

What is consent?

- Consent is an **indication of an individual's wishes**
- by a **statement** or an **action**
- to signify **agreement** or **disagreement** to the processing of personal information (PI) relating to them

Types of consent

Explicit - individual is clearly presented with an option to agree or disagree to the processing of their data

Implicit - granted by an individual's action (or inaction) and situational circumstances

Key attributes of valid consent...



Freely given - without any conditions or resulting detriment to an individual



Specific - clearly distinguishable from other types of consents



Informed - clarity on how data will be used before obtaining consent



Unambiguous - obvious and clear affirmative consenting action needed



Easy to withdraw - as easy to withdraw consent as it was to give consent

An introduction to preferences

As consent evolves, so do expectations regarding personal data and how it will be used. Providing individuals with additional preference and choice options increases communication effectiveness and improves the overall user experience.

Preference management is the process that allows individuals to customize how an organization uses their personal data, including related to communication preferences.



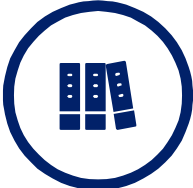
Contact Channel

Allow individuals to select their desired channel for receiving communications



Payment Method

Offer multiple payment options to an individual so their preferred method may be selected



Interests

Empower individuals to only receive communications related to their selected interests



Communication Preferences

Provide granular options for communications such as frequency, format, and language



Option to Unsubscribe

Deliver a clear method for individuals to opt-out of communications and update preference selections

We know value comes from honoring an individual's preferences...

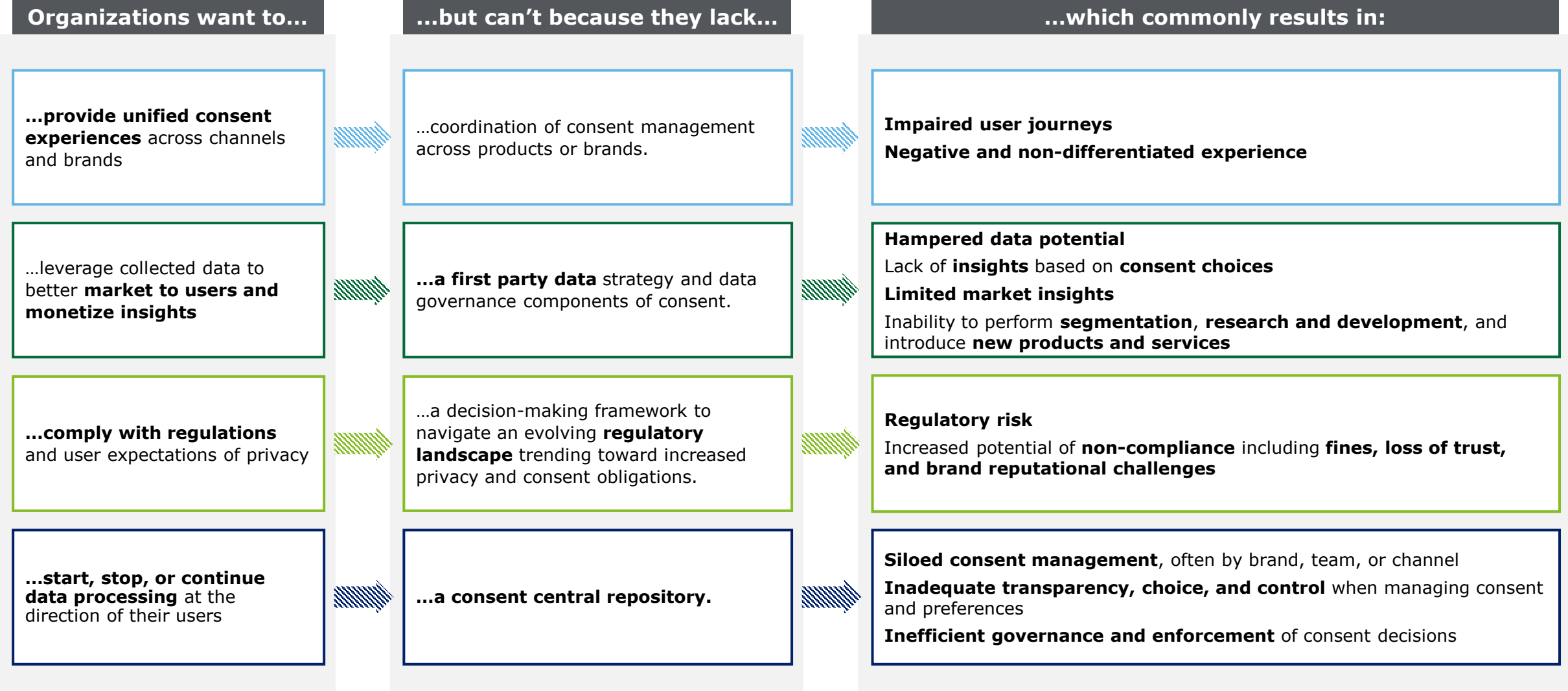
 | **Improved Communication**

 | **Enhanced User Experience**

 | **Insightful Analytics**

Business drivers leading to consent and preference management program establishment

As business increase cross-platform data collection and use, teams often see increased consent management complexities.



Benefits of a broad CPM program

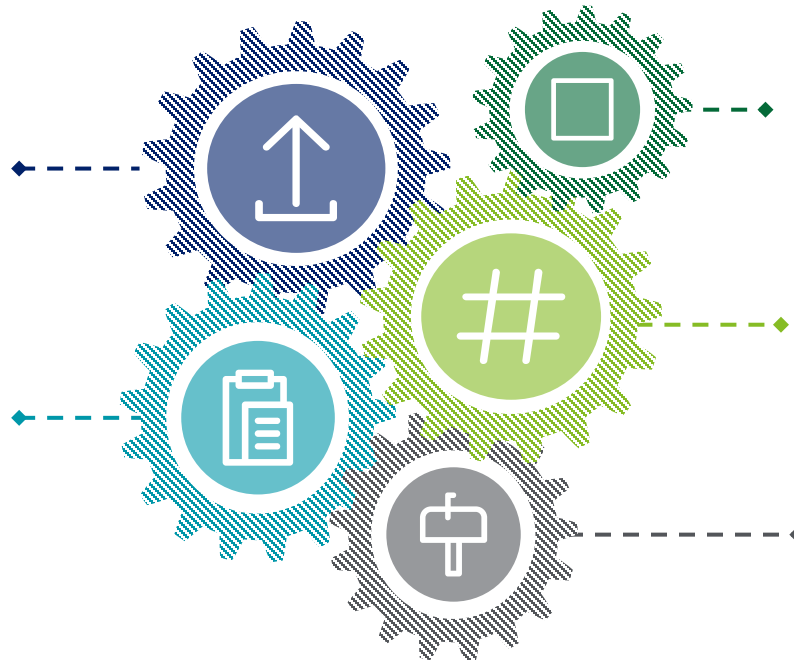
Forward-thinking organizations are leveraging CPM as a brand differentiator, and integrating it into organizational priorities, in turn increasing return on privacy investments

Driving data sharing through trust

The more trusted the brand, the more willing customers will be to share their data. Organizations with untrustworthy reputations will find it difficult to collect certain types of data, regardless of the value offered in exchange

Shifting control to individuals

Central to many customers' privacy concerns is the loss of control. Individuals may be willing to share data in one context, but still worry about their inability to dictate who else might have access and how else it may be used in the future.



Justifying data collection and data use

Consent requires transparency; by explaining the types of data collected and the purposes of collection, individuals are given visibility behind the scenes. When organizations provide the 'what' and 'why', individuals have the information they need to make informed decisions

Enhancing user experience

Organizations are increasingly focused on personalizing user experiences. It is important that organizations understand customers' interest and communication preferences to maintain a positive, customized, experience

Alignment with privacy regulations

Organizations can improve user trust while reducing the risk of regulatory non-compliance related to undisclosed data use by providing clarity about how information will be used, gathering consent where required, and managing consents and preferences effectively

62% of North Americans are **concerned** about the safety of their personal data ¹

61% of consumers **feel like they've lost control** over how their personal information is used – up from **26%** in 2019 ²

Only **27%** of consumers completely understand how companies use their personal information, and **86%** want more transparency ²

66% of customers expect companies to understand their unique needs and expectations, yet **66%** say they're generally treated like numbers ²

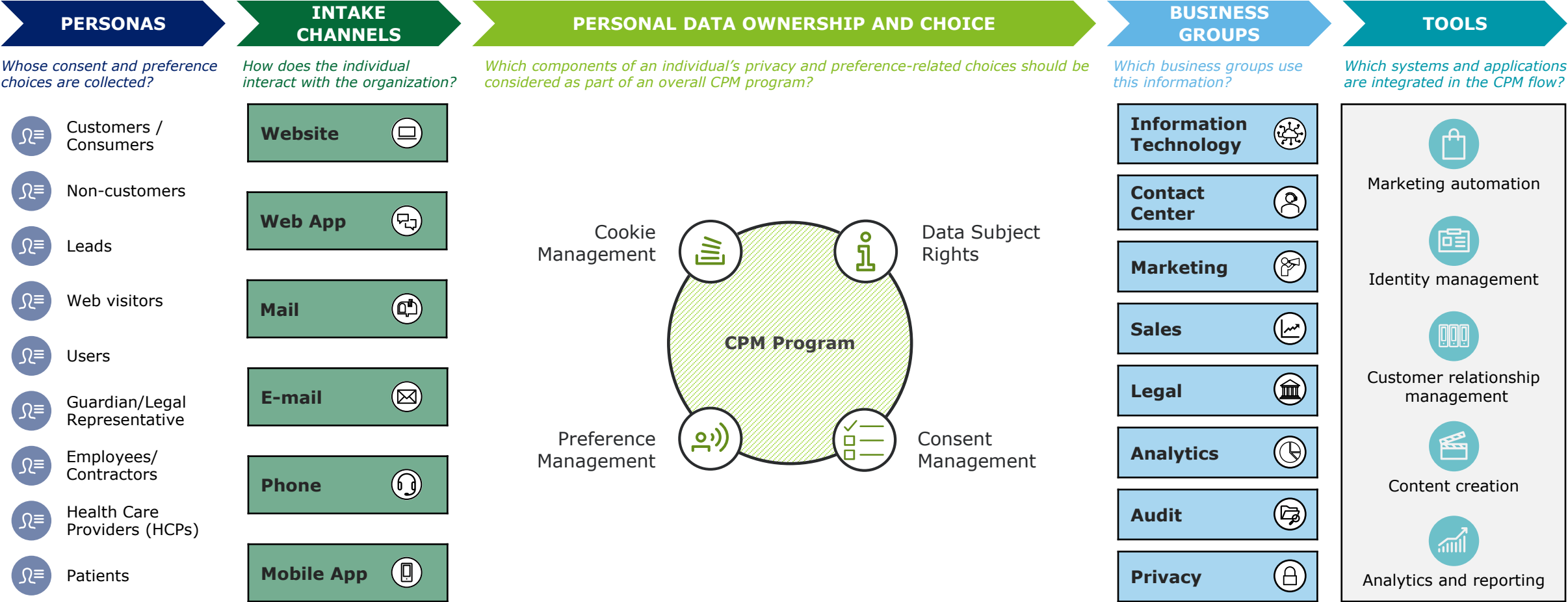
71% of countries **already have data protection and privacy laws** and **9%** of countries have **draft legislation** ³

**The complexities of
building and maturing a
CPM program**



CPM programs depend on complex synergies across the data lifecycle

Harmonious management of consent and preference data from the point of capture onwards enables unified and tailored brand experiences while maintaining a privacy-first approach...



...but if objectives are misaligned across **people, processes, and technology**, consent and preference management remains onerous and complex. It is critical for organizations to understand the potential factors which may increase complexity when establishing their CPM program.

The cross-functional footprint of CPM programs creates further challenges

Numerous and sometimes competing stakeholder groups each bring their own primary objectives to a CPM program.

Privacy / Legal

Capture appropriate consent across geographies, confirm consent language is clear, transparent, and aligned to legal requirements
CPM Objective: Confirm CPM program satisfies privacy and legal requirements across in-scope markets

Engineering / IT / Operations

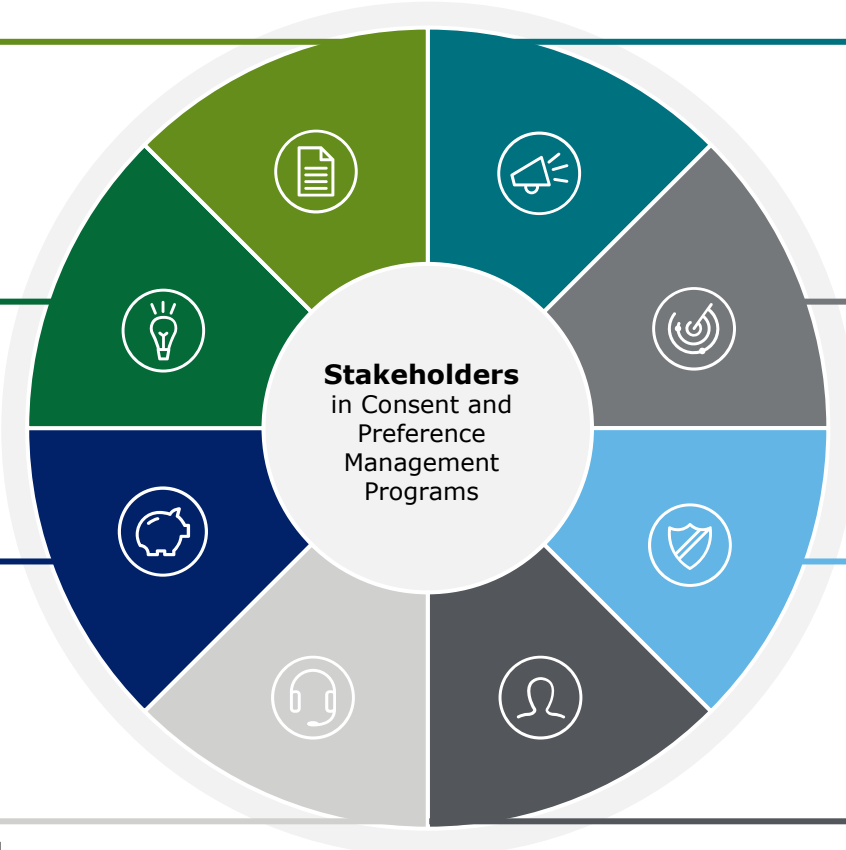
Define and/or execute a business-as-usual operations model for the CPM ecosystem to operate as expected
CPM Objective: Infrastructure and technologies are operating as expected and performance is meeting business demand

Finance

Drive top line revenue growth, ownership of budgets, fiscal year planning and strategy around Return on Investment (ROI)
CPM Objective: Understand overall costs of CPM program and ROI

Contact Centers / Customer Support

Enable effective and positive experience for users while utilizing different data points to validate users to prevent fraudulent behavior
CPM Objective: Provide support to users through the channels they prefer; help the user change their consent and preferences when desired



Marketing / Digital

Enables the ability for a clear view of the user, a trusted human experience, personalized marketing, enable intuitive digital experiences across channels
CPM Objective: Leverage user consent and preferences to market personalized content and grow revenue

Information Security

Appropriate security controls are in place to protect user data while limiting introducing unnecessary friction related to the user experiercer
CPM Objective: CPM platforms and data transfers have appropriate controls and safeguards

Fraud / Security Operations Center (SOC)

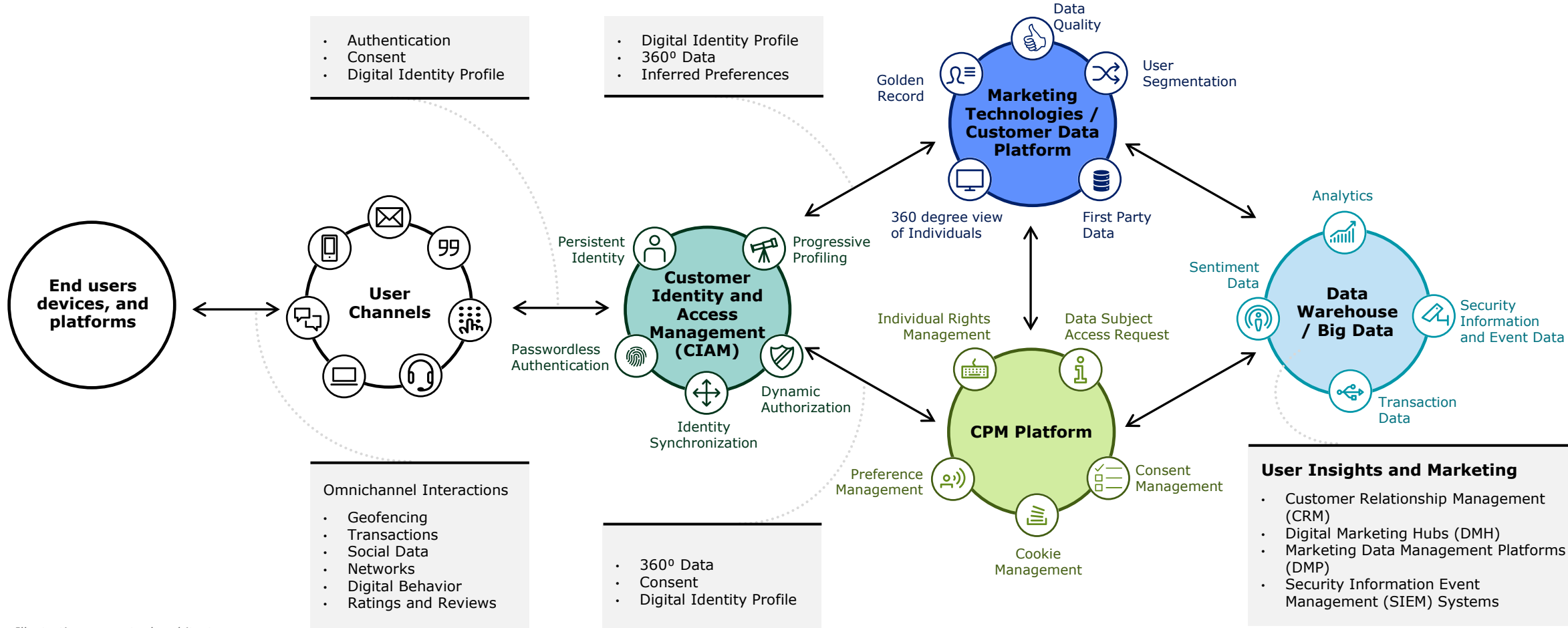
Identify risks, threats, and mitigate activities impacting users such as account take over and fraudulent activities
CPM Objective: Maintain security of user accounts and data; communicate security alerts

Organizational Change Management

Enable end users' experiences across digital channels with training and communications tied to new or updated services
CPM Objective: Demonstrate to users how to use available digital channels; enable support to help users

CPM platform integration with other tools introduces yet another layer of complexity

A central consent and preference repository allows a business to collate and push consent to and from upstream and downstream systems; but establishing this end-to-end architecture involves strategic planning and cross-functional execution.



Illustrative conceptual architecture

We understand CPM challenges and can bring our lessons learned to your program

We have served numerous global organizations looking to develop and improve their CPM programs. We have supported complex implementations that span geographies, brands, channels and user journeys.

Our team brings our tested experience, industry knowledge, CPM lessons learned, and project accelerators to every CPM engagement.

Lessons learned based on our first-hand experience



Identified business drivers

Clear drivers are important in establishing a **prioritized implementation plan**. If there is no defined **business drivers**, uncertainty and lack of direction can arise.



Alignment among stakeholders

Developing an operating model prior to implementation of a CPM solution is critical; it impacts both the project and the transition to business as usual. Sustain the model and obtain regular **alignment on key decisions** to help meet project objectives.



Willingness for change

Implementing a CPM solution may require **changes to business and technology processes**. Conforming to **current processes can result in workarounds** and additional maintenance challenges.



Establishing baseline configurations

Creating **baseline configurations** provides consistency and **scalability** across markets, brands, and experiences. As the scope **expands**, updated business and regulatory rules may require customization against the baseline.



Importance of a single identifier

Establishing a **universally unique identifier across systems** is vital for enabling a single view of known and unknown individuals. **CPM and CIAM solutions can interact to improve the overall user journey**.

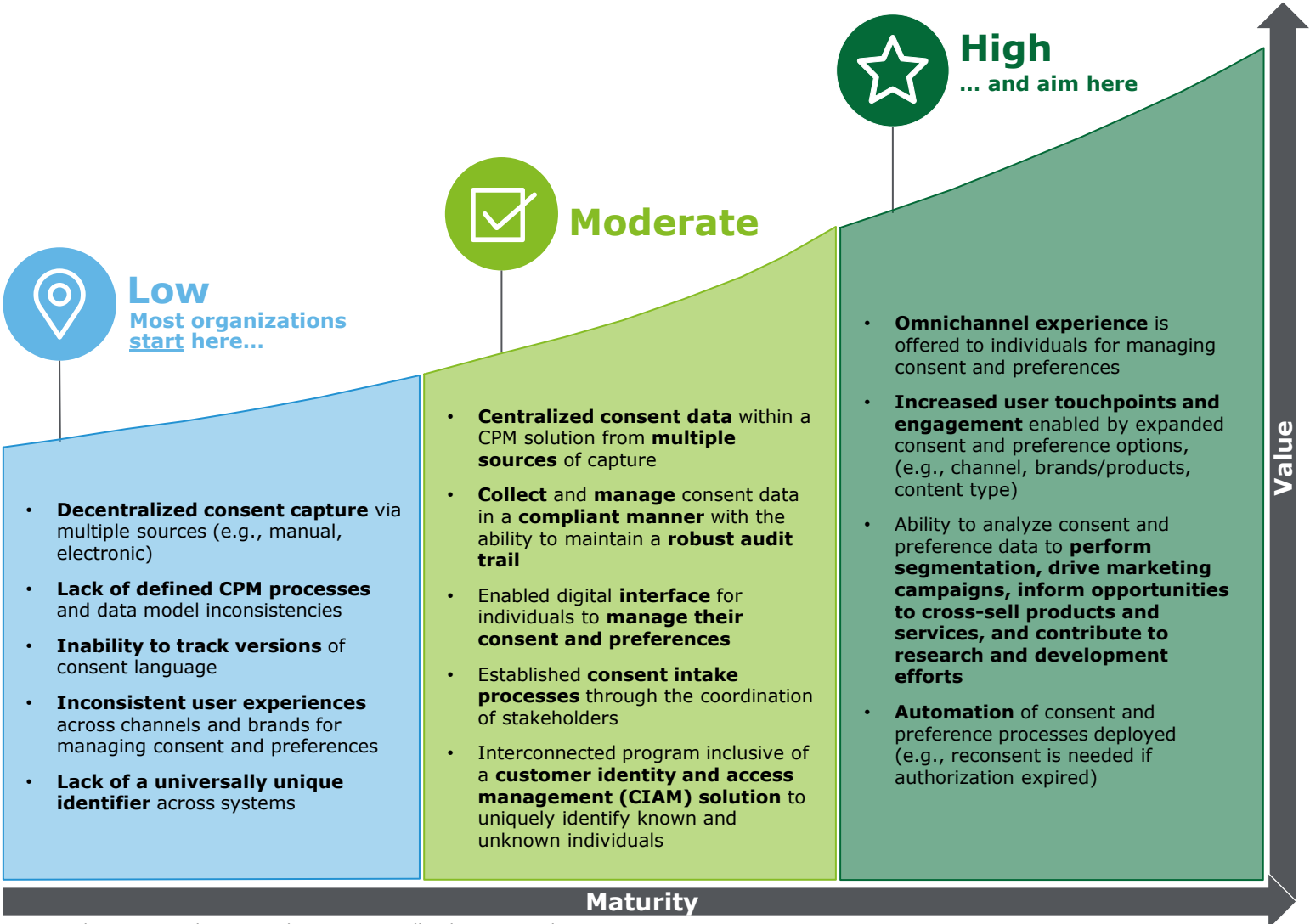


Transparent consent experience

Business logic and requirements need to be designed to produce the desired experience for individuals. Accounting for the **language, messaging, and purpose from multiple perspectives** is necessary for creating an **impactful consent journey**.

Start the journey of building a mature CPM program

Our approach can help you establish and grow a CPM program that is “right-sized” to your organization, considering your marketing/branding challenges, your size, and your risk tolerance.



Considerations for seeking your target maturity level

We consider several factors while helping our clients determine the type of CPM program to meet their needs, recognizing that every client environment and maturity target will be unique.

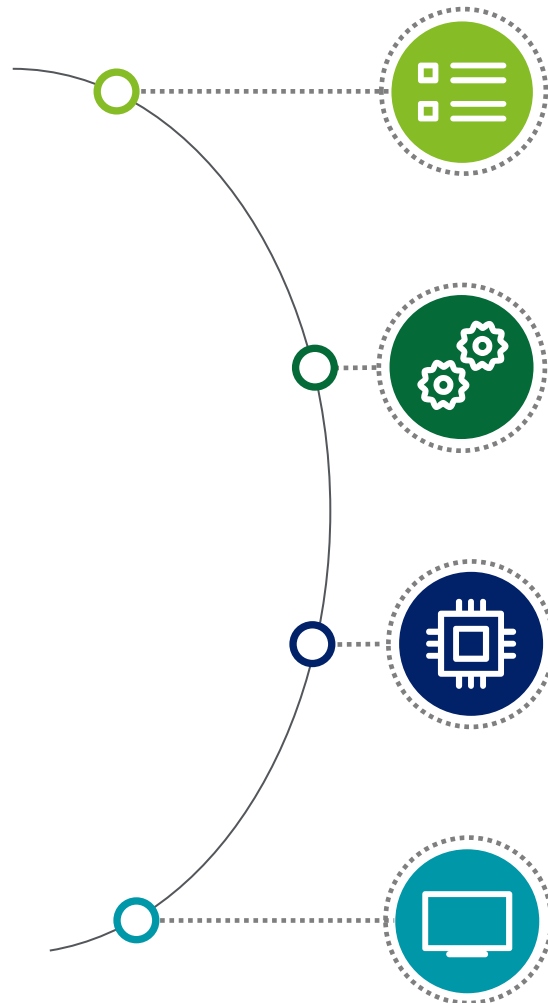
- 01 Organization size and resources**
Consider the size of your organization, including revenue, employee size, and resources available to operate a CPM program
- 02 Legal and regulatory complexity**
Consider jurisdictions and geographies in which your organization operates, as well as sectoral regulations that may apply, such as HIPAA* and GLBA*
- 03 Current consent collection process**
Consider the current volume of consents collected, the current methods of collecting these consents, and challenges associated with existing processes
- 04 Technologies leveraged in CPM process**
Consider technologies used in existing CPM processes, including privacy software, marketing automation platforms, CIAM, and others

Our approach



How we approach this journey

We help our clients implement CPM by leveraging our differentiated approach.



We leverage our tried-and-true CPM accelerators...

...to expedite CPM program implementations by enabling critical components customized specifically for your organization. These artifacts such as implementation plans, governance frameworks, and requirement libraries can be the backbone for a successful program build and deployment.

We view CPM broadly...

...to help enable a real-time data insights to achieve identity-driven CPM, correlated omni-channel experience, and personalized standards/policy enforcement.

We recognize consent as a cross-functional organizational challenge...

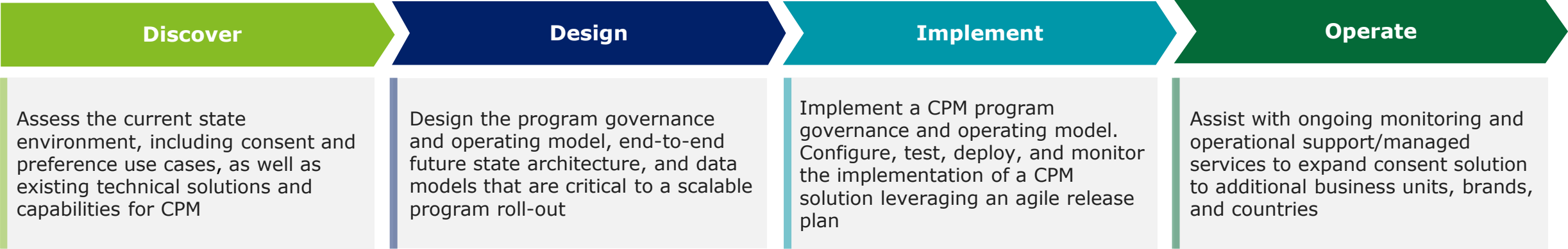
...to help develop an integrated governance and operating model built on industry leading practices that address cross-functional domains, thereby avoiding addressing consent management requirements in siloed workstreams.

We help streamline the user journey across your business functions...

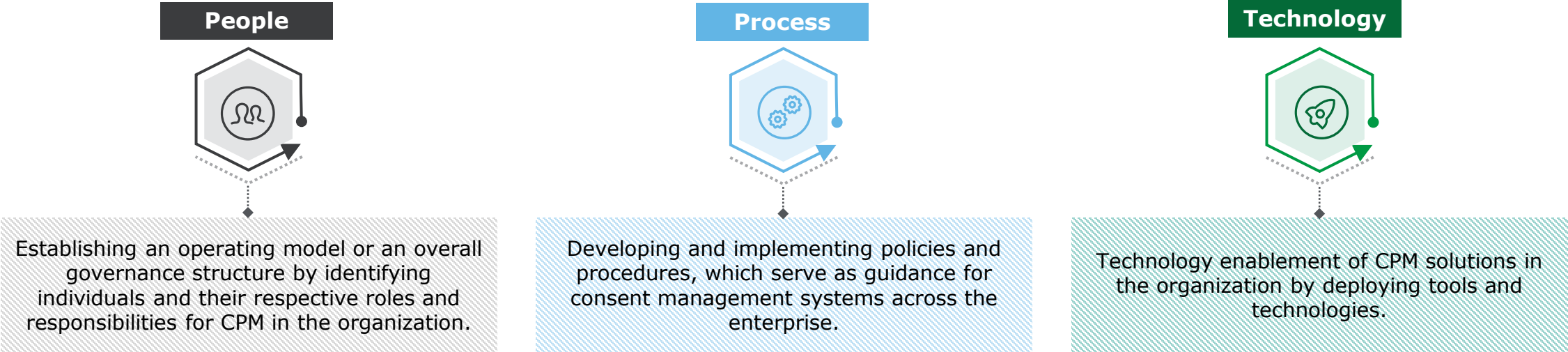
...to design and implement a centralized system of record for managing and tracking the collection, processing, and storage of consent and preference data within your organization.

Our high-level approach to implementing CPM

We leverage a four-step approach to build, implement, and operate a CPM program within your organization.

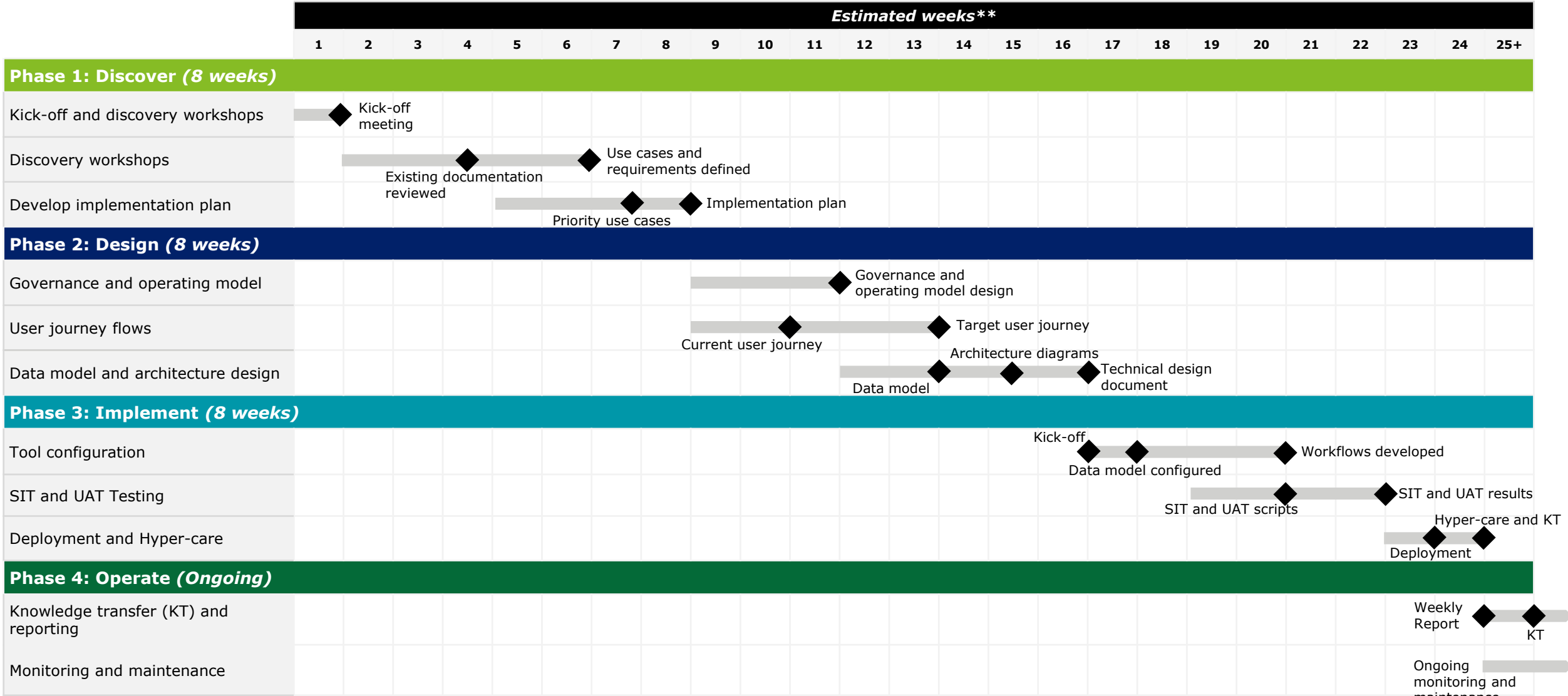


This phased approach involves activities that span across People, Process and Technology aspects of CPM.



Example timeline for initial CPM program build and implementation

Estimated timelines for activities and resulting milestones for an initial implementation (through discovery and one release cycle*) are shown below.



*Release cycle is defined as the development and deployment of a system integration with a CPM solution

**Phase durations are estimates and subject to change based on organization size, project/release scope, and stakeholder availability; this timeline depicts one release cycle.

CPM discovery phase

Discovery activities and outcomes related to requirements gathering, current state assessment, and implementation plan are detailed below.



Main Activities

- Host a project kickoff and facilitate discovery workshops with privacy, technology, marketing, and legal stakeholders to understand user journeys, use cases and requirements
- Develop and socialize use cases and requirements with the project team to prioritize and document business, functional and technical requirements along with supporting use cases in a centralized repository
- Gather and review existing policies, standards, and procedures governing the current state CPM program to provide enhancement recommendations
- Review existing templates for privacy notices, consent collection, preference centers and consent emails for migration into future state implementation
- Develop a current state inventory to record the various collection points, consent purposes, custom preferences, data elements and consent interaction types associated with each collection point
- Create an implementation plan to facilitate the execution of the design and implementation process with defined scope, timelines and stakeholder responsibilities (plan is dependent on vendor selection)

Additional Activities: Vendor Assessment

- Understand current viable vendor landscape by conducting workshops with stakeholders to prioritize technical requirements for selection
- Perform vendor assessment and review of existing products that can satisfy consent and preference requirements and determine whether to build or buy a consent and preference solution
- Develop recommendation based on the vendor assessment and facilitate contracting and procurement of a vendor, as appropriate

Sample Accelerators



Requirements and Use Case Library

CPM Collection Point Inventory

Implementation Plan

Key Outcomes (O) and Deliverables (D)

- ✓ Project kickoff presentation and discovery workshops (O)
- ✓ Prioritized requirements and use case library (D)
- ✓ CPM collection point inventory (O)
- ✓ Project implementation and staffing plan (D)
- ✓ Vendor assessment and recommendation report, as applicable (D)

*Phase durations are estimates based on experience and are subject to change based on organization size, project scope, and stakeholder availability.

CPM design phase

Design activities and outcomes related to governance, architecture, and policies are detailed below.

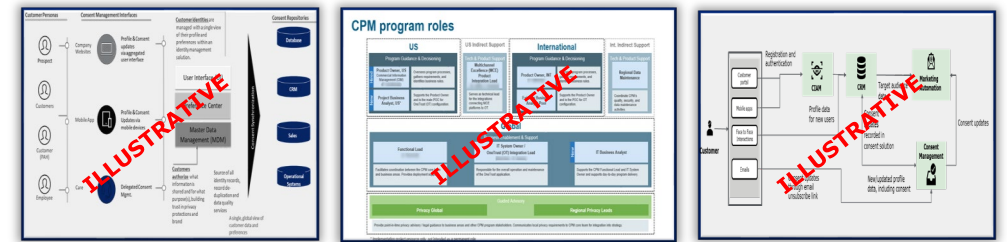


Main Activities

- Document current state user journey for each in-scope persona to understand how information is collected, processed, and stored
- Design a future state consent and preference journey flow that enables a seamless user experience for managing consent and preferences across business lines and products, and methods for exercising preferences and withdrawing consents
- Design a CPM program governance and operating model to establish clear roles and responsibilities for program build and implementation
- Define data processing policies based on organizational standards related to CPM
- Refine the future-state architecture and integration points for the CPM solution within the broader client architecture based on technical requirements gathered and stakeholder conversations
- Socialize the future state diagram with stakeholders and refine based on feedback
- Design transitional architecture diagrams for a phase-wise approach**
- Develop the data model (purposes, preferences, data elements) for managing and storing consent and preference data within CPM solution
- Develop technical design document describing global solution architecture, integrations, and module designs/workflows

****Note:** Refinement of transitional state diagrams may continue throughout the design phase to accommodate any changes or lessons learned in an agile approach

Sample Accelerators



CPM Journey Flow

Governance Framework

Architecture

Key Outcomes (O) and Deliverables (D)

- ✓ Consent and preference journey flow (D)
- ✓ Governance and operating model (D)
- ✓ Transitional/future state architecture diagrams (D)
- ✓ Data model (O)
- ✓ Technical design document (O)

*Phase durations are estimates based on experience and are subject to change based on organization size, project scope, and stakeholder availability.

CPM implementation phase

Implementation activities and outcomes related to system configuration, testing, and deployment are detailed below.



Main Activities

- Host implementation kick-off session to review scope, agile release plan, and operational responsibilities
- Configuration of the data model within CPM technology (purposes, preferences, data elements, collection points)
- Review business requirements and technical architecture design with systems owners to align on integration expectations and outcomes
- Develop system integration testing (SIT) and user acceptance testing (UAT) scripts tied back to business requirements with clearly documented expected outcomes
- Integrate CPM technology with in-scope systems to establish a centralized repository for tracking the collection, use, and sharing of consent and preference data
- Conduct, facilitate, and document the results of SIT for in-scope integrations
- Facilitate and document the results of UAT for in-scope integrations
- Review SIT and UAT results with relevant stakeholders to document go/no-go decision for deployment and go-live
- Migrate data model and workflows from UAT environment to production (PROD) environment
- Deploy and activate all the configurations/workflows in the PROD environment
- Perform hyper-care monitoring of deployed integrations to identify issues and assign resolution activities to respective stakeholders
- Develop knowledge transfer materials for transition to business-as-usual (BAU) operations
- Conduct knowledge transfer session(s) as deemed necessary by operational support model

Sample Accelerators



Implementation Kick-Off

SIT and UAT Scripts

Hyper-care tracking template

Key Outcomes (O) and Deliverables (D)

- ✓ Implementation kickoff presentation (O)
- ✓ SIT and UAT test scripts (D)
- ✓ SIT and UAT test results (D)
- ✓ Hyper-care tracking document (O)
- ✓ Knowledge transfer (KT) deck (D)

*Implementation duration is an estimate for one release and is subject to change based on release scope, organization release sprints, and stakeholder availability.

CPM operate phase

Operational activities following deployment and related to program sustainability, reporting, and monitoring are detailed below.

Discover

Design

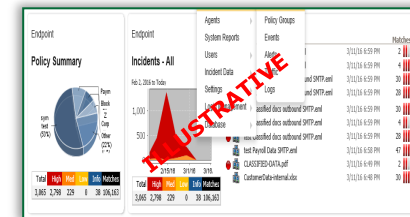
Implement

Operate
(Ongoing)

Main Activities

- Provide additional knowledge transfer services for operationalization, as applicable
- Monitor workflow logs and extract metrics on workflow activities such as:
 - Number of obtained consents and opt-outs (e.g., by channel, persona type, product, brand)
 - Number of new consent and preference profiles
 - Preferences selections by individuals (e.g., communication preferences, topics, purposes)
- Provide regular status updates and risk, action, issue, and decision (RAID) log to privacy / business stakeholders on metrics / consent and preference profile activities
- Monitor workflows and other functionalities within the CPM tool, including:
 - Transfer of consent and preference updates to downstream systems
 - Creation of consent profiles / accounts across downstream systems
 - Timely updates across systems (e.g., near real time)
- As applicable, resolve configuration issues within the CPM solution
- Assist with testing and deployment of additional configurations to address issues, as applicable
- Escalate risks, issues, and required decisions to applicable stakeholders
- Support ongoing managed operate activities for the CPM program (*see next slide*)

Sample Accelerators



Metrics and reporting

The screenshot shows a RAID log table with columns for Risk, Action, Issue, and Decision. The table contains several rows of data, including details about communication plans and system updates. A large red 'ILLUSTRATIVE' watermark is overlaid on the image.

RAID log

Key Outcomes (O) and Deliverables (D)

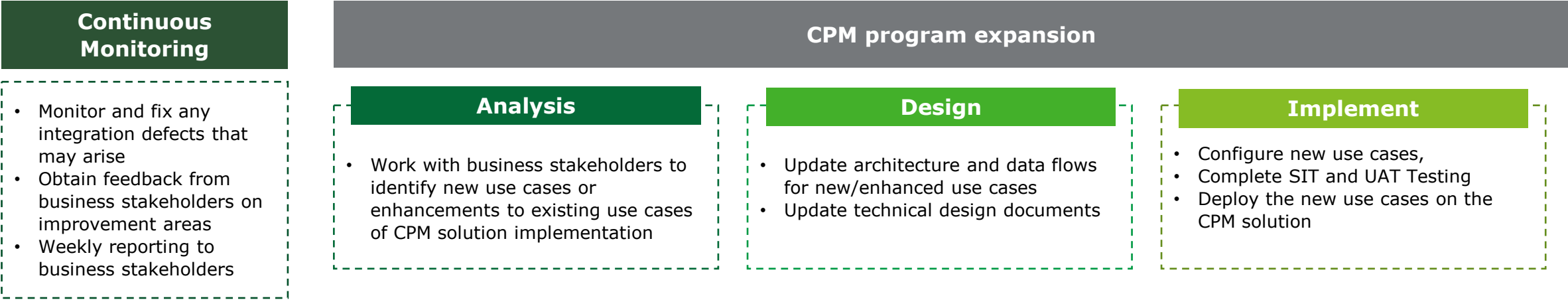
- ✓ Knowledge transfer sessions for additional functions / areas (O)
- ✓ CPM metric reports (O)
- ✓ RAID log (O)
- ✓ CPM tool configuration issue log (O)

Operationalizing CPM through managed services

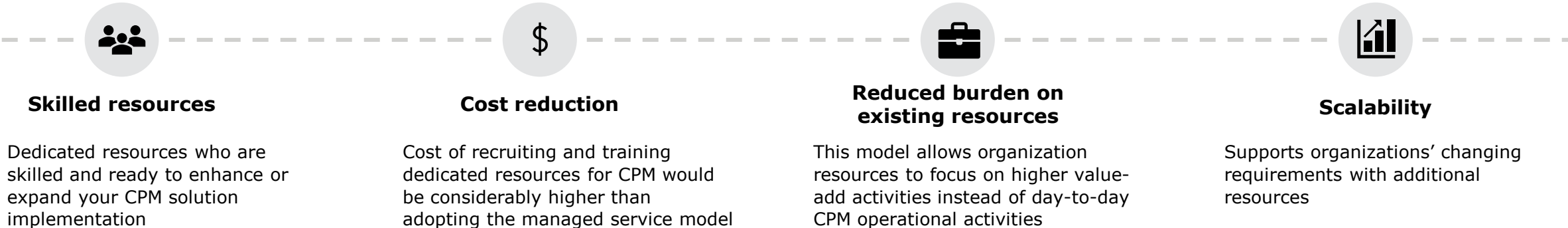
Our managed services provide skilled resources dedicated to monitoring the CPM solution and expand the CPM program to new brands, channels and geographies.



Our CPM managed services support:



Advantages of a managed services program

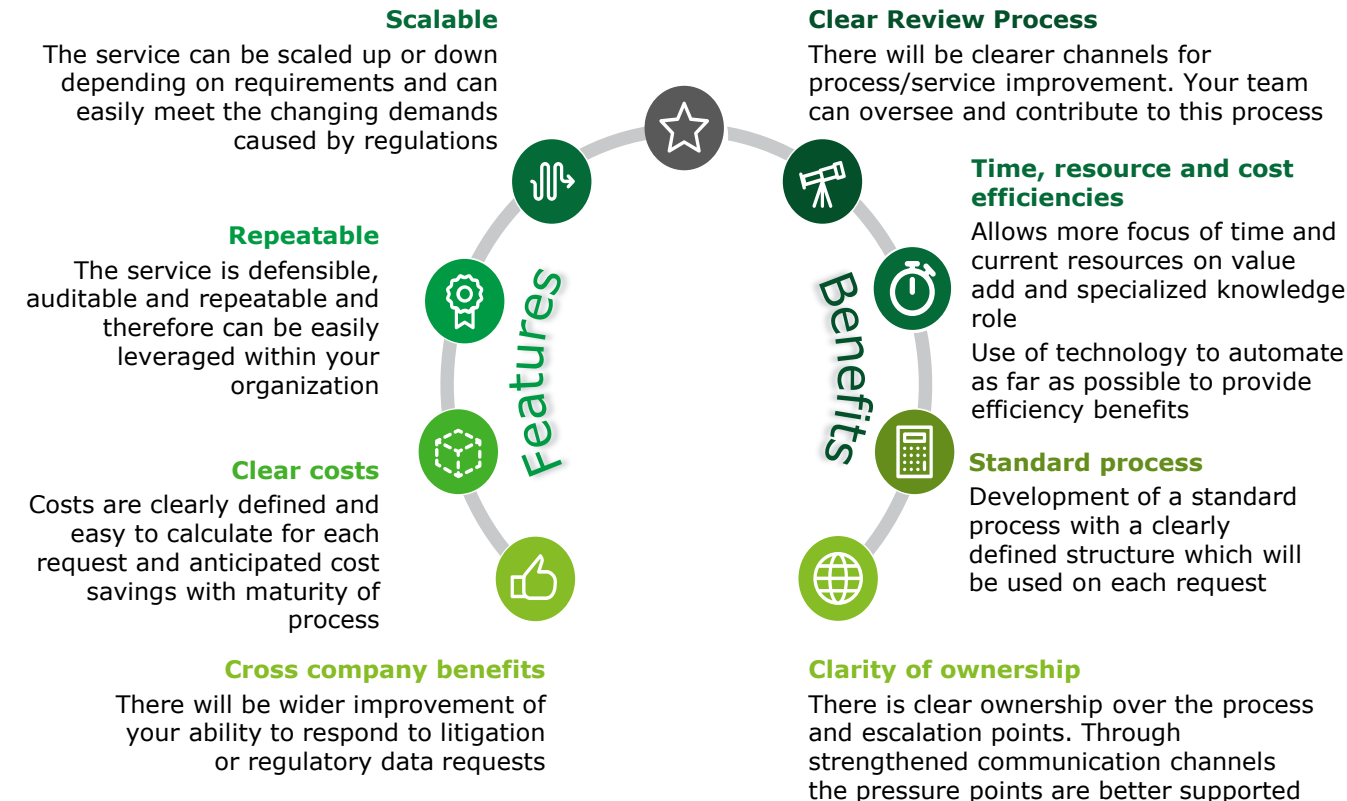


We're ready when you are

CPM managed services by Deloitte is an established, mature service offering that can be deployed on a one-off, on demand or ongoing basis.



We will design a tailored, defensible, repeatable managed service solution, subject to continuous improvement and refinement over time. Our solution is designed to offer the following features and benefits:



Deloitte's Managed Service helps organizations realize measurable benefits team in an increasingly unpredictable data request environment.

Deloitte's Managed Service can be set-up in response to a one-off event (e.g., BAU ongoing service)

Deloitte can provide CPM services in multiple jurisdictions deploying a variety of approaches to meet your requirements, including:



Getting started with CPM



How to get started?

To get started with your CPM strategy, consider the following points; we can help you define and implement your strategy and a path forward.



Have you developed an inventory of privacy notices and existing consent collection points?



Have you developed consent and preference journey flow maps from a user perspective?



Have you identified technical, business, and functional requirements to get you to your target state for CPM?



Have you assessed your need for a CPM solution? If so, have you initiated a vendor assessment (or a build-versus-buy assessment) process?



Across business units and communication channels, is there a mechanism to allow individuals to withdraw consent? Are individuals informed about their right to withdraw consent?



Do you have a mechanism for tracking consent and withdrawals with an audit trail that can demonstrate compliance to regulatory authorities?

**If no, plan to
conduct a discovery
phase**

**If no, plan to
conduct a design
phase**

Why Deloitte?

Our differentiators include our experience, our team, and our methodology, as outlined below.

Experience

- Deloitte has been providing services encompassing **consent and preference management, privacy enabling technology implementations, and privacy program assess, design and build, implement, and operate services** for over 25 years in the US and globally
- Our professionals are skilled with **project management, legal and regulatory, technology, and organizational change management** experience

Team

- Our team of **certified privacy-professionals** bring **dozens of years of experience** performing similar services for large, complex clients
- We have **over 4,000 US professionals, and access to 21,000 globally** in the areas of information security and data privacy
- Deloitte **ranked #1** in Market Share for Security Consulting Services based on revenue for **11th consecutive year** in Gartner® Market Share report ⁴

Methodology

- We bring **deep experience** providing consent and preference management services to organizations helping them create a **seamless user experience** across their brands, products, and services
- Our **flexible methodology** is **time-tested** and **efficient**, having been used to assist hundreds of organizations to evaluate, automate and mature their programs and implement enabling privacy technologies, including consent and preference management
- We recognize the impact that implementing a consent and preference management solution may have on the organization, so our recommended approach includes a **significant emphasis on implementing an operating strategy, knowledge transfer, and communications for impacted stakeholders**

⁴ See Appendix for source
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Deloitte's experienced professionals

Our practitioners have experience driven knowledge about building and implementing CPM programs leveraging leading market technologies.



150+ IAPP certified Deloitte practitioners globally



200+ practitioners certified in privacy tools across 7 certification programs



Completed 50+ privacy tech implementation projects across a variety of industries

Our CPM clients include:



US multinational beverage company



US Fortune Global 500 insurance provider



Leading US multimedia companies



US multinational retail corporation



Major US airline



US multinational hospitality company



US multinational medical technologies company

Deloitte's privacy leadership team

Our leadership team consists of professionals with extensive cross-sector experience in providing privacy and cyber security services.



Linda Walsh

Managing Director | Cyber Risk
Deloitte & Touche LLP

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Dan Frank

Principal | Cyber Risk
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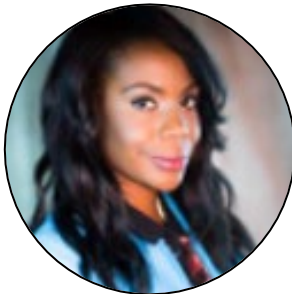
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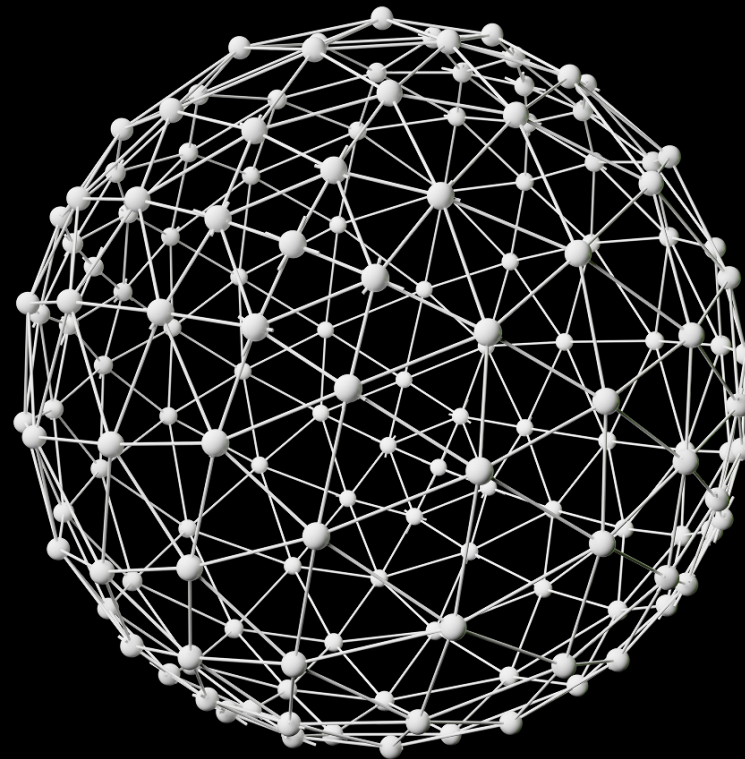


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Appendix



Multinational Biotechnology Company

Overview

Project description: Multinational biotechnology company wanted to replace a homegrown system and centralize consent. Deloitte engaged to perform discovery, implementation, and configuration of the selected Consent & Preference Management (CPM) vendor platform for prioritized uses cases inclusive of US and international markets.

Data subjects: Patients and health care providers (HCPs)

Ownership/governance: IT driven

Scope/approach: Company-wide in a phased approach, inclusive of US and INT markets

Timeline: 3 months (Discovery); 6 months (Release 1); 6 weeks (Future Releases)

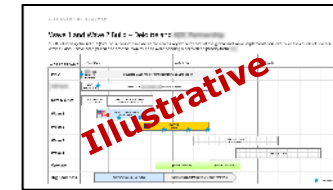
Major activities

- Develop an implementation strategy and roadmap based on discovery phase activities
- Perform project initiation to align stakeholders on project scope, timelines, and responsibilities
- Design and implement a CPM governance and operating model
- Develop a data model based on review of existing business rules, inclusive of US and international markets, and recommended/obtain approval for new business rules
- Configure the CPM platform and work with product owners to establish integrations with prioritized US and international platforms/systems to establish a co-master system of record
- Perform SIT and UAT testing and provide hyper-care after go-live
- Support future release cycles to establish the CPM vendor platform as the master system of record

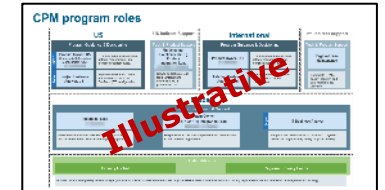
Work products and deliverables

- Implementation strategy and roadmap
- Use case definition and requirements documentation
- Governance and operating model
- Solution architecture
- Configuration and vendor integration
- SIT and UAT test plan, scripts, and summary
- Training material and sessions

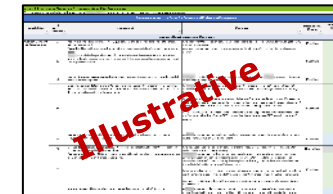
Accelerators



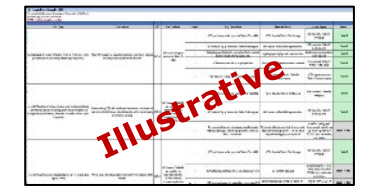
Implementation strategy and roadmap



Governance and operating model



Use case and requirements library



SIT and UAT test scripts

Challenges

- Limited appetite for changing business process requiring significant technical workarounds resulting in implementing a new tool, but maintaining old problems
- Multiple business and technical decision makers with conflicting opinions hindering ability to meet critical timelines
- Lack of unique identifier across all systems/platforms

National Consumer Products Company

Overview

Project description: The client needed a way to collect, process, and share consent and preferences across different systems. Our approach included analyzing the client's consent data model and architecture to develop a consent and preference management center, which was integrated across platforms, and catalogs consent from various communication channels.

Data subjects: Customers

Ownership/governance: Business driven

Scope/approach: Company-wide in a phased approach by channel

Timeline: 9 months (Phase 1-3)

Major activities

- Conduct discovery sessions to understand the current state consent practices and future goals
- Draft a future-state data architecture for several communication channels across multiple systems and applications
- Implement a customer-facing preference center on the client's website and mobile apps that aligns with branding requirements
- Integrate the CPM platform across multiple systems including customer relationship management applications, POS systems, and middleware platforms
- Develop training materials, playbooks, and conduct knowledge transfer sessions with the client to be able to operate the newly implemented platform
- Perform system integration and user acceptance testing with stakeholders and resolve identified issues

Work products and deliverables

- Architecture diagrams
- Preference center configuration requirements
- SIT and UAT test scripts
- Knowledge transfer materials

Accelerators



Architecture Diagram



Preference Center and Configuration Requirements



System Integration Testing and User Acceptance Testing



Knowledge Transfer

Challenges

- The client sought to provide individuals with an omni-channel experience across multiple communication channels (email, text message, mobile OS)
- Consent and preference data couldn't be exported or reconciled making it difficult to monitor KPIs and meet their business objectives

Sources

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4. Deloitte. "For the eleventh consecutive year, Deloitte retains its no. 1 position in Security Consulting Services by market share." 5/24/22. <https://www2.deloitte.com/global/en/pages/about-deloitte/press-releases/for-the-eleventh-consecutive-year-deloitte-retains-its-no-1-position-in-security-consulting-services-by-market-share.html>



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