



Deloitte Ethics Helpline Privacy Notice

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This Privacy Notice explains what personal information may be collected and processed from you when you voluntarily provide personal information via the Deloitte Speak Up website or when you contact the Deloitte Ethics Helpline call center (collectively, the "Deloitte Ethics Helpline"), and how this information may be used and shared. The Deloitte Ethics Helpline is operated by our third-party service provider, NAVEX Global. This Privacy Notice also sets out your rights in relation to your personal information and who you can contact, with additional questions or queries.

In this Privacy Notice, "Deloitte", "we", "us", and "our" refers to the data controller which is one or more of Deloitte Touche Tohmatsu Limited ("DTTL"), its global network of member firms and their related entities (collectively, the "Deloitte organization"). The applicable data controller of the personal information collected is listed at the end of this Privacy Notice within the 'Contact information' section.

Unless otherwise stated at the time of collection, the personal information requested and the way in which it is used will be in accordance with this notice and with the laws of the country where the relevant Deloitte firm/entity is located.

Any personal information you provide will be protected and handled with utmost consideration for its confidentiality and will only be disclosed to those who need to know in order to appropriately handle your inquiry or reported incident.

In certain countries, the Deloitte Speak Up website may only accept reports that relate to certain matters. If your concern pertains to a matter that, under local law, may not be accepted through this website or the Deloitte Ethics Helpline, please raise your concern directly with the appropriate Deloitte Ethics contact(s) listed [here](#).

Use of the Deloitte Ethics Helpline

The Deloitte Ethics Helpline may be used by our personnel, our third-party vendors and clients, and any member of the public who has interacted with us.

Personal information which we collect

To enable us to more fully understand and appropriately handle your inquiry or the incident you are reporting, we may collect or obtain personal information from you about yourself and/or the individual(s) central to the issue or situation. Personal information refers to information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, or with a particular individual.

For most reporters, you may have the option of submitting your inquiry or reporting anonymously. If you choose this option, we will not collect your name or any other personal contact details. Under some local laws, when reporting certain types of conduct, you receive

statutory protections if you provide your name when making the report. For more information about when these statutory protections apply, contact your Deloitte ethics contact(s) [here](#).

It is not our intention to collect 'sensitive' or 'special categories' of personal information (e.g., data relating to race or ethnic origin, religious or philosophical beliefs, trade union membership, political opinions, medical or health conditions, or information specifying the sex life or sexual orientation of an individual) through the Deloitte Ethics Helpline. However, we might gather special categories of personal information because you voluntarily provide such information to us, or because we are required to collect such information as a result of local law. Where you voluntarily provide such information to us, it will be handled in accordance with the relevant local laws.

We understand the importance of protecting children's privacy. The Deloitte Ethics Helpline is not designed for, or intentionally targeted at, children. It is not our policy to intentionally collect or store information about children.

Log information, cookies, and web beacons

Deloitte Speak Up, provided by our third-party service provider, NAVEX Global, Inc., may collect standard internet log information, including IP address, browser type and language, access times, referring website addresses, and other such information that may be necessary to enable and improve functionality. NAVEX Global Inc. is controller for such processing. For more information regarding NAVEX Global Inc.'s policy regarding internet log information it collects, please see the information in the NAVEX Global Privacy Statement (refer to the Deloitte Speak Up website home page, link at bottom right).

Types of issues that are reportable

Issues appropriate for reporting through the Deloitte Ethics Helpline could include, but are not limited to, suspected or potential:

- Discrimination
- Sexual harassment
- Workplace
- Substance abuse
- Conflicts of interest
- Inappropriate gifts and entertainment
- Inappropriate political activities and contributions
- Non-compliance with professional standards
- Insider information and securities trading
- Breaches of confidentiality
- Falsifying documents or violations of document retention policies
- Inappropriate personal use of Deloitte firm resources
- Theft
- Bribes and kickbacks
- Other potential violations of firm policies

How we use personal information

Personal information will be used for the following purposes:

- To evaluate your inquiry or incident, its seriousness and risk of harm to individuals, Deloitte, or third parties;
- To investigate your incident to obtain a better understanding of key facts and risks involved; and
- To seek to resolve the incident.

Disclosure of personal information

For one or more of the purposes outlined in the paragraph above, we may transfer personal information to:

- other members of the Deloitte organization;
- competent authorities, including courts and authorities regulating us, in each case to comply with legal or regulatory obligations or requests;

- third parties that provide services to us; in each case, such party will be contractually bound by confidentiality and privacy obligations consistent with the obligations in this Privacy Notice.

Please note that some of the recipients of the personal information referenced above may be based in countries that do not provide an adequate level of personal information protection under the applicable law. In such cases, we will ensure that there are adequate safeguards in place to protect personal information that comply with our legal obligations. The adequate safeguard might be a data transfer agreement with the recipient based on standard contractual clauses approved by the applicable authority for transfers of personal information to third countries.

Further details of the transfers described above, and the adequate safeguards used by us in respect of such transfers are also available from us. For such information, please contact the relevant Deloitte office location by using the "Contact information" section below.

The lawful basis for processing information

Depending on the applicable local laws, we use the personal information collected for the purposes outlined above because of: (a) our legitimate interests to protect against, improve, and take legitimate action regarding harm or risk to us, our personnel or third parties; (b) our legitimate interests in the effective and lawful operation of the Deloitte Ethics Helpline, so long as such interests are not outweighed by your interests; (c) the legal and regulatory obligations that we are subject to, such as providing information to a public body or law enforcement agency; or (d) your consent.

To the extent that we process any sensitive personal information relating to you for any of the purposes outlined, we will do so because either: (i) you have given us your explicit consent to process that data; (ii) the processing is required by law; (iii) the processing is necessary for the establishment, exercise or defense of legal claims or (iv) you have made the data manifestly public.

Information Security

We use a range of physical, electronic and managerial measures to keep your Personal Information secure, accurate and up to date.

Information retention and disposal

We will hold personal information for the longer of (i) as long as is necessary for the relevant activity or services; (ii) by local law; or (iii) the end of the period in which litigation or investigations might arise in respect of the inquiry or incident. Where personal information is no longer necessary or relevant for our identified purposes, we will securely dispose of the personal information.

Your rights

Under your local law, you may have various rights in relation to your personal information. For example, you may have a right to:

- obtain confirmation that we are processing your personal information and request a copy of the personal information we hold about you;
- ask that we update the personal information we hold about you, or ask that we correct such Personal Information that you think is incorrect or incomplete;
- ask that we delete personal information that we hold about you, or restrict the way in which we use such personal information;
- object to our processing of your personal information;
- obtain a copy of the personal information protection clauses governing data transfers in circumstances where we transfer personal information referenced above to countries that do not offer adequate personal information protection under applicable law; and]
- complain to the Data Protection Authority ("DPA) in your jurisdiction if you are unsatisfied with the way in which we have handled your Personal Information or any privacy query or request that you have raised to us.

Changes to this Privacy Notice

We may modify or amend this Privacy Statement from time to time at our discretion. When we make changes to this Notice, we will amend the revision date at the top of this page and such modified or amended privacy notice shall be effective as to you and your information as of that revision date. We encourage you to review this Privacy Notice periodically to be informed about how we are protecting your personal information.

Contact information

To exercise your rights or if you have any questions concerning your privacy in connection with our processing of your personal information, please use the applicable contact details for the relevant Deloitte office location listed below.