

## Privacy policy

### General Privacy Notice

Last revised: October 2023

This privacy notice applies to Deloitte AG and Deloitte Consulting AG with registered office address at Pfingstweidstrasse 11, 8005 Zurich, Switzerland, and the entities we own or control (“Deloitte”, “we”, “us” or “our”).

The controller on personal data is Deloitte. We are committed to protecting your information by handling it responsibly and safeguarding it using appropriate technical, administrative and physical security measures.

You are in general under no obligation to provide us with any information, however, if you do not provide the required information regarding certain use cases set out in this privacy notice, we may not be able to offer our services, process your corresponding request or get in contact with you, etc.

The privacy notice below explains what information we gather about you, what we use it for and who we share it with. It also sets out your rights and who you can contact for more information or queries.

If you are an employee, partner or independent contractor of Deloitte, please refer to the relevant Employee and Partner Fair Processing Notice or Associate (Independent Contractor) Fair Processing Notice and the Confidentiality, Privacy and Security Handbook, available on the Deloitte intranet for information on why and how your personal information is processed by Deloitte.

We may also process information you provide to us in connection with an application for a job vacancy, for the assessment of your application and potential negotiation, preparation, conclusion and performance of an employment or service contract with you or management of your profile (Art. 6 para. 1 lit. b GDPR). Please refer to the relevant job application privacy notice provided in our recruitment system.

[Download](#) this privacy notice as a PDF (updated October 2023).

### Service specific privacy notices

If you or an entity relevant to you uses Deloitte for any of the services below, you can click on the links for details about how we handle information about you in the relevant webpages in the service area:

- [Audit](#)
- [Consulting](#)
- [Financial Advisory](#)
- [Risk Advisory](#)
- [Tax and Legal](#)

The parties acknowledge that certain of the services may be performed by Deloitte acting as a controller and certain services may be performed by Deloitte acting as a processor instructed based on the data processing agreement. Each contract shall identify whether in each case it is the understanding of the parties that Deloitte carries out the particular services as a controller or a processor. In the absence of any such indication, the capacity in which Deloitte acts shall be determined in accordance with the Data Protection Legislation.

If these do not apply to you, then please consult the information in the privacy notice below.

#### Information about you that we process

We may process information about you that: (i) you provide to us, (ii) that we obtain from third parties or (iii) that is publicly available. This information may include your name, age, gender, date of birth and contact details. It may also include 'sensitive' or 'special categories' of personal data, such as dietary requirements or mobility information. For a more detailed description of the information about you that we may process, [please click here](#).

#### How we use information about you

We collect and process information about you and/or your business to enable us, Deloitte AG and Deloitte Consulting AG, and other members of the Deloitte Network to:

- provide our services to you or our clients;
- to enable us to provide you with information that we think may be of interest to you; and
- to meet our legal or regulatory obligations.

For a more detailed description of how we use information about you, [please click here](#).

When we send you information we think you might be interested in, you have the right to unsubscribe at any time by [contacting us](#) as set out here, or by following the unsubscribe instructions in our communications.

#### Sharing and transferring your information

We may share information about you across the Deloitte Network, and with some third parties. For more information [click here](#).

We may transfer some information about you to countries outside Switzerland or the European Economic Area ("EEA") that have less stringent data protection laws. When we do this, we will make sure your information remains adequately protected. For more information consult chapter "[Transferring your personal data](#)".

#### Your rights

Your rights under Data Protection Legislation include the right to:

1. request copies of your data;
2. request correction of your data;
3. request erasure of your data;
4. object to us processing your data; and
5. ask us to restrict the processing.

For more information about your privacy rights [click here](#).

If you have any questions or comments about privacy issues, or wish to exercise any of the rights set out above, please write to Data Protection Officer, Deloitte AG, Pfingstweidstrasse 11, 8005 Zurich, Switzerland, or email [chdataprivacy@deloitte.ch](mailto:chdataprivacy@deloitte.ch).

For more information about who you can contact about privacy, please [click here](#).

[Click here](#) to see the privacy notice in full, or click on the links below to take you to the more detailed sections of the notice.

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In this privacy notice:

**“Data Protection Legislation”** means (i) the Swiss Federal Act on Data Protection (“FDPA”) and (ii) the EU General Data Protection Regulation 2016/679 (“GDPR”); together with all other applicable legislation relating to privacy or data protection and including any statute or statutory provision which amends, extends, consolidates or replaces the same.

**“Deloitte Network”** refers to one or more of Deloitte Touche Tohmatsu Limited, a UK private company limited by guarantee (“DTTL”). DTTL and each of its member firms are legally separate and independent entities. Deloitte AG and Deloitte Consulting AG are companies registered in Switzerland with registered numbers CHE-101.377.666 and CHE-106.114.341 respectively, with registered office as [Pfingstweidstrasse 11, 8005 Zurich, Switzerland](#). Deloitte AG and Deloitte Consulting AG are affiliates of Deloitte NSE LLP, a member firm of the DTTL. Please see [www.deloitte.com/ch/about](http://www.deloitte.com/ch/about) for a detailed description of the legal structure of DTTL and its member firms.

**“Deloitte Subprocessors”** - list of potential Deloitte subprocessors is available here: [Deloitte Network Sub-Processors Lists](#) and any additional entity material to this instruction will be brought to your attention during services. Please kindly note that not all those entities are used in the provision of services to you. You can obtain more information updated periodically, we reserve the right to redact copies for data protection or secrecy reasons, or to produce excerpts only.

“**Processing**” means any operation performed on information about you, including to collect, disclose, record, organise, structure, store, alter, use, transfer, destroy or otherwise make available.

#### 1. Who this privacy notice applies to and what it covers

This privacy notice applies to Deloitte. We are committed to protecting your privacy and handling your information openly and transparently. This privacy notice explains how we will collect, handle, store and protect information about you when:

- providing services to you or our clients;
- you use our Website; or
- performing any other activities that form part of the operation of our business.

When we refer to “our Website” or “this Website”, we mean the specific webpages of deloitte.com designated as CH in the upper-right-hand corner, and to specific webpages with a URL starting:

- [www2.deloitte.com/ch](http://www2.deloitte.com/ch)
- [www.deloitte.ch](http://www.deloitte.ch)
- [blogs.deloitte.ch](http://blogs.deloitte.ch)
- <https://my.deloitte.com/?site=uk-en>

Our Website comprises various global, country, regional and practice-specific websites. Each of these is provided by Deloitte Touche Tohmatsu Limited (“DTTL”), or one of its independent member firms or their related entities (collectively, the “Deloitte Network”). To learn more about DTTL, its member firms, and their related entities, please see [About Deloitte](#).

This privacy notice also contains information about when we share your personal data with other members of the Deloitte Network and other third parties (for example, our service providers).

In this privacy notice, your information is sometimes called “personal data”. We may also refer to “processing” your data, which includes handling, collecting, protecting and storing it.

#### 2. About other areas of deloitte.com

The other country and regional websites contained within deloitte.com belong to other entities within the Deloitte Network and are not provided by us. Those websites, as well as other websites that may be linked to this Website, are not governed by this privacy notice. We encourage visitors to review the privacy notices on each of those other websites before disclosing any information.

#### 3. What personal data we collect

We may collect, record and use your personal data in physical and electronic form, and will hold, use and otherwise process that data in line with the Data Protection Legislation and as set out in this notice.

When we provide services to you or our clients and perform due diligence checks in connection with our services (or discuss possible services we might provide), we will process personal data about you. We may also collect personal data from you when you use this Website.

We may process your data because:

- you give it to us (for example, in a form on our Website such as the My Deloitte portal);
- other people give it to us (for example, your employer or adviser, or third-party service providers that we use to help operate our business); or
- it is publicly available.

We may also collect personal information if you register for the Website using a third party social network account (e.g., LinkedIn, Facebook, and Twitter). For example, the Website may allow you to login using your social network account credentials. We may collect the user name associated with that social media account and any information or content you have permitted the social media network to share with us, such as your profile picture, email address, and birthday.

The information we collect may depend on the privacy settings you have with the social network site, so please review the privacy notice or policy of the applicable social network site. When you access the Website through your social network account, you are authorising us to collect and use your information in accordance with this privacy notice.

We may process personal data from you because we observe or infer that data about you from the way you interact with us or others. For example, to improve your experience of this Website and to make sure that it is working effectively. For example, we (or our service providers) may use cookies on our website to ensure a user-friendly website visitor experience (e.g. session cookies), based on our legitimate interest (Art. 6 para. 1 lit. f GDPR). Enhanced web analysis using cookies is, within the scope of applicability of the GDPR, based on your consent (Art. 6 para. 1 lit. a GDPR). More information on how we use these and other tracking technologies – and how you can control them - can be found in our [cookie notice](#).

The personal data we process may include your:

- name, gender, age and date of birth;
- contact information, such as address, email, and mobile phone number;
- country of residence;
- lifestyle and social circumstances (for example, your hobbies);
- family circumstances (for example, your marital status and dependents);
- employment and education details (for example, the organisation you work for, your job title and your education details);
- financial and tax-related information (for example your income, investments and tax residency);
- postings or messages on any blogs, forums, platforms, wikis or social media applications and services that we provide (including with third parties);
- IP address, browser type and language, your access times;
- information in any complaints you make ;

- details of how you use our products and services;
- CCTV footage and other information we collect when you access our premises; and
- details of how you like to interact with us, and other similar information relevant to our relationship.

The personal data we collect may also include so called 'sensitive' or 'special categories' of personal data, such as details about you:

- dietary requirements (for example, when Deloitte would like to provide you with lunch during a meeting);
- health (for example, so that we can make it easy for you to access our buildings, products and services); and
- sexual orientation (for example, if you provide us with details of your spouse or partner).

We may also process personal data relating to ethnic or racial origin (for example, any multicultural networks you belong to), or about your political opinions (inferred from information you give us about political associations you belong to or have donated to).

We will typically seek separate permission from you in writing to process these special categories of personal data.

If you choose not to provide, or object to us processing, the information we collect (see section 11 below), we may not be able to process your instructions or continue to provide some or all of our services to you or our client.

#### 4. Personal data provided by or about third parties

If you share with us information regarding any other individual (e.g. your employees, colleagues, ultimate beneficial owners, relatives, etc.), you warrant (and shall procure that any member of your group/affiliates warrants) that the personal data to be transferred has been collected and processed in accordance with the requirements of the Data Protection Legislation and that the further processing and transfer of personal data by Deloitte as set forth in this privacy notice is admissible by the Data Protection Legislation. Particularly you warrant that prior to any transfer of this personal data you have provided any necessary notice and collected any necessary permission from affected individuals, verified technical and organisational measures and do all such other things as are required under the Data Protection Legislation in order to disclose personal data to Deloitte, Deloitte Network, its Subprocessors, and let them process and transfer this personal data outside Switzerland and the EEA for the services.

#### 5. How we use your personal data

We process information about you and/or your business to enable us and other members of the Deloitte Network to provide our services to you or our clients, and to meet our legal or regulatory obligations.

Some of your personal data may be used for other business purposes. Below are some examples.

#### ***Use of personal data to provide services to our clients***

We will use your personal data to provide you or our clients or other third parties with services, and this includes using your personal data in correspondence relating to those services. That correspondence may be with:

- you;
- other third parties or other members of the Deloitte Network;
- our service providers; or
- competent authorities.

We may also use your personal data to conduct due diligence checks relating to the services.

Because we provide a wide range of services to our clients or other third parties, the way we use personal data in relation to our services also varies. For example, we might use personal data about:

- a client's employees to help those employees manage their tax affairs when working overseas;
- a client's employees and customers in the course of conducting an audit (or similar activity) for a client; or
- a client to help them complete a tax return.

***Use of personal data for other activities that form part of the operation of our business***

We may also use your personal data in connection with:

- legal or regulatory requirements;
- requests and communications from competent authorities;
- client account opening and other administrative tasks;
- financial accounting, invoicing and risk analysis;
- relationship management, which may involve:

(a) sending you thought leadership or details of our products and services;

(b) contacting you for feedback on services;

(c) sending you event invitations; and

(d) other marketing or research purposes;

- recruitment and business development, which may involve:

(a) the use of testimonials from a client's employees as part of our recruitment and business development materials (with that employee's permission); and

(b) the use of third-party data sources to help us verify and improve the information we hold about key business relationships with individuals;

- services we receive from our professional advisors, such as lawyers, accountants and consultants;
- investigating or preventing security incidents; or
- protecting our rights and those of our clients.

***Use of personal data collected via our Website***

In addition to the above, we may also use your personal data collected via our Website:

- to manage and improve our Website;
- to tailor the content of our Website to give you a more personalised experience;
- to draw your attention to information about our products and services that may be of interest to you; or
- to manage and respond to any request you submit through our Website.

The processing regarding website use is based on our legitimate interest to operate and secure our website and our services, in particular for security reasons to ensure the stability and integrity of our systems (Art. 6 para. 1 lit. f GDPR). In addition, we may perform basic web analysis based on our legitimate interest (Art. 6 para. 1 lit. f GDPR) to optimize the website regarding usability and to gain insights about the use of our website and services. The collected data will not be merged with other personal data or disclosed to third parties. Enhanced web analysis using cookies is, within the scope of applicability of the GDPR, based on your consent (Art. 6 para. 1 lit. a GDPR).

**6. The legal grounds we use for processing personal data**

We are required by law to set out in this privacy notice the legal grounds on which we rely in order to process your personal data. We rely on one or more of the following lawful grounds:

- you have explicitly agreed to us processing your information for a specific reason;
- the processing is necessary to perform the agreement we have with you or to take steps to enter into an agreement with you;
- the processing is necessary for compliance with a legal obligation we have such as keeping records for tax purposes or providing information to a public body or law enforcement agency; or
- the processing is necessary for the purposes of a legitimate interest pursued by us or a third party, which might be:

(a) to provide our services to you or our clients and other third parties and ensure that our client engagements are well-managed;

(b) to prevent fraud;

(c) to protect our business interests;

(d) to ensure that complaints are investigated;



(e) to evaluate, develop or improve our services or products; or

(f) to keep you or our clients informed about relevant products and services and provide you with information, unless you have indicated at any time that you do not wish us to do so.

To the extent that we process any special categories of data relating to you for any of the purposes outlined above, we will do so because:

- you have given us your explicit consent to process that data;
- we are required by law to process that data in order to ensure we meet our ‘know your client’ and ‘anti-money laundering’ obligations (or other legal obligations imposed on us);
- the processing is necessary to carry out our obligations under employment, social security or social protection law;
- the processing is necessary for the establishment, exercise or defence of legal claims; or
- you have made the data manifestly public.

Please note that in certain circumstances it may be still lawful for us to continue processing your information even where you have withdrawn your consent, if one of the other legal bases described above is applicable.

## 7. Sharing your personal data

In connection with any of the purposes outlined in the “How we use your personal data?” section above, we may disclose details about you to:

- other members of the Deloitte Network or third parties that provide services or online platforms to us and/or the Deloitte Network;
- competent authorities (including tax authorities, courts and authorities regulating us and other members of the Deloitte Network) in Switzerland and abroad, if we are legally obliged or entitled to such disclosure or if it appears necessary to protect our interests);
- your employer and/or its advisers, or your advisers;
- anyone to whom we may transfer our rights and/or obligations under the [Terms of Use](#);
- any other person or organisation after a restructure, sale or acquisition of any member of the Deloitte Network, as long as they use your information for the same purposes we did;
- credit reference agencies or other organisations that help us make credit decisions and reduce the incidence of fraud;
- service providers (e.g. IT service providers, business information providers, newsletter service providers, marketing and event management service providers, etc.);
- legal and professional advisers, including accountants and auditors;
- other third parties that reasonably require access to personal data relating to you.

Our Website hosts various blogs, forums, wikis and other social media applications or services that allow you to share content with other users (collectively “Social Media Applications”). Any personal data that you contribute to these Social Media Applications can be read, collected and used by other users of the application. We have little or no control over these other users, so any information you contribute to these Social Media Applications might not be handled in line with this privacy notice.

#### 8. Transferring your personal data

Information we hold about you may be transferred outside Switzerland, to the countries that offer adequate data protection pursuant to the Data Protection Legislation, e.g. to the EEA, and under certain circumstances, we may also transfer data to the countries which do not offer adequate data protection (e.g. to US or India) if necessary for the respective processing purpose, e.g.:

- where we do business;
- which are linked to your engagement with us;
- from where you regularly receive or transmit information; or
- where our Subprocessors or third parties conduct their activities.

These countries may have less stringent privacy laws than we do, so any information they hold can become subject to their laws and disclosure requirements, including disclosure to governmental bodies, regulatory agencies and private persons. In addition, a number of countries have agreements under which information is exchanged with other countries for law enforcement, tax and other purposes.

When we, or our permitted third parties, transfer your personal data, we will assure the transfer is secured by appropriate safeguards such as the EU Standard Contractual Clauses, or based on a statutory exemption (e.g. if you have given your consent to the transfer) and we will impose contractual obligations on the recipients of that data to protect your personal data to the standard required by the Data Protection Legislation.

If we transfer your personal data outside Switzerland in other circumstances (for example, because we have to by law), we will make sure it remains adequately protected.

We may share non-personal, anonymised and aggregated information with third parties for several purposes, including data analytics, research, submissions, thought leadership and promotional activity.

#### 9. Protecting your personal data

We use a range of measures to ensure we keep your personal data secure, accurate and up to date. These include:

- education and training to relevant staff to ensure they are aware of our privacy obligations when handling personal data;
- administrative and technical controls to restrict access to personal data to a ‘need to know’ basis;
- technological security measures, including fire walls, encryption and anti-virus software; and
- physical security measures, such as security passes to access our premises.

The transmission of data over the internet (including by e-mail) is never completely secure. So although we use appropriate measures to try to protect personal data, we cannot guarantee the security of data transmitted to us or by us.

#### 10. How long we keep your personal data for

We seek to ensure that we only keep your personal data for the longest of:

- the period necessary for the relevant activity or services;
- any retention period that is required by law; or
- the period in which litigation or investigations might arise in respect of the services.

#### 11. 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;
- be informed about the processing of your personal data (i.e. for what purposes, what types, to what recipients it is disclosed, storage periods, any third party sources from where it was obtained, confirmation of whether we undertake automated decision-making, including profiling, and the logic, significance and envisaged consequences);
- 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; withdraw consent to our processing of your personal data (to the extent such processing is based on previously obtained consent);
- receive a copy of the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and to transmit such personal data to another party (to the extent the processing is based on consent or a contract);
- ask us to stop or start sending you marketing messages at any time by using the contact details in section 13 below; and
- object to our processing of your personal data.

If you would like to access or see a copy of your personal data, you must ask us in writing. We will endeavour to respond within a reasonable period, and in any event within one month in line with the Data Protection Legislation. We will comply with our legal obligations as regards your rights as a data subject.

To help us ensure that your information is up to date, let us know if any of your personal details change using the contact details set out in section 13.

You may also use the contact details in section 13 if you wish to make a complaint relating to your privacy.

#### 12. Sending you marketing information

We and other members of the Deloitte Network may process marketing data for marketing purposes and relationship management, for example to send personalized advertising for our services and products, e.g. in the form of newsletters or other regular contacts either in person, via e-mail or other electronic form, by phone or any other communication channel for which we have contact information from you and by any other marketing means (e.g. through events, fairs, etc.). We do so based on our legitimate interest to keep you informed about our products and services (Art. 6 para. 1 lit. f GDPR), to the extent permitted by applicable marketing regulations, or, where required, based upon your consent in this regard (Art. 6 para. 1 lit. a GDPR).

You may, at any time, ask us and/or other members of the Deloitte Network not to send marketing information to you by following the unsubscribe instructions in communications from us, or contacting us in the way described in section 13 below.

### 13. Contact

If you wish to exercise any of the rights relating to your information set out above, or if you have any questions or comments about privacy issues, or you wish to raise a complaint about how we are using your information, you can contact us in the following ways:

- write to the **Data Protection Officer** - Deloitte AG Data Privacy Team, Deloitte AG, Pfingstweidstrasse 11, 8005 Zurich, Switzerland
- send an **email to [chdataprivacy@deloitte.ch](mailto:chdataprivacy@deloitte.ch)**

If you believe that our processing of your data contradicts the applicable data protection laws, you have the possibility to lodge a complaint with the appropriate data protection authority. The data protection authority in Switzerland is the Federal Data Protection and Information Commissioner, Feldeggweg 1, 3003 Berne, Switzerland <https://www.edoeb.admin.ch>. Based on your residence, you may have the possibility to lodge a complaint with the other appropriate data protection authority, e.g. the EU Data Protection Authority in [your jurisdiction](#).

Our Representative in the EU according to the Regulation (EU) 2016/679 (General Data Protection Regulation) is Deloitte UK Privacy (EU Rep) Limited, 29 Earlsfort Terrace, Dublin 2, Ireland. Send an email to [chdataprivacy@deloitte.ch](mailto:chdataprivacy@deloitte.ch).

### 14. Changes to this privacy notice

This privacy notice does not form part of any contract with you and we may amend it at any time. The version published on our website is the version that currently applies. We encourage you to review this privacy notice periodically to remain informed about how we are protecting your information.