

## Deloitte University EMEA Privacy Policy

Last modification: 4 April 2024

### Introduction

This Privacy Policy Charter (hereinafter referred to as the "Charter") sets out how we use information about you that we collect directly or indirectly (hereinafter referred to as "personal data"), and the measures we take to protect it. It also defines your rights regarding your personal data and the contact point for obtaining further information on the processing we carry out or for exercising your rights.

Please click on the links below to find out more about you:

## **Processing operations covered by the Personal Data Protection Charter**

#### Who is responsible for the processing operations we carry out?

This Privacy Policy applies to the processing of personal data by Deloitte University EMEA (hereinafter "Deloitte University EMEA", "DU EMEA", "we", "us" or "our"), acting as data controller. The data controller can be contacted at the following address: Deloitte University EMEA, 6 place de la Pyramide, 92908 Paris La Défense Cedex.

Deloitte University EMEA is the glue that binds the region's professionals together through exceptional and memorable development experiences, based on our Deloitte strategy, our shared values and our goal - "to make an impact that matters".

The Deloitte EMEA University programmes offers participants the best possible professional experience, with an immersive experience in an exceptional location (respectful of the environment) and with the intervention of several speakers to train you for tomorrow's world.

So, to meet the development needs of professionals and future leaders in 110 countries, the design and content of our programmes are applicable on a global scale, with a clear and appropriate language, promoting respect, diversity and inclusion.

To find out more about Deloitte University EMEA, please go to « about Deloitte University EMEA ».

#### Who are the persons concerned by the processing of personal data that we carry out?

The persons concerned by our data processing operations are:

- our customers/ participants//visitors, their employees and/or customers and/or suppliers, and/or partners, and/or service providers
- our prospects
- Our facilitators or suppliers, their employees and/or service providers, and/or partners.

(hereinafter together and individually "you", "your", "yours")

#### Why do we process your personal data?

We collect, process, store and protect your personal data when:

- we provide professional services to you (including your employees);
- we use you as a service provider, partner or subcontractor;
- we carry out any other operation relating to our generic offers or customer proposals in terms of services or sectors.

# The collection, purposes and basis for the processing of your personal data

#### **Customers / Participants / Visitors:**

As part of the services we provide to you or our customers, and in connection with our internal procedures and due diligence, or as the case may be, during our pre-contractual exchanges concerning the services we may provide to you, we may collect and use personal data concerning you.

The table below describes the personal data we may use when acting as data controller for the purposes set out below.

Collected data	Purposes	Legal basis
Contact data:  Last name, first name, e-mail address used for business purposes, telephone number used for business purposes  Visa letter (word document	relating to our services and the organization of the training courses we	Performance of a contract: to provide you with an efficient service, in line with our contractual obligations, and to put in place all the elements necessary for the proper organization of assignments.
containing Passport number, Delivery and expiry date)".  Professional data:	<ul> <li>Meet applicable legal and regulatory requirements;</li> </ul>	Our legal and regulatory obligations (such as keeping records for tax purposes, providing information to a

Company you work for and position you hold

#### Travel data:

Any other personal data, concerning you or third parties, that you transmit to us as part of the provision of our services or pre-contractual exchanges.

- Respond to requests for information from competent authorities to which Deloitte University EMEA may be subject;
- Administrative, accounting and financial management, including billing for our services;
- o Management of the business relationship, including: (i) sending you information about our products or services that may be of interest to you; (ii) sending you a message to ask for your opinion about our products or services; or (iii) contacting you for other professional or commercial purposes related to your activities;
- administration and support of IT tools used in our activities (e-mail, tools dedicated to training and organizing your visit to DUE EMEA);
- Hosting and maintenance of these IT tools, archiving and reprographics;
- Professional services that may be provided to us by our own experts or advisors, such as lawyers, accountants or consultants;
- Protecting our rights and those of our customers;

Respond to requests for public body, combating money information from laundering).

Our legitimate interest :

- →To exercise or defend your or our rights, in accordance with applicable legal provisions.
- →To prevent fraud and safeguard our information systems.

	o Combating personal data breaches, by implementing tools to prevent and guard against any security breach resulting in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed.	
Sensitive data :  Such as information about your health and diet (allergies or food preferences)	When necessary, so that we can make the necessary arrangements for you during your visit to DUE EMEA.	Performance of a contract
Image capture	To enable us to:  Secure the premises (people and property): To enable us to secure the building. Cameras are deployed at all public spaces, including entrances and exits, emergency exits and traffic lanes, as well as storage areas (furniture and consumables);  Gather your feedback on your stay at Deloitte Université EMEA;	<ul> <li>→ Performance of a contract;</li> <li>→ Legal obligation</li> <li>→ Legitimate interest: To gather your feedback on your experience;</li> </ul>

#### **Prospects**

When you participate/register for an event hosted at the Deloitte University EMEA, the personal data you provide is processed by our Marketing team as data controller for strictly internal use.

Collected data	Purposes	Legal basis
Contact data :		Our legitimate interest in promoting our services.
Last name, first name, e-mail	<ul> <li>Contact you for future</li> </ul>	
address used for business	events organized by	

purposes, telephone number	Deloitte University	
used for business purposes.	EMEA or one of its	
Due feesie wal date.	partners,	
Professional data :	o contact you to propose	
Company you work for and	services that may be of	
position you hold	interest to you,	
-		

## Facilitators / Suppliers

As part of the services you provide, we may collect and use personal data about you.

Collected data	Purposes	Legal basis
Contact data :		Performance of a contract: Contractual obligation to put in
Last name, first name, e-mail	<ul> <li>Organize the services,</li> </ul>	place all the necessary
address used for business		elements to guarantee proper
purposes, telephone number		performance of the service.
used for business purposes	EMEA or for our clients;	performance of the service.
and the state of t		Our legal and regulatory
Visa letter (word document		obligations (such as keeping
containing Passport number,		records for tax purposes,
Delivery and expiry date)".	requirements;	providing information to a
, ,	·	nublic hody combating money
Professional data :	Respond to requests for	laundering)
	information from	ladriaering).
Company you work for and	competent authorities	Our legitimate interest :
position you hold	to which Deloitte	2
	University EMEA may be	→To exercise or defend your or
Travel data :	_	our rights, in accordance with
	_	applicable legal provisions.
Any other personal data,	<ul> <li>Administrative,</li> </ul>	
concerning you or third parties,	accounting and financial	→To prevent fraud and
that you transmit to us as part	management, including	safeguard our information
of the provision of our services	payment of your	systems.
or pre-contractual exchanges.	services;	
	<ul> <li>Management of the</li> </ul>	
	business relationship,	
	including: (i) sending	
	information or inquiries	
	about our needs; (ii)	
	contacting you for other	
	professional or	
	commercial purposes	

	rolata	d to your	İ
	activit	d to your ies:	
		dministration and	
		rt of IT tools used	
		course of your	
	work;		
	o Hostir	ng and	
	maint	enance of these IT	
	tools,	archiving and	
	repro	graphics;	
	o Profes	ssional services	
	that m	nay be provided to	
	us by	our own experts	
	or adv	isors, such as	
		rs, accountants or	
	consu	ltants;	
	o Prote	ting our rights	
		ose of our service	
	provid	lers;	
	Caral		
		ating personal	
		reaches, by menting tools to	
	•	nt and guard	
	•	st any security	
	_	n resulting in the	
		ntal or unlawful	
	destru	ıction, loss,	
	altera	tion, unauthorized	
	disclo	sure of, or access	
	•	rsonal data	
		nitted, stored or	
	other	wise processed.	
Sensitive data :	When necess	ary, so that we can	Performance of a contract
	make the nec		
Such as information about your	arrangements	for you during	
	your visit to D	UE EMEA.	
food preferences)			
Image capture	To enable us	TO:	→ Performance of a contract;
	o Secur	e the premises	→ Legal obligation
		le and property) :	
		able us to secure	→ <i>Legitimate interest</i> : To gather
			your feedback on your
		1 7	experience ;
	entrar	nces and exits,	

emergency exits and traffic lanes, as well as storage areas (furniture and consumables);	
<ul> <li>Gather your feedback on your stay at Deloitte Université EMEA;</li> </ul>	

### To whom we communicate your personal data?

#### Who may receive your personal data?

For any of the purposes mentioned in the section "Collection and processing of your personal data" above, we may communicate your personal data to:

- our service providers: external service providers that we may use to provide services
  to our customers or for our communications and marketing activities, software
  publishers that we may use to provide our services, hosting providers, IT service
  providers that support and maintain our systems, service providers that we use to
  protect us against breaches, etc;
- our advisors, including insurers, brokers, auditors and lawyers;
- any competent administrative or judicial authority;
- your employer;
- your advisors, including insurers, brokers, auditors and lawyers;

We inform you that certain recipients of your personal data mentioned above may reside in a country other than a Member State of the European Union or the European Economic Area, whose laws and regulations do not provide the same level of protection for personal data. In such cases, we will ensure that the safeguards put in place to protect your personal data comply with the legal obligations in force within the European Union, and we will put in place appropriate safeguards to secure the transfer of data, such as the implementation of Binding Corporate Rules (BCR), the conclusion of a data transfer contract with the recipient including the standard contractual clauses approved by the European Commission for the purpose of transferring personal data to third countries.

### Social networking applications and services

Any personal data or other information disclosed through social network applications or services may be read, collected and used by users of these social networks. We have little or no control over these other users. As a result, we cannot be held responsible for the use, misuse or misappropriation of your personal data by another user of these social networks.

## Technical and operational measures to protect your personal data

We use a set of technical and organizational measures to protect your personal data, process them lawfully, fairly and transparently, and guarantee a level of security appropriate to the risk.

#### These measures includes:

- IT security measures to protect against attacks and breakdowns, including firewalls, encryption, anti-virus and anti-malware software, and tools to prevent cyber-attacks and personal data breaches;
- Physical security measures to protect our premises;
- Limiting access to personal data to only those personnel who need to know it for one or other of the aforementioned purposes;
- The existence of internal policies, in particular for managing requests to exercise rights and adapting procedures for handling confidentiality incidents;

Although Deloitte University EMEA takes all appropriate security measures at the time of collection of your personal data and in connection with any processing of personal data, the transmission of data over the Internet (including e-mail) is never completely secure.

## How long we keep your personal data

We will keep your personal data on our systems for the longer of the following periods:

- 1. the period necessary to fulfill the purpose or purposes for which the data was collected;
- 2. the retention, archiving and limitation periods laid down by law or regulation;
- 3. the end of the limitation period applicable following a dispute or investigation in connection with one of our services.

## Your rights

What are your rights?

- Obtain confirmation that we are processing your personal data and obtain a copy of the personal data we hold about you;
- Ask us to update the personal data we hold about you or to correct inaccurate or incomplete personal data;
- Ask us to delete the personal data we hold about you, or to limit the use we make of it;
- Withdraw your consent for us to process your personal data (insofar as such processing is subject to consent);
- To the extent required by applicable law or regulation, receive a copy of the personal data you have provided to us, in a structured, commonly used and machine-readable form and for the purpose of transferring it to another party (to the extent that such

processing is subject to consent or contract) or object to the processing of your personal data (to the extent that such processing is based on our legitimate interest);

• Define how your personal data will be used after your death.

#### How to exercise your rights?

- If you no longer wish to receive marketing or sales literature from us, please click on the unsubscribe link in any communication email or send an email to:

  dpo.duemea@deloitte.com
- If you have any other questions about how we use your personal data, how to exercise your rights or how to make a complaint, you can contact our Data Protection Officer ("DPO") at the following address: <a href="mailto:dpo.duemea@deloitte.com">dpo.duemea@deloitte.com</a>
- For any unsuccessful questions or requests you may submit to the Commission Nationale de l'Informatique et des Libertés ("CNIL"), located at 3 Place de Fontenoy TSA 80715 75334 PARIS CEDEX 07.

## **Changes to this Privacy Policy**

We may modify this Privacy Policy from time to time, in particular as a result of changes in legislation and/or regulations and internal policies concerning the protection of your personal data.

If we make changes to this Privacy Policy, we will change the revision date at the top of the page. The modified version of this Charter will be applicable as of that date. We therefore encourage you to consult this Charter regularly to keep informed of how we protect your personal data.