

Limited Controller Privacy Notice

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Introduction

This Privacy Notice explains how Deloitte¹ (also referred to below as “we”, “us” or “our”) uses the personal information collected from your use of the Application that links to this Privacy Notice (the “Application”). By using the Application, you agree to

the use of your personal information in accordance with this Privacy Notice. As used in this Privacy Notice, **“Deloitte Network”** refers to one or more of Deloitte Touche Tohmatsu Limited, a UK private company limited by guarantee (**“DTTL”**), its network of member firms and their related entities. DTTL and each of its member firms are legally separate and independent entities.

¹ In this notice, “Deloitte” refers to Deloitte LLP, Deloitte Consulting LLP, Deloitte Financial Advisory Services LLP, Deloitte Tax LLP, Deloitte Transactions and Business Analytics LLP, Deloitte & Touche LLP, Deloitte Services LP, and Deloitte Corporate Finance LLC and their respective affiliates.

We offer the Application for use by the Deloitte Network firms and their respective clients. This Privacy Notice covers your use of the Application and the limited processing of personal information that we perform for our own purposes as a data controller as described below. This Privacy Notice does not apply where we process your personal information on behalf of another Deloitte Network firm as a data processor/service provider. If you have questions about the processing of your personal information or wish to exercise your personal information rights in connection with your use of the Application where we act as a data processor/service provider, please contact the Deloitte Network firm that decided to grant you access to use the Application, or refer to its privacy notice.

Personal information which we process as a controller through the Application

We collect the personal information you provide when accessing the Application (such as your name or email address).

The Application also collects standard Internet log information including your IP address, browser type and language, access times and referring website addresses. To ensure that the Application is well managed and to facilitate improved navigation, we or our service provider(s) may also use cookies (small text files stored in a user's browser) or Web beacons (electronic images that allow us to count users who have accessed particular content and to access certain cookies) to collect aggregate data. Additional information on how we use cookies and other tracking technologies and how you can control these can be found in our [Cookie Notice](#).

How we use information about you

Your personal information collected by the Application as mentioned above may be used for the following purposes: (i) to create internal metrics related to the Deloitte Network and usage of the Application by entities of the Deloitte Network; (ii) to analyze and understand overall Application traffic information; (iii) to make

improvements to the Application; (iv) to conduct analytics and benchmarking; and (v) to monitor and log Application usage.

To the extent that we possess any personal information about you that has been de-identified, we maintain and use such de-identified information without re-identifying such information. Such deidentified information is not subject to the terms of this Privacy Notice.

Disclosure of personal information to third parties

For one or more of the purposes outlined in the paragraph above, we may transfer personal information to other members of the Deloitte Network and/or third parties that provide services to us and/or the Deloitte Network.

All of these disclosures may involve the transfer of personal information to countries or regions without data protection rules similar to those in effect in your area of residence. In such cases, we will ensure that there are adequate safeguards in place to protect your 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.

The lawful basis for processing information as a Controller

We use your personal information for the purposes outlined above because of: (a) our legitimate interests in the effective delivery and improvement of the system; (b) our legitimate interests in the effective and lawful operation of the system; and (c) measuring content usage and understanding system performance impacts; so long as such interests are not outweighed by your interests.

Selling of information

We do not sell your personal information that is collected under this Privacy Notice.

Information retention

We retain personal information as reasonably necessary for the duration of the purposes outlined in this Privacy Notice. Notwithstanding the duration of the purposes, we may retain your information if necessary to comply with our legal or professional obligations, enforce our agreements, or resolve disputes.

Your personal information rights

You may have choices about how your personal information is collected, used and shared. Depending on the jurisdiction in which you are located, you may have the right to request that we confirm whether we process your personal information or that we correct, delete, or stop processing your personal information. You may also

have the right to request that we provide the following information regarding the personal information we hold about you:

- The categories and/or specific pieces of personal information we collected
- The categories of sources from which personal information is collected
- The business or commercial purpose for collecting personal information
- The categories of third parties with whom we shared personal information

To exercise any of your rights under applicable law described above regarding your personal information, complete our [Personal Information Request Form](#) or call us at +1.844.919.0711. When completing the Personal Information Request Form, please let us know the name of your company and the Application you are using when asked to describe your relationship with us. When calling us, please provide your full name, mailing address, email address, the name of your company, the name of the Application you are using and the specific type of request you are making. You may also appeal a denial of your request completing the [Personal Information Request Appeal Form](#).

Applicable laws may also give you the right to lodge a complaint with a local supervisory authority related to this Privacy Notice.

We will not discriminate against you for exercising any of your rights with respect to your personal information.

Verification of Personal Information Request

For certain personal information requests, we must first verify your identity before processing your request. To do so, we may ask you to provide us with your full name, contact information, and relationship to us. Depending on your request, we may ask you to provide additional information. Once we receive this information, we will then review it and determine whether we are able to match it to the information we maintain about you to verify your identity.

Third Party Requests

If you are submitting a personal information request on behalf of someone other than yourself, please complete our Personal Information Request Form and include proof that you are authorized to make the request. This may be in the form of a written authorization signed by the person whom you are acting on behalf of or a valid power of attorney.

Special notices to California residents

If you are a California resident, you are entitled to request information concerning any personal information you provide to us as part of an established business relationship for personal, family, or household purposes that we disclose to nonaffiliated third parties for their direct marketing purposes. We do not share such personal information with nonaffiliated third parties for such purposes.

Washington State Consumer Health Data Privacy Policy

For information about how we use consumer health data that is subject to the Washington State My Health My Data Act, see our [Washington State Consumer Health Data Privacy Policy](#).

Do Not Track

"Do Not Track" is a preference you can set in your web browser to let the websites you visit know that you do not want them collecting information about you. The Application does not currently respond to a "Do Not Track" or similar signal.

Information security

We have in place reasonable commercial standards of technology and operational security to protect all personal information provided by users with respect to the Application from unauthorized access, disclosure, alteration or destruction.

Changes to our Privacy Notice

In addition to describing our current privacy practices, this Privacy Notice also describes the categories of personal information we collected, disclosed, or sold during the preceding 12 months. We may modify or amend this Privacy Notice from time to time at our discretion. When we make changes to this Privacy 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 periodically review this Privacy Notice to view any updates.

Contact information

If you have questions or concerns regarding your privacy while using the Application, please contact us at USPrivacyQuestions@deloitte.com or call us at +1.844.919.0711. When emailing or calling us, please also provide us with your full name, the name of your company, and the name of the Application you are using.