

## Data Analytics Privacy Notice

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### **Introduction**

This Privacy Notice describes how Deloitte<sup>1</sup> (also referred to below as “we”, “us”, or “our”), which is part of the Deloitte Network, processes information about individuals in connection with our performance of data analytics services that include providing our clients with personal information collected or derived by us or provided to us by third party data providers (collectively, the “Services”). For example, the Services may include the delivery of insights relating to: attendance likelihoods and financial aid options of applicants for university admissions, charitable donation interests, employment candidate identification, health risk probability predictions for individuals, models to predict who might be eligible for government benefit programs, qualification and purchase likelihoods for consumers of life insurance products, other areas of consumer purchase behaviors,

and background investigations of individuals relating to prospective business transactions, third-party relationships, investments, internal investigations, and business disputes (collectively, “Insights”). The Services exclude data analytics services performed on personal information provided to us solely by or on behalf of our clients. Please review the [Deloitte.com Privacy Notice](#) to learn how personal information is used and shared when it is collected by the Deloitte.com website or in certain other circumstances unrelated to the Services.

As used in this Privacy Notice, the “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.

<sup>1</sup> In this notice, “Deloitte” refers to: Deloitte Consulting LLP and Deloitte Financial Advisory Services LLP

### **Information collection**

We may collect the following personal information about you from our current or potential clients, publicly available sources, or third parties, such as data brokers:

- Name
- Home address
- Email address
- Phone number
- Age or birth year
- Gender
- Number of children
- Demographic information, such as household composition and marital status
- Financial information, such as ownership of credit or debit cards, investment types, information about your home, and household adjusted gross income
- Charitable donation information
- Academic information, such as institutions attended, standardized test scores, high school GPA, and financial aid offers
- Staffing agency status for potential candidates

- Due diligence information, related to fraud investigations, business affiliations, litigations, and bankruptcies
- Sensitive personal information, such as data relating to racial or ethnic origin; national origin; immigration or citizenship status; religious or philosophical beliefs; trade union membership; political opinions; status as victim of a crime; status as transgender or non-binary; or sexual orientation
- Other information from data brokers, including your hobbies and interests, such as purchasing habits, music preferences, outdoor recreational activities and indoor activities

### **Information use**

We may collect and use your personal information as part of our Services to identify you and generate Insights utilizing our proprietary analytics models and/or criteria provided by our clients.

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 de-identified information is not subject to the terms of this Privacy Notice.

### **Selling of information**

NOTICE: As part of our Services, we may sell your sensitive and other personal information to our clients. Depending on the jurisdiction in which you are located, you may have the right to request that we not sell personal information we hold about you. To do so, please visit our [How to Request that We Limit the Sale or Use of Your Personal Information](#) web page.

### **Information retention**

We retain your personal information for as long as the information is reasonably needed for the purposes described in this Privacy Notice. We also may retain your personal information to comply with our legal or professional obligations, enforce our agreements, or resolve disputes.

### **Disclosure of information to third parties**

We may provide your personal information to our clients to assist them in their marketing and sales of their products and services and to assist them to identify and minimize their risks.

We may provide your personal information to third parties, such as data brokers, to identify you in order to collect additional personal information about you for use in our services.

All categories of your personal information may also be disclosed:

- To members of the Deloitte Network and other third parties: in order to respond to your requests or inquiries; as part of a corporate transaction (such as a sale, divestiture, reorganization, merger or acquisition); or where those parties handle information on our behalf
- To law enforcement, regulatory or other government agencies, or to other third parties, in each case, to comply with legal, regulatory, or national security obligations or requests

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.

### **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 or selling personal information
- The categories of third parties with whom we shared personal information
- The categories of personal information we sold about you and the third parties to whom the personal information was sold

To exercise any of your rights under applicable law described above regarding your personal information, please complete our [Personal Information Request Form](#) or call us at this toll-free number +1.844.919.0711. When calling us, please provide your full name, mailing address, email address and the specific type of request you are making. You may also appeal a denial of your request by 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.

Please see [Deloitte's annual personal information request metrics](#) for more information.

### **Verification of personal information requests**

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 Deloitte. 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 Deloitte maintains 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 collect any personal information directly from you as part of our Services. Therefore, we do not have any such personal information to share 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](#).

### **Texas data broker registration**

The entity maintaining the websites and/or mobile applications linked to this privacy notice is a data broker under Texas law. To conduct business in Texas, a data broker must register

with the Texas Secretary of State (Texas SOS). Information about data broker registrants is available on the Texas SOS website.

### **Information security**

We have in place reasonable commercial standards of technology and operational security to protect all personal information collected from unauthorized access, disclosure, alteration or destruction.

### **Children's privacy protection**

We understand the importance of protecting children's online privacy. Our Services are not designed for or intentionally targeted at children under the age of 13. It is not our policy to intentionally collect or maintain information about anyone under the age of 13. If we obtain actual knowledge that we have received such information, we will take steps to delete it.

### **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 any questions or concerns regarding your privacy in relation to the Services, please contact us at [USPrivacyQuestions@deloitte.com](mailto:USPrivacyQuestions@deloitte.com) or call us at +1.844.919.0711.