

DBoard Privacy Statement

Last revised: 19 September 2019

This privacy statement (hereinafter referred to as “**Privacy Statement**”) applies to the platform DBoard (hereinafter referred to as “**DBoard**” or the “**Platform**”) which comprises several applications and features, accessible via a website which is entirely owned by Deloitte Tax & Consulting, *société à responsabilité limitée* and hereinafter referred to as “**Deloitte Luxembourg**”, “**we**”, “**us**” or “**our**”. It explains what information relating to an identified or identifiable natural person (“**Personal Data**”) we gather about you as individual user of the Platform (“**User**”, “**you**”, or “**your**”), what we use these Personal Data for and who we share these Personal Data with, **when we are acting as a data controller for these data**. It also sets out your rights as individuals in relation to Personal Data and whom you can contact for more information or queries.

For the avoidance of doubt, it is explained to the Users that the Platform allows you to create, upload, share, store and in general process documents and other types of information, which may contain Personal Data belonging to third parties. Such Personal Data will not be processed by Deloitte Luxembourg for the purpose of providing the Platform to you and are thus not included in the scope of this Privacy Statement. If you wish to obtain more information about how Deloitte Luxembourg and other members of the Deloitte Network¹ in Luxembourg process Personal Data, not in relation to this Platform but in the context of the provision of their services, please refer to the General Privacy Statement available on our web site (<http://www.deloitte.com/lu/privacy>).

1. General

In order to provide you as the User with the access to and use of the Platform and to meet our legal and regulatory obligations, Deloitte Luxembourg must ask you to provide certain information about yourself. This Privacy Statement describes the Personal Data we collect and how that information is used.

By using our Platform and/or submitting your Personal Data to it, as User you acknowledge having read and understood the terms of this Privacy Statement.

If as User of the Platform you upload here Personal Data of other persons, you should ensure that these other persons have been adequately informed regarding the sharing of their Personal Data with Deloitte Luxembourg and that this Privacy Statement has been brought to their attention.

If you, as a User, do not wish to share your Personal Data with Deloitte Luxembourg so that we can process those data as further explained in this Privacy Statement, please do not sign up for, log in and/or continue using the Platform.

2. What type of Personal Data we collect and use

- **Your contact details** such as your first and last names; professional e-mail address; professional title; name of employer;
- **Technical data** such as your IP address; your browser type and language; devices used; localisation data deriving from your public IP;

¹ Deloitte Network refers to Deloitte Touche Tohmatsu Limited, a UK private company limited by guarantee (“DTTL”), its member firms and their respective subsidiaries and affiliates (including Deloitte Luxembourg), their predecessors, successors and assignees, and all partners, principals, members, owners, directors, employees, subcontractors and agents of all such entities.

- **Communication data** related to your requests towards us and how you interact with other users of the Platform;
- **Metadata**, which may result from your use of the Platform; the login time, navigation trace and access logs.

For your complete information, we may also have access to Personal Data that you as a User upload on the Platform depending on the use you will make of it. Examples of such Personal Data may include contact details, professional information or identification information of persons mentioned by you in documents posted throughout your use of the Platform. Such Personal Data will not be used by Deloitte Luxembourg for the provision of the Platform, they pertain to their owner (you, your organisation or other third parties) and Deloitte Luxembourg has not control over them. It is up to you to make sure that you have collected such data lawfully and in a transparent manner and you have all authorisations needed for you to be able to share them with Deloitte Luxembourg.

We understand the importance of protecting children's privacy. The Platform is **not designed for, or intentionally targeted at, children**. It is not our policy to intentionally collect or store information about children and the User should **not upload minors' Personal Data** on the Platform.

3. How we use your Personal Data and on which legal grounds

Deloitte Luxembourg will use your Personal Data in order to create your user profile and grant you access to the Platform. We may also use your Personal Data to administer the Platform and provide you with support, problem-solving and maintenance of your profile and your use of the Platform.

From time to time, we might contact you to get your feedback on the use of the Platform and your satisfaction over its features and capabilities. Information regarding your use of the Platform will be used by Deloitte Luxembourg in order to improve the Platform and our related services to you and to provide you with a more user-friendly experience.

For security reasons we may also store data related to your use of the platform, so that we are able to trace your navigation, restore information or revert to previous versions as well as to provide you with review history and performed modifications.

We may also use your Personal Data for the purposes of, or in connection with protecting our rights and those of our clients or even User's rights, mainly in case of complaints and (potential) litigation associated to the Platform use.

4. Disclosure of your Personal Data to third parties

We may provide your Personal Data to other entities within the Deloitte Network or to our service providers, who assist us with the maintenance and hosting of the Platform. We may also need to disclose Personal Data if required to do so by law, a regulator or during legal proceedings.

Your Personal Data may be transferred to, and stored at, other entities within the Deloitte Network and/or service providers operating within or outside of the European Economic Area, however in such cases we will make sure that adequate safeguards are in place to protect your Personal Data and such transfers will be performed at all times in compliance with applicable data protection legislation and in particular the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data ("GDPR").

Further details of the transfers described above and the adequate safeguards used by Deloitte Luxembourg in respect of such transfers are available by contacting our Data Protection Officer (DPO) at DataPrivacy@deloitte.lu.

5. Log information and cookies

Cookies are small files of data that reside on the User's computer and allow us to recognise the User as a user if he/she returns to our Platform using the same computer and browser (e.g. to display the User's email address on his/her log-in form, so that the User doesn't have to retype the email address every time he/she logs in to our Platform). We also use cookies for single sign on (SSO) between the various applications hosted in the Platform; this avoids that you need to input your credentials when navigating between applications within the Platform.

The User is free to decline our cookies in the web browser settings, but doing so may interfere with the User's efficient use of our Platform or might as well make some features not available. The User may also delete any session cookies after using the Platform.

With respect to the Platform, we only use session cookies, which do not include any Personal Data, except the session token, and are of temporary nature (not retained for longer than 8 hours).

6. Linked sites

The Platform may host links to other websites. Such sites are outside of our control and governed by their own privacy statements and we are not responsible for their operation. If the User uses any such linked sites, the User should consult the privacy policies posted on those websites before disclosing any Personal Data.

7. Your rights in respect of your Personal Data

You as the User have various rights in relation to these Personal Data. In particular, you have the right to:

- obtain confirmation that we are processing your Personal Data and request a copy of the Personal Data we hold about you;
- ask that we update the Personal Data we hold about you, or correct such Personal Data that you think are 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 in specific circumstances provided by law and especially if there is no longer a need to process your Personal Data or if we no longer have a valid legal ground to process them;
- receive a copy of their Personal Data, when directly 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 and we are acting as data controller);
- object to our processing of your Personal Data based on legitimate grounds or to the extent we process them for marketing or profiling purposes.

Similarly, any other individual whose Personal Data are collected (directly or indirectly) and processed by Deloitte Luxembourg as controller has the same rights as above described.

Please note that where the provision of Personal Data by the User is a statutory or contractual obligation, failing to provide such Personal Data might render it impossible for Deloitte Luxembourg to provide you with the contemplated services or access to Platform and thus may lead to the termination of your access to our Platform and its content. This would be the case if we do not receive adequate or accurate Personal Data for the purpose of your registration to the Platform.

To exercise any of the rights mentioned above, or if you have any questions about our use of your Personal Data, please contact our Data Protection Officer (DPO) at DataPrivacy@deloitte.lu

You may also use these contact details if you wish to make a complaint to us relating to this Privacy Statement.

Should you have any problem accessing our Platform or wish to liaise with us in respect of the exercise of the above rights, you may also contact webmaster services using ludboardsupport@deloitte.lu or our Data Protection Officer (DPO) at DataPrivacy@deloitte.lu.

8. Information security

We use a range of physical, electronic and managerial measures to ensure that we keep your Personal Data secure, accurate and up to date. These measures 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 Ddata on a 'need to know' basis
- technological security measures, including fire walls, encryption and anti-virus software
- physical security measures, such as staff security passes to access our premises.

Although we use appropriate security measures once we have received your Personal Data, the transmission of data over the internet (including by e-mail) is never completely secure. We endeavor to protect Personal Data, but we cannot guarantee the security of data transmitted to us or by us.

9. How long do we keep Personal Information for?

We will hold Personal Data on the Platform for the longest of the following periods: (i) as long as is necessary for your use of the Platform and the maintenance of information provided therein by you; (ii) any retention period that is required by law; (iii) the end of the period in which litigation or investigations might arise in respect of the services.

10. Right to complain

If you are unhappy with the way we have handled your Personal Data or any privacy query or request that you have raised with us, you have the right to complain to the EU Data Protection Authority ("DPA") in your jurisdiction (if in the European Union). For Luxembourg you may contact the National Commission for Data Protection (CNPD).

11. Changes to our Privacy Statement

We may modify or amend this Privacy Statement from time to time at our discretion. When we make changes to this Statement, we will amend the revision date at the top of this page and the amended version will be presented to you during your next visit to the Platform.