

# EY/Ethics - Privacy Notice

## Introduction

EY/Ethics is a confidential online reporting system operated on behalf of EY<sup>1</sup> by NAVEX Global, Inc. and provided by EY to allow people to ask questions or to report suspected violations of law, professional standards, or the EY Global Code of Conduct.

EY personnel are encouraged to report possible violations directly to your counselor, Risk Management Leader, Legal, Talent representative, Professional Practice Director or client service partner, as appropriate. EY/Ethics should only be used in circumstances where you do not feel comfortable using these channels of communication or where you believe doing so would be unproductive or inappropriate.

This Notice describes the practices which EY follows in relation to EY/Ethics. Please read and accept the terms contained in this notice. If you do not acknowledge the terms below, we are unable to accept any information through EY/Ethics. If you are an EY employee, you may instead report your concern directly through the channels identified above.

In certain countries, EY may only accept reports through EY/Ethics that relate to certain matters (such as anti-money laundering). If your concern pertains to a matter that, under local law, may not be accepted through EY/Ethics, please raise your concerns directly through the channels noted above.

The information you provide about yourself, EY professionals and/or other parties may result in decisions that affect others. Therefore, we ask that you only provide information that, to the best of your knowledge, is correct and factual. EY does not permit discrimination or retaliation of any kind for good faith reports of illegal or unethical behavior. However, please be aware that knowingly providing false or misleading information is a breach of our Global Code of Conduct and will not be tolerated.

## Collection of information

The information you provide will be treated confidentially to the extent permitted by law. We encourage you to identify yourself to facilitate any necessary follow up.

EY/Ethics captures the following information if provided by you: your name and contact details, any questions you may have, the country to which the reported concern relates, the name and title of all individuals you may be reporting and a description of the suspected legal or compliance violation (including attachments that support your report).

The information you provide will be stored on EY's behalf on servers hosted by NAVEX Global, Inc. in the United States. For data collected in the European Economic Area (EEA) or which relates to individuals in the EEA, EY requires an appropriate transfer mechanism as necessary to comply with applicable law. The transfer of personal data to EY/Ethics is governed by an agreement between EY and NAVEX Global, Inc. that includes standard data protection clauses adopted by the European Commission.

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<sup>1</sup> "EY" refers to one or more of the member firms of Ernst & Young Global Limited ("EYG"), each of which is a separate legal entity, and each of which can act as a data controller in its own right.

## Who has access to your information?

Unless you have indicated otherwise or unless required by law, the reports filed through EY/Ethics will be routed to a designated EY/Ethics team. These individuals vary around the world, but typically include members of EY's Legal, Risk Management or Talent teams, external EY advisors retained to assist in investigating a report, or technical staff at Navex Global. EY Leadership may, on occasion, have access to the reports.

If you are submitting a report concerning activity in a member firm within the European Union, you may choose to restrict access to your report to a designated department of that member firm only. Where this option is selected, the EY/Ethics Team will not have access to the details of your report. Further information about this process and contact information for the designated departments in the EU member state firms is available under the Resources tab on the Hotline landing page.

Regardless of your selection, the information you provide will only be used and reviewed by those individuals as required to fulfil their professional duties and your confidentiality will be respected.

## What happens next?

Once you have completed your report, you will be provided with a Report Key and you will be asked to create a password. You will need both in order to access the matter which you have reported either by returning to the EY/Ethics site or by contacting the Call Center.

The EY/Ethics Team (or designated department) will evaluate the information you provide and may conduct an investigation. Your cooperation and assistance in that investigation may be necessary. If an investigation indicates that a violation of the EY Code of Conduct or applicable laws or regulations has occurred, EY will take such action as it considers appropriate in the circumstances. Depending on the nature of the matter, it may not be possible for EY to share the result of its investigation with you.

Please note that, in some circumstances, individuals you identify through EY/Ethics may be informed about the fact that a report has been made. To the extent reasonably possible, EY will not identify you. All individuals you identify will have the right to respond to or correct information you report.

## Your Personal Data

The access rights detailed above may involve the transfer of personal data in various jurisdictions (including jurisdictions outside the European Union) in which EY operates. EY will process your personal data in accordance with applicable law and professional regulations in your jurisdiction. Transfers of personal data within the EY network are governed by EY's Binding Corporate Rules ([www.ey.com/bcr](http://www.ey.com/bcr)).

EY is committed to making sure that your personal data is kept secure. In order to prevent unauthorized access or disclosure, EY has put in place appropriate technical and organizational measures to safeguard and secure your personal data. EY also requires Navex Global to adequately secure your personal and not use it for any unauthorized purposes.

Sensitive personal data is data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health or data concerning sex life, sexual orientation or sexual identity as well as personal data relating to criminal convictions and offences.

EY does not intentionally collect any sensitive personal data from you via EY/Ethics and it is not the intention of EY/Ethics to process such information. We strongly encourage you not to include any sensitive personal data in your report unless necessary to support your report.

### **Controlling your personal data**

EY will not sell, distribute or lease your personal data to third parties unless we have your permission or are required by law to do so.

EY provides you with the ability to make sure your personal data is accurate and up to date. If at any time you would like EY to rectify, erase or restrict the processing of your personal data, or if you would like to obtain confirmation whether or not your personal data is processed by EY, access your personal data, exercise your right to data portability or withdraw your consent to processing, please send an e-mail to [global.data.protection@ey.com](mailto:global.data.protection@ey.com). We will use reasonable efforts to contact you regarding your request.

### **Complaints about Data Privacy**

If you are concerned about an alleged breach of privacy law by EY, you can contact EY's Global Privacy Officer, 6 More London Place, London, SE1 2DA, United Kingdom or via email at [global.data.protection@ey.com](mailto:global.data.protection@ey.com). An EY Privacy Officer will investigate your complaint and give you information about how it will be handled.

If you are not satisfied with the way in which EY has resolved a privacy complaint, you have the right to complain to the data protection authority in your country. You may also refer the matter to a court of competent jurisdiction.

Certain EY member firms in countries outside the European Union (EU) have appointed a representative in the EU to act on their behalf if, and when, they undertake data processing activities to which the EU General Data Protection Regulation (GDPR) applies. Further information and the contact details of these representatives are available [here](#).

### **Contact us**

If you have questions about the EY/Ethics hotline, you may submit a question to the EY/Ethics site. If you have privacy concerns which have not been addressed by this Privacy Notice, please contact [global.data.protection@ey.com](mailto:global.data.protection@ey.com)