



## DBoard Privacy Statement

Last revised: 14 December 2023

### 1. General

This Privacy Statement applies to the platform DBoard (“DBoard” or the “Platform”).

DBoard is a platform maintained and operated by Deloitte Tax & Consulting, *société à responsabilité limitée* (an affiliate of the Luxembourg member firm of DTTL as defined below - “Deloitte Luxembourg”, “us”, “our” or “we”). The Platform is accessible through the Internet and comprise several applications and features, created and owned either by a Deloitte Luxembourg Entity or by an external service provider (each an “Application”).

In order to provide to you, as an individual user (“User”, “you”, or “your”), with access to and use of the Platform, we collect and process information directly or indirectly related to you (“Personal Data”).

This Privacy Statement explains what Personal Data we may gather about you when you are using the Platform, how we use that Personal Data and to whom we share these Personal Data with, **when we are acting as a data controller for these data**. It also sets out your rights in relation to Personal Data and whom you can contact for more information or queries.

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

### 2. Other Privacy Statements

Because the Platform consists of several Applications, you may also need to share your Personal Data with external service providers and be subject to supplemental privacy statements that will apply to your use of a specific Application (“**Specific Privacy Statement**”). Those Specific Privacy Statement may be displayed in the specific Application to which it relates, or can be obtained directly from the external service provider owning this Application.

The Platform may also 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.

If you wish to obtain more information about how Deloitte Luxembourg and other members of the Deloitte Network<sup>1</sup> in Luxembourg process Personal Data, please refer to our [General Privacy Statement locates in Deloitte.com/lu](https://www.deloitte.com/lu/privacy).

### 3. User-generated content and personal information

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, as User of the Platform, you upload 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. It is up to you to make sure that you have collected such data lawfully and in a transparent manner and you have all authorizations needed for you to be able to share them with Deloitte Luxembourg.

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<sup>1</sup> 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.

#### 4. What type of Personal Data we collect and use

When you use DBoard, we may collect the following Personal Data:

- **Your contact details** such as your first and last name; 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;
- **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.

We may also have access to Personal Data that you upload on the Platform. 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 pertain to their owner (you, your organization or other third parties) and Deloitte Luxembourg has no control over them. When processing this Personal Data, Deloitte will be considered a Data Processor and, therefore, we recommend you to contact your organization for any further information on the Personal Data processing.

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.

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

We use your personal data for the following purposes:

- **Creation of your profile, authentication and granting access to the Platform**

We process this information given our legitimate interest to deliver and provide you access to the DBoard Platform, which supports the provision of appropriate client's services. We may use third party providers, including cloud hosting providers, to assist us with managing authentication and authorisation.

Please note that, if we do not receive adequate or accurate Personal Data for the purpose of your registration to the Platform, this might render it impossible for Deloitte Luxembourg to provide you with access to Platform and thus may lead to the termination of your access to our Platform and its content.

- **Platform administration and support, problem-solving and maintenance of profiles and use of the Platform**

We process this information given our legitimate interest to ensure the correct functioning and security of the DBoard Platform.

- **Feedback and Platform's Improvement**

From time to time, we might contact you to get your feedback on the use of the Platform and your satisfaction as regards its features and capabilities, you are not obliged to provide your feedback to us. 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.

We process this information given our legitimate interest in developing and improving our Platform and its features.

- **Security**

For security reasons, we may store and process 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. This also allows us to fight against any security threat.

We process this information given our legitimate interest in ensuring the security of the Platform.

- **Compliance with legal obligations and protection/enforcement of rights**

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

- **Help clients measure use of the Platform**

We may use your Personal Data for the purposes of, or in connection with our client's interest to measure adoption and use of the Platform.

When we process the information for our own purposes, it will be given our legitimate interest in improving the Platform and its functionalities.

When this activity is performed for our client's purposes, Deloitte will be considered a Data Processor, and the Data Controller – your organization - will determine the appropriate legal basis.

## **6. Disclosure of your Personal Data to third parties**

If you are an authorized User of one of our clients, we may provide your Personal Data (your name and information on your last access to DBoard) to our client with which you have a relationship upon its request.

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 and with the management of authentication and authorization of Users in 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").

## **7. 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; and (iv) under our client's request.

## **8. Log information and cookies**

A cookie is a small text file placed on your device when visiting certain websites or applications. Cookies help Users navigate websites efficiently and/or perform certain functions.

Cookies may be either session cookies, meaning that they will expire at the end of your web session, when the web browser is closed or persistent cookies, meaning that they will be stored by a web browser and will remain valid until their expiration date, unless deleted by you.

In addition, cookies may be either first party cookies set directly by us to your device, or third-party cookies set by a third-party provider on our behalf.

With respect to the Platform, we only use session cookies, which do not include Personal Data. These cookies are strictly necessary cookies, meaning that they are necessary for the Platform to function and cannot be switched off in our systems. We are using them for authentication purpose and to permit the navigation from the mobile mode. 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.

Browsers give you a level of control over cookies. You can set your browser to accept or reject all, or certain, cookies (detailed information are available at <http://www.aboutcookies.org/>). If you use your browser settings to block all cookies, which would include blocking our “*strictly necessary cookies*”, you may not be able to access all or parts of our Platform.

## 9. Your rights in respect of your Personal Data

As a natural person, you can exercise the following rights, at any time, about how we process your Personal Data:

- 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.

To exercise any of the rights mentioned above, if you have any questions about our use of your Personal Data, or if you wish to make a complaint related to this Privacy Statement please contact our Privacy Team at [DataPrivacy@deloitte.lu](mailto:DataPrivacy@deloitte.lu).

When Deloitte acts as a Data Processor, we will (i) communicate to you the Data Controller to be contacted; or (ii) submit your request to the appropriate Data Controller so that it can fulfill your request.

## 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. 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 Data 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.

## **12. 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.

## **13. Contact details**

For questions or complaints about this Privacy Statement and how Deloitte Luxembourg handles your Personal Data, you can find us in the address 20, Boulevard de Kockelscheuer, L-1821 Luxembourg, Luxembourg or you can contact our Data Protection Officer by emailing us at [DataPrivacy@deloitte.lu](mailto:DataPrivacy@deloitte.lu).