

Last updated: 9 June 2020

Privacy Notice - Enterprise Resilience Tool (ERT)

1. Introduction

This Privacy Notice is intended to describe the practices EY follows in relation to the Enterprise Resilience Tool ("Tool") with respect to the privacy of all individuals whose personal data is processed and stored in the Tool. This Privacy Notice should be read together with the [ey.com Privacy Statement](#), and in case of any conflict with the [ey.com Privacy Statement](#), the terms of this Privacy Notice will prevail. Please read this Privacy Notice carefully.

2. Who manages the Tool?

"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 can determine the purposes and means for data processing in its own right (i.e. act as a data controller or in a similar capacity). The entity that is acting as data controller (or similar capacity) by providing this Tool on which your personal data will be processed and stored is EYGM Limited, an EY global entity.

The personal data in the Tool is shared by EYGM Limited with one or more member firms of EYG (see "Who can access your personal data" section 6 below).

The Tool is hosted on EY managed Microsoft Azure servers in France.

3. Why do we need your personal data?

The Tool is a web application which enables EY teams to gather information from clients, relating to each client's resilience level to the COVID-19 pandemic and other global emergencies/major disruptive events, and aggregates that information into an online reporting dashboard for purposes of viewing current and future resilience, trending resilience against previous waves, and benchmarking against the database.

Your personal data processed in the Tool is used as follows:

- EY Partners, employees and contractors who have user roles within the Tool will have their login credentials processed.
- Clients will log into the Tool with a username and password.

EY relies on the following basis to legitimize the processing of your personal data in the Tool: Processing of your personal data is necessary for the purposes of the legitimate interests pursued by the data controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data. The specific legitimate interest is enabling EY to undertake a global assessment which will ultimately assist EY client entities to manage their COVID-19 or other crisis preparedness so they can focus on where they may need to increase their organizations resilience and adapt their operations in light of this type of global crisis.

You have the right to object at any time, on grounds relating to your particular situation, to the processing of personal data concerning you based on the above legitimate interest(s).

4. What type of personal data is processed in the Tool?

The Tool processes these personal data categories:

- EY Partners, employees and contractors login credentials consist of names, email addresses and passwords.
- Clients users will log into the Tool with a username and password. The Tool will also process names, emails, passwords, rank, role and function within the client. IP address will be captured in logs of Tool in line with EY's policies on Information Security.

This data is sourced from:

- directly from EY Partners, employees or contractors when they access the Tool; it will then be sourced via a feed of other EY systems such as GHRDB when Active Directory single sign on launches; and
- provided directly by clients.

5. Sensitive personal data

Sensitive personal data reveals your 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 or sexual orientation.

EY does not intentionally collect any sensitive personal data from you via the Tool. The Tool's intention is not to process such information.

6. Who can access your personal data?

Your personal data is accessed in the Tool by the following persons/teams:

Name	Location	Potential number of users	Purpose	Level of access
EY Admin	Global	10	Management of the users and the Tool	Read/Write/Delete
Client Technology	Global	10	Data migration and import/export Support L1, etc. Maintenance Database admin	Read/Write/Delete
EY Account Teams/ "Client Admins"	Global	5,000 (but only your Account Team will access your	Providing results back to a specific client and to enable	Read (for their client only and these are aggregated results)

		personal data)	interaction with client throughout the process	
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The access rights detailed above involves transferring personal data in various jurisdictions (including jurisdictions outside the European Union) in which EY operates (EY office locations are listed at www.ey.com/ourlocations). An overview of EY network entities providing services to external clients is accessible [here](#) (See Section 1 (About EY) - "View a list of EY member firms and affiliates"). EY will process your personal data in the Tool 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](#).

We transfer or disclose the personal data we collect to third-party service providers (and their subsidiaries and affiliates) who are engaged by us to support our internal ancillary processes. For example, we engage service providers to provide, run and support our IT infrastructure (such as identity management, hosting, data analysis, back-up, security and cloud storage services) and for the storage and secure disposal of our hard copy files. It is our policy to only use third-party service providers that are bound to maintain appropriate levels of data protection, security and confidentiality, and that comply with any applicable legal requirements for transferring personal data outside the jurisdiction in which it was originally collected.

To the extent that personal data has been rendered anonymous in such a way that you or your device are no longer reasonably identifiable, such information will be treated as non-personal data and the terms of this Privacy Notice will not apply.

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 from the Tool to the Microsoft Azure data centre is governed by an agreement between EY and the service provider that includes standard data protection clauses adopted by the European Commission.

7. Data retention

Our policy is to retain personal data only for as long as it is needed for the purposes described in the section "Why do we need your personal data". Retention periods vary in different jurisdictions and are set in accordance with local regulatory and professional retention requirements.

In order to meet our professional and legal requirements, to establish, exercise or defend our legal rights and for archiving and historical purposes, we need to retain information for significant periods of time.

The policies and/or procedures for the retention of personal data in the Tool are:

- Data is retained only in line with EY business need.
- Survey data will be retained for 7 years, unless deletion is explicitly requested by the client.

After the end of the data retention period, your personal data will be deleted.

8. Security

EY protects the confidentiality and security of information it obtains in the course of its business. Access to such information is limited, and policies and procedures are in place that are designed to safeguard the information from loss, misuse and improper disclosure. Additional information regarding our approach to data protection and information security is available in our [Protecting your data](#) brochure.

9. Controlling your personal data

EY will not transfer your personal data to third parties (other than any external parties referred to in section 6 above) unless we have your permission or are required by law to do so.

You are legally entitled to request details of EY's personal data about you.

To confirm whether your personal data is processed in the Tool or to access your personal data in the Tool or (where applicable) to withdraw your consent, contact your usual EY representative or email your request to global.data.protection@ey.com.

10. Object, rectification, erasure, restriction of processing or data portability

You can confirm your personal data is accurate and current. You can object to the processing of your personal data or request rectification, erasure, restriction of processing or a readily portable copy of your personal data by contacting your usual EY representative or by sending an e-mail to global.data.protection@ey.com.

11. Complaints

If you are concerned about an alleged breach of privacy law or any other regulation, contact EY's Global Privacy Leader, Office of the General Counsel, 6 More London Place, London, SE1 2DA, United Kingdom or via email at global.data.protection@ey.com or via your usual EY representative. An EY Privacy Leader will investigate your complaint and provide information about how it will be handled and resolved.

If you are not satisfied with how EY resolved your complaint, you have the right to complain to your country's data protection authority. You can 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](#).

12. Contact us

If you have additional questions or concerns, contact your usual EY representative or email global.data.protection@ey.com.