# **ALM Octane**

# **Privacy Statement**

Last revised: 6<sup>th</sup> July 2021

#### Introduction

Welcome to ALM Octane (this "**Website**"). This Privacy Statement applies to the entity within the Deloitte Network that invited you to use this Website, and it describes the ways in which your personal information is collected in connection with your use of this Website, the purposes for which your personal information is used, and how it is shared.

Please note that this Privacy Statement covers the personal information that is collected in connection with your use of this Website only. Any information uploaded to or posted on this Website will be used in accordance with the terms of the relevant engagement letter or this Website's Terms of Use, as applicable and may also be read or used by other authorized users who have been granted access to the ALM Octane collaboration spaces to which you have access .

This Website may contain links to other sites, including, without limitation, sites maintained by entities within the Deloitte Network, which may not be governed by this Privacy Statement. Users of this Website are encouraged to review each website's privacy statement before disclosing any personal information.

The "**Deloitte Network**" means Deloitte Touche Tohmatsu Limited ("**DTTL**"), the member firms of DTTL, and their related entities. To learn more about Deloitte's global network of member firms, please visit <a href="https://www.deloitte.com/about">www.deloitte.com/about</a>.

## **Information Collection and Use**

In order to register and gain access to the Website, users may be asked to provide their full name, email address, phone number and location. This information is used to verify your identity each time you log in to the Website. You may also be requested to submit additional information such as the name of your company and your professional position. This information will be used to manage your account and customize and improve the Website.

Use of this application may be subject to review, monitoring and recording at any time to enable help us ensure compliance with the <u>Terms of Use</u> and that only authorized parties are accessing ALM Octane using your user login and password.

### **Legal Basis for Information Processing**

Your personal information will be used for the purposes outlined above because: (a) one or more entities within the Deloitte Network have a legitimate interest in the effective delivery of services to you or a client of an entity/entities within the Deloitte Network; (b) the information is required in order to provide services to you or a client of an entity/entities within the Deloitte Network; or (c) one or more entities within the Deloitte Network are subject to legal or regulatory obligations, such as providing information to a public body or law enforcement agency.

# **Log Information, Cookies, and Web Beacons**

This Website collects standard internet log information, including a user's IP address, browser type and language, access time, and referring website address.

This Website also uses cookies (small text files stored on a user's device) to identify users when they connect to the site. A user's browser must be enabled to allow cookies in order to access this Website. Upon successful login, cookies are created and placed on the user's machine. In addition to information related to authentication, information may be stored in the cookies in order to direct a user to the correct site location. To ensure that this Website is well managed and to facilitate improved navigation, cookies or web beacons (electronic images that allow a website to count visitors who have accessed a particular page and access certain cookies) may be used to collect aggregate data.

Most browsers can be set to inform you when a cookie has been sent to you and provide you with the opportunity to reject that cookie. However, in some cases, refusing a cookie may preclude you from using or negatively impact the display or function of this Website or certain areas or features of this Website.

By using this Website, you agree that cookies can be placed on your computer or device as explained above. Please submit a request to <u>Delivery Excellence support</u> if you would like more detailed information on the cookies used by this Website.

### **Disclosure of Information to Third Parties**

In connection with one or more of the purposes outlined in the "Information Collection and Use" section above, your personal information may be disclosed to:

- other entities within the Deloitte Network;
- third parties that provide services to one or more entities within the Deloitte Network, such as website and system hosting, management, and support;
- other entities within the Deloitte Network and other third parties as part of a corporate transaction, such as a divesture, reorganization, merger, or acquisition; and
- competent authorities, including courts and authorities regulating one or more entities within the Deloitte Network, in each case to comply with legal or regulatory obligations or requests.

Please note that this Website is hosted in the United States. Additionally, some of the recipients of your personal information referenced above may be based in countries or regions outside of your home jurisdiction. Accordingly, any personal information that is collected in connection with your use of this Website may be transferred to countries or regions without data protection rules similar to those in effect in your home jurisdiction.

In such cases, adequate safeguards designed to protection your personal information will be put in place. Where the recipient is located outside of the European Economic Area ("**EEA**"), the adequate safeguard might be a data transfer agreement with the recipient based on standard contractual clauses approved by the European Commission for transfers of personal information to third countries.

For further details on the transfers described above and the adequate safeguards used with respect to such transfers, please submit a request to <u>Delivery Excellence support</u>.

# **Information Security**

Reasonable commercial standards of technology and operational security are in place and designed to protect your personal information from loss, misuse, and unauthorized access, disclosure, alteration, and destruction.

### **Information Retention**

Your personal information will be retained as long as is necessary for the fulfillment of the purposes identified in the "Information Collection and Use" section above or as otherwise necessary to comply with applicable laws or professional standards. Where personal information is no longer necessary or relevant for our identified purposes, your personal information will be disposed of securely.

# **Your Rights**

You have various rights in relation to your personal information. In particular, you have a right to:

- obtain confirmation that your personal information is being processed, and request a copy of your personal information; and
- ask that the personal information held about you be corrected or supplemented if such information is inaccurate or incomplete.

Depending on the jurisdiction in which you are located, you may also have the right to:

- ask that the personal information held about you be deleted, or restrict the way in which such information is used; and
- object to the processing of your personal information.

If you are interested in exercising any of the abovementioned rights or would like to raise a question about the processing of your personal information, please submit a request to <u>Delivery Excellence support</u>.

You may also use the above listed contact details if you wish to make a complaint relating to your personal information or privacy.

If you are located in the EEA and are unsatisfied with the way in which your personal information has been processed or the manner in which a privacy query or request that you have raised has been handled, you may have a right to complain to the relevant Data Protection Authority ("**DPA**"). For additional information or to be directed to the appropriate DPA, please submit a request to <u>Delivery Excellence support</u>.

## **Changes to this Privacy Statement**

This Privacy Statement may be modified or amended from time to time. When changes are made to this Privacy Statement, the revision date at the top of this page will be amended, and such modified or amended privacy statement shall be effective as to you and your information as of that revision date. As a user of this Website, you are encouraged to review this Privacy Statement periodically to be informed about how your personal information is protected.

#### Questions

If you have any questions regarding this Privacy Statement or your personal information or would like additional information, please submit a request to <a href="Delivery">Delivery</a> <a href="Excellence support">Excellence support</a>.