

Privacy Policy

Last updated 10 May 2018

KPMG LLP is dedicated to protecting the confidentiality and privacy of information entrusted to us. We comply with the EU General Data Protection Regulation (GDPR) and the UK Data Protection Act 2018. Please read this Privacy Policy to learn about your rights, what information we collect, how we use and protect it.

This website is operated by KPMG LLP ("KPMG LLP", "we" or "us"), a UK limited liability partnership, a member firm of the KPMG network of independent member firms affiliated with KPMG International Cooperative ("KPMG International"), a Swiss entity. KPMG International does not provide client services.

1. Who are we?

This Privacy Policy applies to KPMG LLP and our subsidiaries consisting of: Makinson Cowell Limited; KPMG Boxwood Limited; KPMG Crimsonwing Limited; KPMG Nunwood Consulting Limited; KPMG Audit Plc; KPMG Business Intelligence Ltd; KPMG CIO Advisory Ltd; KPMG IT Advisory Limited; KPMG Overseas Services Limited; KPMG Sourcing Limited; KPMG UK Limited; and KPMG United Kingdom Plc.

2. Who can you contact for privacy questions or concerns?

If you have questions or comments about this Privacy Policy or how we handle personal data, please direct your correspondence to: KPMG LLP, Data Protection and Privacy Office, 15 Canada Square, London UK E14 5GL or email dataprivacy@kpmg.co.uk. We aim to respond within 30 days from the date we receive privacy-related communications.

You may contact the UK Information Commissioner's Office at <https://ico.org.uk/concerns/handling/> to report concerns you may have about our data handling practices.

3. How do we collect personal data?

- **Directly.** We obtain personal data directly from individuals in a variety of ways, including obtaining personal data from individuals who provide us their business card, complete our online forms, subscribe to our newsletters and preference centre, register for webinars, attend meetings or events we host, visit our offices or apply for open roles. We may also obtain personal data directly when, for example, we are establishing a business relationship, performing professional services through a contract, or through our hosted software applications.
- **Indirectly.** We obtain personal data indirectly about individuals from a variety of sources, including recruitment services and our clients. We may attach personal data to our customer relationship management records to better understand and serve our business clients, subscribers and individuals, satisfy a legal obligation, or pursue our legitimate interests.
 - *Public sources* -- Personal data may be obtained from public registers (such as Companies House), news articles, sanctions lists, and Internet searches.
 - *Social and professional networking sites* -- If you register or login to our websites using social media (e.g., LinkedIn, Google, or Twitter) to authenticate your identity and connect your social media login information with us, we will collect information or content needed for the registration or login that you permitted your social media provider to share with us. That information may include your name and email address and depending on your privacy settings, additional details about you, so please review the privacy controls on the applicable service to set how much information you want shared with us.
 - *Business clients* -- Our business clients may engage us to perform professional services which involves sharing personal data they control as part of that engagement. For example, we will review payroll data as part of an audit and we often need to use personal data to provide global mobility and pension services. Our services may also include processing personal data under our clients' control on our hosted software applications, which may be governed by different privacy terms and policies.

- *Recruitment services.* We may obtain personal data about candidates from an employment agency, and other parties including former employers, and credit reference agencies.

4. What categories of personal data do we collect?

We may obtain the following categories of personal data about individuals through direct interactions with us, or from information provided through client engagements, from applicants, our suppliers and through other situations including those described in this Privacy Policy.

- Personal data. Here is a list of personal data we commonly collect to conduct our business activities.
 - Contact details (e.g., name, company name, job title, work and mobile telephone numbers, work and personal email and postal address).
 - Professional details (e.g., job and career history, educational background and professional memberships, published articles).
 - Family and beneficiary details for insurance and pension planning services (e.g., names and dates of birth).
 - Financial information (e.g., taxes, payroll, investment interests, pensions, assets, bank details, insolvency records).
 - CCTV at our sites may collect images of visitors. Our policy is to automatically overwrite CCTV footage within 30 days.
- Sensitive personal data. We typically do not collect sensitive or special categories of personal data about individuals. When we do need to process sensitive personal data, it is with the consent of the individual unless it is obtained indirectly for legitimate purposes. Examples of sensitive personal data we may obtain include:
 - Dietary restrictions or access requirements when registering for in-person events that reveal religious beliefs or physical health.
 - Personal identification documents that may reveal race or ethnic origin, and possibly biometric data of private individuals, beneficial owners of corporate entities, or applicants.
 - Expense receipts submitted for individual tax or accounting advice that reveal affiliations with trade unions or political opinions.
 - Adverse information about potential or existing clients and applicants that may reveal criminal convictions or offences information.
 - Information provided to us by our clients in the course of a professional engagement.
 - Diversity and equal opportunity information volunteered by participants in certain KPMG professional empowerment programmes (e.g., Connect On Board).
- Child data. Although we do not intentionally collect information from individuals under 13 years of age, we may occasionally receive details about children attending performances and other events we host with their parents or guardians (e.g., arena hospitality suites, galas, art exhibits).
- Location-based data. We may process geographical locations you enter when seeking an office near you.

5. What lawful reasons do we have for processing personal data?

We may rely on the following lawful reasons when we collect and use personal data to operate our business and provide our products and services:

- Contract – We may process personal data in order to perform our contractual obligations.
- Consent - We may rely on your freely given consent at the time you provided your personal data to us.
- Legitimate interests – We may rely on legitimate interests based on our evaluation that the processing is fair, reasonable and balanced. These include:

- *Delivering services to our clients* – To deliver the professional services our clients have engaged us to provide.
 - *Direct marketing* – To deliver timely market insights and speciality knowledge we believe is welcomed by our business clients, subscribers and individuals who have interacted with us.
- Legal obligations and public interests – We may process personal data in order to meet regulatory and public interest obligations or mandates.

6. Why do we need personal data?

We aspire to be transparent when we collect and use personal data and tell you why we need it, which typically includes:

- Providing professional advice and delivering reports related to our tax, advisory, audit and assurance, pension scheme administration, restructuring, mergers and acquisitions and other professional services. Our services may include reviewing client files for quality assurance purposes, which may involve processing personal data for the relevant client.
- Promoting our professional services, products and capabilities to existing and prospective business clients.
- Sending invitations and providing access to guests attending our events and webinars or our sponsored events.
- Personalising online landing pages and communications we think would be of interest based on interactions with us and KPMG member firms.
- Administering, maintaining and ensuring the security of our information systems, applications and websites.
- Authenticating registered users to certain areas of our sites.
- Seeking qualified candidates, and forwarding candidate career inquiries to our People team, which may be governed by different privacy terms and policies.
- Processing online requests, including responding to communications from individuals or requests for proposals and quotations.
- Contacting journalists regarding company press releases, invitations to annual press parties, highlighting messages that may be of interest on specific industry topics.
- Travel arrangement assistance.
- Helping support clients to run a series of development programs for education and learning purposes to inform leaders in the healthcare, civil service and other industries.
- Complying with legal and regulatory obligations relating to countering money laundering, terrorist financing, fraud and other forms of financial crime.

7. Do we share personal data with third parties?

We may occasionally share personal data with trusted third parties to help us deliver efficient and quality services. These recipients are contractually bound to safeguard the data we entrust to them. We may engage with several or all of the following categories of recipients:

- KPMG member firms, where necessary for administrative purposes and to provide professional services to our clients (e.g., when providing services involving advice from KPMG member firms in different territories).
- Parties that support us as we provide our services (e.g., providers of telecommunication systems, mailroom support, IT system support, archiving services, document production services and cloud-based software services).
- Our professional advisers, including lawyers, auditors and insurers.

- A potential buyer, transferee, merger partner or seller and their advisers in connection with an actual or potential transfer or merger/acquisition of part or all of our business or assets, or any associated rights or interests.
- Payment services providers.
- Marketing services providers.
- Law enforcement or other government and regulatory agencies (e.g., HMRC) or to other third parties as required by, and in accordance with, applicable law or regulation.
- Recruitment services providers.

8. Do we transfer your personal data outside the European Economic Area?

We store personal data on servers located in the European Economic Area (EEA). We may transfer personal data to KPMG International, KPMG member firms, and reputable third party organisations situated inside or outside the EEA when we have a business reason to engage these organisations. Each organisation is required to safeguard personal data in accordance with our contractual obligations and data protection legislation.

9. Do we use cookies?

Our websites may use cookies. Where cookies are used, a statement will be sent to your browser explaining the use of cookies. To learn more, please refer to our [cookie policy](#).

10. What are your data protection rights?

Your data protection rights are highlighted here. To submit a data request please email dataprivacy@kpmg.co.uk.

- Access – You can ask us to verify whether we are processing personal data about you, and if so, to provide more specific information.
- Correction – You can ask us to correct our records if you believe they contain incorrect or incomplete information about you.
- Erase – You can ask us to erase (delete) your personal data after you withdraw your consent to processing or when we no longer need it for the purpose it was originally collected.
- Processing restrictions – You can ask us to temporarily restrict our processing of your personal data if you contest the accuracy of your personal data, prefer to restrict its use rather than having us erase it, or need us to preserve it for you to establish, exercise, or defend a legal claim. A temporary restriction may apply while verifying whether we have overriding legitimate grounds to process it. You can ask us to inform you before we lift that temporary processing restriction.
- Data portability – In some circumstances, where you have provided personal data to us, you can ask us to transmit that personal data (in a structured, commonly used, and machine-readable format) directly to another company if is technically feasible.
- Automated Individual Decision-making – You can ask us to review any decisions made about you which we made solely based on automated processing, including profiling, that produced legal effects concerning you or similarly significantly affected you.
- Right to Object to Direct Marketing including Profiling – You can object to our use of your personal data for direct marketing purposes, including profiling. We may need to keep some minimal information to comply with your request to cease marketing to you.
- Right to Withdraw Consent – You can withdraw your consent that you have previously given to one or more specified purposes to process your personal data. This will not affect the lawfulness of any processing carried out before you withdraw your consent. It may mean we are not able to provide certain products or services to you and we will advise you if this is the case.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information or to exercise any of your other rights. This helps us to ensure that personal data is not

disclosed to any person who has no right to receive it. No fee is required to make a request unless your request is clearly unfounded or excessive. Depending on the circumstances, we may be unable to comply with your request based on other lawful grounds.

11. What about personal data security?

We have put appropriate technical and organisational security policies and procedures in place to protect personal data (including sensitive personal data) from loss, misuse, alteration or destruction. We aim to ensure that access to your personal data is limited only to those who need to access it. Those individuals who have access to the data are required to maintain the confidentiality of such information. We may apply pseudonymisation, de-identification and anonymisation techniques in efforts to further protect personal data.

If you have access to parts of our websites or use our services, you remain responsible for keeping your user ID and password confidential. Please be aware that the transmission of data via the Internet is not completely secure. Whilst we do our best to try to protect the security of your personal data, we cannot ensure or guarantee the security of your data transmitted to our site; any transmission is at your own risk.

12. How long do we retain personal data?

We retain personal data to provide our services, stay in contact with you and to comply with applicable laws, regulations and professional obligations that we are subject to. Unless a different time frame applies as a result of business need or specific legal, regulatory or contractual requirements, where we retain personal data in accordance with these uses, we retain personal data for seven years. We will dispose of personal data in a secure manner when we no longer need it.

13. Do we link to other websites?

Our websites may contain links to other sites, including sites maintained by other KPMG member firms that are not governed by this Privacy Policy. Please review the destination websites' privacy policies before submitting personal data on those sites. Whilst we try to link only to sites that share our high standards and respect for privacy, we are not responsible for the content, security, or privacy practices employed by other sites.

14. Do we change this privacy policy?

We regularly review this Privacy Policy and will post any updates to it on this webpage. This Privacy Policy was last updated 10 May 2018.