



# Privacy Notice

## Introduction

We are committed to protecting your privacy.

This Privacy Notice explains how we will collect, handle, store and protect information about you collected from (1) the Web pages of any website with respect to which this Privacy Notice is posted or linked (collectively referred to as the “**Website**”), or (2) any other mode of interacting with you relating to Deloitte communications, such as email, phone call, post or facsimile, that reference this Privacy Notice (“**Communication**”). By using the Website, or continuing to receive Communications, you agree to the use of such information in accordance with this Privacy Notice.

As used in this Privacy Notice, “**Deloitte**” means a Deloitte entity that is a member of Deloitte Asia Pacific Limited and of the Deloitte Network. “**Deloitte Network**” refers to one or more of Deloitte Touche Tohmatsu Limited, a UK private company limited by guarantee (“**DTTL**”), its global network of member firms and their related entities. DTTL and each of its member firms and related entities are legally separate and independent entities, which cannot obligate or bind each other in respect of third parties. DTTL and each DTTL member firm and related entity is liable only for its own acts and omissions, and not those of each other. DTTL does not provide services to clients. Please see [www.deloitte.com/about](http://www.deloitte.com/about) to learn more.

Deloitte Asia Pacific Limited is a company limited by guarantee and a member firm of DTTL. Members of Deloitte Asia Pacific Limited and their related entities, each of which is a separate and independent legal entity, provide services from more than 100 cities across the region, including Auckland, Bangkok, Beijing, Bengaluru, Hanoi, Hong Kong, Jakarta, Kuala Lumpur, Manila, Melbourne, Mumbai, New Delhi, Osaka, Seoul, Shanghai, Singapore, Sydney, Taipei and Tokyo. When used in this Privacy Notice, “**we**”, “**us**” and “**our**” refers to Deloitte in Southeast Asia.

This Privacy Notice contains information about when we share your Personal Information with other members of the Deloitte Network and/or other third parties, where applicable.

In this Privacy Notice, information about you, which may be referred to as personal data in some jurisdictions, is referred to as “**Personal Information**”. We may also sometimes collectively refer to handling, collecting, protecting and storing your Personal Information as “**processing**” such Personal Information.

## Information collection

Personal Information refers to information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual, or household.

We may collect Personal Information when you interact with the Website or because you give it to us (for example, when you enter information directly into the Website through a form on our Website, over the phone when you call the hotline, when you provide it to us in an email, facsimile or postal mail), or when we observe or infer it from the information that you provide to us.

When you submit any information by using this Website, we may collect information relating to:

- You, as the person submitting the information;
- Employees involved in the incident that you are reporting, such as an alleged wrongdoer or witnesses to alleged misconduct;
- Third parties that are not employees, but who are connected with the incident you are reporting.

When you submit a report or log a disclosure using this Website, you may choose to remain anonymous. However, if you choose to identify yourself, we will collect the Personal Information you provide, which may include: your name; current job title; company name; e-mail address; country of residence; and any other information that you voluntarily provide to us.

We will also collect information about other employees and third parties reported to be connected with the incident, and their Personal Information which may include: employment and education details; family and social circumstances; gender; financial details; government documents such as Visa information or passport details; photograph, video or audio recording identifiable to

an individual; ; and any other information that you voluntarily provide to us. We may also collect or obtain Personal Information from you because of the way you interact with us or others.

Due to the sensitive nature of some of the reports submitted on this Website, we may also receive and need to process 'sensitive' or 'special categories' of Personal Information (e.g., data relating to race or ethnic origin, religious or philosophical beliefs, trade union membership, political opinions, medical or health conditions, or information specifying the sex life or sexual orientation of an individual). The types of 'special categories' of Personal Information that we collect may vary depending on how you use this Website. In some circumstances, we might gather special categories of Personal Information about you because you volunteer that data to us, or we are required to gather that data as a result of legal requirements imposed on us. We will, where necessary, obtain your explicit consent to collect and use such information.

We understand the importance of protecting children's privacy. Our Website is not designed for, or intentionally targeted at, children. It is not our policy to intentionally collect or store information about children.

### **Log information, cookies and web beacons**

When you access the Website, we may collect standard Internet log information including your IP address, browser type and language, access times and referring website addresses. To ensure that the Website and Communications are well managed and to facilitate improved navigation, we or our service provider(s) may also use cookies (small text files stored in a user's browser) or web beacons (electronic images that allow us to count users who have accessed particular content and to access certain cookies) to collect aggregate data. Additional information on how we may use cookies and other tracking technologies and how you can control these can be found in our Cookie Notice.

## **Information use**

### **Use of Personal Information collected via our Website**

We may use your Personal Information collected:

- to verify your identity;
- enable the incident that you are reporting to be investigated by our client organization; and
- if you agree, to contact you in relation to the incident you are reporting and respond to any request you submit through our Website.

### **Use of Personal Information for other activities that form part of the operation of our business**

In addition to the purposes connected to the operation of our Website above, we may use your Personal Information for the purposes of, or in connection with:

- applicable legal, regulatory or professional requirements;
- requests and communications from competent authorities; and
- protecting our rights and/or property.

Access to the Website may be subject to review, monitoring and recording at any time to help us confirm compliance with applicable Terms of Use and that only authorised parties are accessing the Website.

### **Legal basis for processing information**

This section sets out the legal grounds on which we rely in order to process your Personal Information.

When we process Personal Information for the purposes outlined above, we do so because of: (a) our legitimate interests in the effective delivery of our Website and related services offered by Deloitte to its clients (i.e. those entities that engage Deloitte to provide services); (b) our legitimate interests in the effective and lawful operation of our Website so long as such interests are not outweighed by your interests; (c) the legal and regulatory obligations that we are subject to, such as keeping records for tax purposes or providing information to a public body or law enforcement agency.

To the extent that we process any sensitive Personal Information relating to you for any of the purposes outlined above, we will do so because: (i) you have given us your explicit consent to process that data; (ii) the processing is necessary for the establishment, exercise or defense of legal claims; or (iii) you have made the data manifestly public.

Importantly, we do not participate in the investigation of any allegations raised in reports submitted through this Website. Instead, such processing activity is undertaken by the relevant client organization who has engaged Deloitte to provide services.

## Disclosure of information to third parties

In connection with one or more of the purposes outlined in the "Information use" section above, we may disclose Personal Information about you to: other members of the Deloitte Network for legitimate business-related purposes (such as to enable them to provide services to their clients); third parties that provide services to us and/or the Deloitte Network; as part of a corporate transaction (such as a sale, divestiture, reorganization, merger or acquisition); competent authorities (including courts and authorities regulating us or another member of the Deloitte Network) and other third parties that reasonably require access to Personal Information relating to you for one or more of the purposes outlined in the "Information use" section above. In relation to Communications, we may also share your Personal Information with service providers in connection with the delivery of such Communications.

We may also need to disclose your Personal Information if required to do so by law, by a regulator or during legal proceedings. Please note that some of the recipients of your Personal Information referenced above may be based in countries without data protection laws similar to those in effect in your area of residence. In such cases, we will ensure that there are adequate safeguards in place to protect your Personal Information that comply with our legal obligations. For example, 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.

Further details of the transfers described above, and the adequate safeguards used by us in respect of such transfers, are also available from us. For such information, please contact us by using the "Contact information" section below. Under applicable law, you may be entitled to request information concerning whether your Personal Information has been disclosed to nonaffiliated third parties for their direct marketing purposes. We do not share your personal information with nonaffiliated third parties for such purposes.

We may share non-personal, de-identified and aggregated information with third parties for several purposes, including data analytics, research, submissions, thought leadership and promotional purposes.

## Selling of information

We do not sell your personal information.

## Privacy practices of third parties

This Privacy Notice addresses only the use and disclosure of information we collect through your interaction with the Website. Other websites or applications that may be accessible through links from the Website have their own privacy notices and personal information collection, use and disclosure practices. We encourage you to familiarize yourself with the privacy notices provided by these other parties prior to providing them with information.

## Do not track

"Do Not Track" is a preference you can set in your web browser to let websites and applications you visit know that you do not want them collecting information about you. The Website does not currently respond to a "Do Not Track" or similar signal.

## Information security

We use a range of physical, electronic and managerial measures to keep your Personal Information secure, accurate and up to date. These measures include:

- education and training to relevant staff so they are aware of our privacy obligations when handling Personal Information;
- administrative and technical controls to restrict access to Personal Information on a 'need to know' basis;
- technological security measures, including fire walls, encryption and anti-virus software; and
- physical security measures, such as staff security passes to access our premises.

Although we use appropriate security measures once we have received your Personal Information, the transmission of data over the internet (including by e-mail) is never completely secure. We endeavor to protect Personal Information, but we cannot guarantee the security of data transmitted to us or by us over the internet.

## Information retention

We will hold your Personal Information on our systems for the longest of the following periods: (i) as long as is necessary for the relevant activity or services; (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.

## Your rights

Depending on the jurisdiction in which you are located, under applicable law, you may have various rights in relation to your Personal Information. In particular, you may have a right to:

- obtain confirmation that we are processing your Personal Information and request a copy of the Personal Information we hold about you;
- ask that we update the Personal Information we hold about you, or ask that we correct such Personal Information that you think is incorrect or incomplete;
- ask that we delete Personal Information that we hold about you, or restrict the way in which we use such Personal Information; and
- object to our processing of your Personal Information.

If you are unsatisfied with the way in which we have handled your Personal Information or any privacy query or request that you have raised to us, you have a right to complain to the data protection authority in your jurisdiction. For such information, please contact us by using the “Contact information” section below.

## Verification of Personal Information requests

For certain Personal Information requests, we must first verify your identity before processing your request. To do so, we may ask you to provide us with your full name, contact information, and relationship to Deloitte. Depending on your request, we may ask you to provide additional information. Once we receive this information, we will then review it and determine whether we are able to match it to the information Deloitte maintains about you to verify your identity.

## Contact information

To exercise your rights or if you have any questions concerning your privacy while using the Website, please contact [halosupport@deloitte.com](mailto:halosupport@deloitte.com).

## Changes to this Privacy Notice

### We may modify or amend this Privacy Notice from time to time.

To let you know when we make changes to this Privacy Notice, we will amend the revision date at the top of this page. The new modified or amended Privacy Notice will apply from that revision date. Therefore, we encourage you to periodically review this Privacy Notice to be informed about how we are protecting your information.

This Privacy Notice was written in English (U.S.). To the extent any translated version of this Privacy Notice conflicts with the English version, the English version controls.

Last updated: 22 April 2024