

## **Personal Information Collection Statement (“Statement”)**

**(for PwC China)**

**Last updated: [16 December 2019] (For Employment (as Defined) Use Only)**

This Statement explains what personal information we gather and create about you, what we use that information for, and who we give that information to. It also sets out your rights in relation to your information and who you can contact for more information or queries. In this Statement, your information is sometimes called “personal data” or “personal information”. Terms used in this Statement have the meanings as defined in Appendix 1.

Below is our index of this Statement, for more detailed information, please refer to the relevant sections of this Statement:

- **Data Controller(s)**
- **Categories of Personal Data**
- **Purposes of Collection and Process of Personal Data**
- **Classes of Transferees/Categories of Recipients**
- **Security of Personal Information**
- **Retention Period**
- **Your Rights to Personal Data and Contacting Us**
- **Children**
- **Changes to this Statement**
- **Appendices 1 and 2**

### **1. Data Controller(s)**

Generally, the PwC Member Firm to whom you applied for a role, or contracted with for Employment (as defined in Appendix 1), and/or with whom you have a contractual relationship (whether as a consultant, a secondee, a contractor or otherwise) is your Data Controller for the purpose of this Statement. For details of the relevant PwC Member Firm in locations in Mainland China, Hong Kong SAR or Macau SAR, please refer to

<https://www.pwc.com/gx/en/about/office-locations/china.html>

<https://www.pwc.com/gx/en/about/office-locations/hong-kong.html>

<https://www.pwc.com/gx/en/about/office-locations/macau.html>

The PwC Member Firm whom you contracted with may share your personal information with other PwC Member Firms as further set out in this Statement. Other PwC Member Firms may either process your personal information on behalf of the Data Controller or for the same purposes as set out herein under Section 3. In addition, each PwC member Firm whom you contracted with may determine jointly with other PwC Member Firms the purposes and means of processing of your personal information. Each Member Firm in the PwC network is a separate legal entity (see [www.pwc.com/structure](http://www.pwc.com/structure) for details). For a list of territories in which PwC Member Firms operate, please refer to Section 4 for details.

If you wish to contact us in relation to this Statement, please refer to Section 7 (Your Rights

to Personal Data and Contacting Us).

### **Note to data subjects in the EEA**

**If you are a data subject in the EEA and you are contacted by another PwC entity or a third party from within the EEA who collects and processes your personal data in the EEA in connection with your ongoing (or potential) Employment or contractual relationship with PwC, please refer to the European Transparency Notice Addendum in Appendix 2 where we set out additional information about our processing and information about your additional rights in respect of your personal data under EEA data protection laws.**

***Example:** By way of an example, this would apply where an EEA-based entity corresponds with you on behalf of PwC in connection with backgrounds checks that it undertakes in the EEA in respect of your Employment or contractual relations with PwC. If you are a data subject located in the EEA and require further information of where these additional requirements apply in the context of our use of your personal data, please contact us.*

## **2. Categories of Personal Data**

Throughout the course of your Employment and/or contractual relationship with PwC, PwC may collect and create your personal data, including the following data:

- basic identity information (e.g. name, job title, grade, line of service/business unit, work address, office location, and date and place of birth)
- education, training and professional qualification details (e.g. academic background, examination records, learning and training records, professional bodies memberships)
- employment history (e.g. resume, work experience information)

PwC may also collect and create the following personal data which may be regarded as Special categories and/or Sensitive personal data/Information under relevant laws including the following:

- contact details (e.g. home and correspondence address, email address, home and mobile phone numbers)
- personal identifiers (e.g. staff ID, photo, GUID or other work-related online or IT identifier and the recent password, government identifiers, identity card details, nationality and passport details)
- financial details (e.g. personal investments and accounts with banks or other financial institutions)
- biometric information (e.g. fingerprints, facial feature)
- Information concerning property
- Information concerning online identification symbols (e.g. IP address and location)

For the list of Special categories and Sensitive personal data that we may process for the purposes as set out in this Statement, please refer to definition in Appendix 1.

We will generally collect personal data directly from you, but on occasion, we may also collect it from third party sources (e.g. collecting references and work experience from

previous employers and referees or from educational institutions) or by use of technologies (e.g. cookies or location tracking devices) where necessary and appropriate. We may collect personal information about you from other means such as social media or other third-party sites. We may also generate certain personal data by combining some of your personal data with other personal data we collect from elsewhere.

We may also collect and process basic identity and contact details of your family, dependents, beneficiaries and emergency contacts on a need to know basis. Where we collect personal data of other individuals from you (e.g. your emergency contact, family members, friend, etc.), you warrant that you have informed him/her of the purpose(s) for which we require his/her personal data and all other relevant arrangement described in this Statement relating to the processing and use of personal data and that he/she has consented to your disclosure of his/her personal data to us after being informed of all of the above.

### **3. Purposes of Collection and Process of Personal Data**

To the extent necessary, we may collect, disclose and otherwise process your personal data in connection with the purposes including:

#### **Performing and managing the Employment and/ or our contractual relationship with you, including:**

- managing, exercising and enjoying our respective rights and obligations (e.g. contractual or statutory obligations) in connection with our Employment and/or contractual relationship
- administrative and operation activities (including finance, payroll and administration of benefits and compensation)
- facilitating human resources and human capital management, reference checking, performance appraisals, career development activities (e.g. learning and training activities), and reviews of employment decisions
- in connection with disciplinary proceedings
- verifying that you were previously engaged by us (in an Employment context or otherwise) in connection with an alumni programme
- undertaking equality and diversity reviews in connection with our business, including participation in PwC network equality and diversity initiatives

#### **Managing our business activities, including:**

- business development, client engagements (including client acceptance checks) and staffing administration and engagements
- making relevant information about your basic identity information, contact details, qualifications, skills, expertise, business interests, travel profile and availability to work (both local and overseas) available to clients, potential clients, other PwC Member Firms and Third Parties for the business purposes set out in this Section
- facilitating compliance checks (internal and external) such as code of ethics and independence, and related outcomes (e.g. disciplinary processes)
- facilitating crisis management(e.g. business continuity plan and testing)
- acquiring and disposing parts of our business

#### **Administration of IT Systems and Applications, including:**

- sharing your personal data to run systems and applications to effect administrative, operational and financial efficiencies and streamline data governance processes
- administration of information and database, technology infrastructure, security and monitoring
- development, and integration of IT and operating systems
- to authenticate your identity, or authorize access to systems (including, database, websites and applications) for Employment and work related purposes.

**Compliance with applicable laws, policies and professional rules, including:**

- implementing PwC policies, controls and procedures, including but not limited to those related to quality control and risk management
- complying with obligations imposed by applicable laws, regulations, industry rules and professional requirements
- performing or complying with obligations under the PwC network's regulations, policies and standards, including the PwC Network Information Security Policy and PwC Network Data Protection Policy
- in connection with legal, administrative or regulatory inquiries or proceedings as necessary

**Employee / IT usage monitoring**

- As a technology enabled firm, our IT systems and applications, and keeping them secure and up-to-date, are key to our business. That means we use your information to the extent necessary to operate, administer, manage, improve and analyse performance and use of the IT systems and applications we or any other PwC firm uses
- This usage includes monitoring your use of those systems and applications for security purposes and in order to comply with our obligations under applicable law.
- You consent to PwC's access to PwC Firm-issued device (e.g., computer, mobile phone, etc.) and your personal devices using PwC Firm facilities, including internet connections (e.g., firm Wi-Fi) for non-work related purposes, for collection, processing and use of your personal data, including on-line shopping IDs, personal emails, communications records and content, location information, browsing records, emails and messages contained in such devices for the following purposes
  - For security reasons (e.g. to check for the introduction of viruses and malware and to monitor whether the use of the email system or the internet is legitimate and in accordance with PwC policies and applicable law)
  - To find lost messages or retrieve messages due to computer failure
  - To assist in investigations of alleged wrongful acts affecting us
  - As part of any discovery or disclosure exercise or in relation to possible litigation
  - To detect and prevent fraud, unlawful or improper activities
  - To protect our confidential information; and/or
  - To comply with any legal obligation.

**Event organization:**

- to facilitate registration and identity authentication for conferences or events organized by PwC or hosted by a third party for PwC
- to facilitate the security of events
- to facilitate training and knowledge sharing (e.g. webcasts, seminars) and related

feedback/evaluation

## **Others**

- to undertake of internal surveys
- to conduct research, benchmarking and data analysis
- to participate in Quiz, discussion in message forums and Chat Groups (e.g. Spark)
- to subscribe for publications and merchandise (e.g. PwC Brand Merchandise)

and purposes connected to any of the above purposes.

Use of personal data (if any) for purposes under “Others” will be basic personal data only (such as name, job title, grade, line of service/business unit, and office location) and you may choose whether or not to provide any sensitive personal data (as defined).

## **4. Classes of Transferees/Categories of Recipients**

The personal data collected may be recorded, organized, structured, stored, held, processed, disclosed, and used by us to meet the purposes described in this Statement. Such personal data may be transferred to, processed by and stored with, the following classes of transferees/categories of recipients.

### **Network Member Firms**

As PwC is a global network with Member Firms around the world, your personal data may be transferred to other PwC network firms (and their respective subsidiaries and affiliates), processed, and stored outside the country where you are located. Each network firm is a separate legal entity. For a list of countries and territories in which PwC network of firms operate, please see <http://www.pwc.com/gx/en/office-locations/index.jhtml>. This includes countries and territories outside your location that may not have laws that provide specific protection for personal data.

### **Third party service providers and other transferees**

We may transfer or disclose your personal data to Third Party service providers, contractors, subcontractors, agents, suppliers, current/prospective clients, government and regulatory authorities, industry associations and professional bodies, and other business contacts whether local or overseas in relation to any of the purposes described in this Statement. PwC Member Firms, our service providers and sub-processors they engage may use servers and other resources in various countries and territories to process your information. Your information may also be transferred to service providers that are not members of the PwC network (Third Party service providers) to process on a PwC firm’s behalf.

Third Party service providers and other transferees may include bankers, insurers, brokers, medical practices, administrators and managers of provident fund schemes, providers of IT services, identity management, website hosting and management, data analysis, data back-up and archiving, security and storage services (including cloud service providers), travel agents, event management companies, government authority (e.g. immigration and tax authority), and service providers for employment activities, human resources, administrative, operation and financial support, and pre-employment activities (e.g. screening and training). Such transferees provide services such as administrative, telecommunications, computer, and other services with respect to the operation of our business.

The Third Party providers may use their respective subsidiaries and affiliates, and their own Third Party subcontractors that have access to personal data (sub-processors). It is our policy to use only Third Party providers that flow those same obligations down to their sub-processors.

PwC's service providers, their sub-processors, and other transferees set out in this Section are bound to maintain appropriate levels of security and confidentiality, to process personal information only as instructed by PwC and comply with applicable laws and regulations.

You may be asked to provide personal information (where necessary) direct to PwC authorized service providers or sub-processors that we engage in connection with the above purposes.

Where third parties collect data directly from you either on our behalf or otherwise in connection with your Employment or contractual relationship with PwC, you are encouraged to review such third parties' privacy practices (for example any privacy notices they include on their websites or data collection forms) before disclosing any personal data. You acknowledge that, unless the relevant third parties are acting as our authorized agents, we shall have no responsibility for the appropriateness of their privacy practices.

### **Other disclosures**

We may also disclose personal information to third parties under the following circumstances:

- when explicitly requested by you;
- when required to deliver publications or reference materials as requested by you;
- when required to facilitate conferences or events hosted by a third party;
- for regulatory compliance purposes; and/or
- as otherwise, set out in this Statement.

We or other PwC Member Firms may disclose information about you to law enforcement, regulatory and other government agencies and to professional bodies and other third parties, as required by and/or in accordance with, applicable law or regulation, or if PwC is involved in a merger, acquisition, or sale of all or a portion of its assets. This includes disclosures outside the country you are located. PwC Member Firms may also review and use your personal information to determine whether disclosure is required or permitted.

### **International transfers**

As PwC is a global network with Member Firms and Third Party service providers will locate around the world, your personal information may be transferred to and stored outside the country where you are located.

You consent to the transfer of your personal data outside the home territory where you are located, including Mainland China, Hong Kong SAR, and Macau SAR to territories that may not have laws that provide an adequate level of protection for personal data. In such circumstances, we will ensure your personal information shall be protected in the same manner as if your personal information is processed in your jurisdiction

## **5. Security of Personal Information**

PwC has implemented generally accepted standards of technology and operational security, including standards required under applicable law, in order to protect personal data against

accidental, unauthorised or unlawful access, use, processing, alteration, disclosure, transfer, erasure, loss of the personal data. PwC personnel follow a security policy. Only authorized persons are provided access to personal data and such persons are obliged to ensure confidentiality.

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 or by us. We will be responsible for any failure of our physical systems, technology or management error result in any unauthorized disclosure or compromise to your personal data.

We will let you know in accordance with applicable law if a breach occurs that may have compromised the privacy or security of your personal data.

We will assess the personal information security impact regularly to comply with basic principles for personal information security under applicable law and when new requirements are effective and legally binding and take appropriate actions to protect personal information.

## **6. Retention Period**

It is our policy not to retain personal data longer than is necessary for the fulfilment of the purposes for which the data are or are to be used. We will retain your personal data for as long as it is required for any of the purposes described above. For example:

- Personal data of unsuccessful applicants will be retained for two years for future recruitment purposes.
- We will retain certain personal data of former employees when they cease to be employed by us for employment related activities including, but not limited to: the provision of job references, processing applications for re-employment, matters relating to retirement benefits and allowing us to fulfil contractual or statutory obligations. This will generally be for the duration of the period within which claims can be brought under the Employment or other contract or under statute.

PwC may also retain your personal data to the extent we are required or permitted to do so by applicable law or regulation.

## **7. Your Rights to Personal Data and Contacting Us**

Unless there are exception in applicable law, you may have certain rights in relation to the personal information we hold about you.

- **Right to access your personal data**

You have the right to request access to your personal data in accordance with applicable law. If your employer is a Member Firm in Mainland China, you have the right to request us to provide to you: (a) a description of the type of personal data we hold about you, including a general account of its use, its source; and (b) what personal data has been made available to Third Parties, and you may also request a copy of the basic personal data, personal identity information and personal healthcare information that we have about you.

- **Right to correct your personal data**

You have the right to request us to correct any personal data we hold about you if you think they are incorrect or incomplete.

- **Right to request erasure of your personal data**

If your employer is a Member Firm in Mainland China, you have the right to request us to erase your personal data if:

- your personal data has been given to or collected by us in violation of any applicable law;
- our use and collection of your personal data is contrary to what we have agreed with you;
- we collect and use your personal data without obtaining any consent from you;

In such circumstances, if we receive your request to delete your personal data, we will also notify third parties whom we have transferred your personal data to delete personal data they hold about you.

- **Right to revoke any consent on our use of your personal data**

Even if you have given us consent to collect, use, share or disclose some or all of your personal data, you can opt-out any time by requesting us to cease the processing of your personal data for certain purposes, limit our sharing of personal data with Third Parties etc. However, if you do so, we may not be able to manage your Employment with us which depends on having such personal data.

Under certain circumstances permitted by applicable law, we may refuse to accede to your requests above. For example, we may be required to retain your personal data throughout the course of your Employment or contractual arrangement to comply with applicable laws or to fulfill our contractual obligations. In such circumstances, we will promptly notify you of the reasons for refusing to accede to your requests.

For security purposes, you may be required to provide written requests or prove your identification in other ways. We will respond to your request within the time required under applicable law. We may charge a fee for your request to access your information, if permitted by applicable law.

## **CONTACT US**

If you wish to exercise any of these rights, under applicable privacy law, or have questions about how your information is handled at any time, or to make complaints, please send your request to our Human Capital Administrator through [HR.Helpdesk@Asia](mailto:HR.Helpdesk@Asia).

If your employer is a Member Firm in Mainland China, you may be entitled to additional rights under applicable law and any dispute in relation to the manner in which we collect and process your personal data under this Statement may be subject to arbitration.

If you feel aggrieved on any matter in respect of this Statement, please attempt to resolve it by discussion with our Human Capital Administrator through [HR.Helpdesk@Asia](mailto:HR.Helpdesk@Asia). Any unresolved dispute arising from or in connection with this Statement shall be submitted to China International Economic and Trade Arbitration Commission in Beijing for arbitration, which shall be conducted in accordance with the commission's arbitration rules. The arbitral



tribunal shall consist of three arbitrators who shall be appointed in accordance with the commission's rules. The arbitral award shall be final and binding upon both parties.

**If you are a data subject in the EEA when you provided your personal data to us, you may be entitled to additional rights (see European Data Processing Addendum at Appendix 2).**

## **8. Children**

We understand the importance of protecting children's privacy. This Statement is not designed for or directed for individual under the age of 18 or any minor as defined under applicable law.

Where personal information of a child (e.g. your child) is collected with consent of his or her parents, we will process such information only when it is permitted by the child's parent or guardian or it is necessary to do so to protect the child.

## **9. Changes to this Statement**

We may need to update this Statement from time to time to comply with applicable law and regulations or other legitimate purposes. We will not make any change that will affect your rights under this Statement without first obtaining your consent as may be required by applicable law. If we make any material changes, we will notify you of the change and amend the revision date this Statement. You can find a copy of the most updated version of the Personal Information Collection Statement in our firm's Staff Handbook.

## **10. Acceptance of this Statement**

PwC is strongly committed to protecting your personal information. PwC is committed to maintaining your trust in us and we observe the general principles of data protection under applicable laws.

By clicking the box below, you acknowledge you have read this Statement and give PwC explicit consent to the processing (as defined) of your personal data (including Special categories and/or Sensitive personal data) for purposes as described under Section 3 (Purposes of Collection and Process of Personal Data) of this Statement.

## Appendix 1: Definition

“Data Controller(s)”	in relation to personal data, means a person, entity, or organization either alone or jointly or in common with other persons, determines the purposes and means of the collection, holding, storing, transferring, other processing or use of the personal data.
Data subject	means the individual who is identified or identifiable from the personal data.
Data processor	means a party which processes personal data on behalf of a data controller and does not process the personal data for any of the party’s own purposes
EEA	The member states of the European Union plus Iceland, Liechtenstein, Norway and Switzerland
Employment	means (a) employment under a contract between the employer and employee on a term of service (including direct employment and secondment), or (b) engagement or appointment under a contract between you and us to execute any work or labour (e.g. as a partner, member, shareholder, officer and director, independent contractor, consultant, and advisor), and related expression shall be construed accordingly.
“Personal data”/ “Personal information”	refers to any information or data (in a form in which access to or processing as practicable) relating directly or indirectly to a living or natural individual from which independently or in combination with other information it is practicable for the identity of the individual to be directly or indirectly ascertained or for the activity of the natural person to be directly or indirectly ascertained
Personal identifier	means an identifier that (a) is assigned to an individual by a data user for the purpose of the operations of the user; and (b) that uniquely identifies that individual in relation to the data user, but does not include an individual’s name used to identify that individual.
PwC, we and us	refers to the PwC firm with whom you applied or contracted with for Employment (as defined) and who acts as Data Controller in relation to the process of your personal data and other Member Firm that process your personal data in accordance with this Statement
Processing	means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated

	means, such as collection, recording, organization, transferring, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction
Special categories of personal data	<p>The following are examples of Special categories of personal data under applicable law in EU and Macau SAR:</p> <ul style="list-style-type: none"> <li>• personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation</li> </ul>
Sensitive personal data /information	<p>The following are examples of Sensitive personal data under applicable Mainland China regulations/ guidance:</p> <ul style="list-style-type: none"> <li>• Personal financial information (e.g. bank account, credit and transaction history, real estate information etc.)</li> <li>• information concerning the health and psychological status of an individual (e.g. records formed from an individual's illness and treatment, particulars of treatment, medical history of his or her family, history of present illness or infectious diseases, etc.)</li> <li>• Biometric information of an individual (e.g. genetic data, fingerprints, vocal prints, palm prints, facial features, etc.)</li> <li>• Identification information of an individual (e.g. identity card, passport, driving license, work license, social insurance cards, residence permit, etc.)</li> <li>• Information concerning online identification symbols (e.g. system account password, answers to questions asked to protect the password etc.)</li> <li>• Other information (e.g. sexual orientation, marital history, religious belief, records of undisclosed violations and crimes, communication records and the content thereof, whereabouts and tracks, web browsing history, residential address, GPS location, etc.)</li> </ul>
"Third Party"	<p>means any party other than PwC or you, including but not limited to:</p> <ol style="list-style-type: none"> <li>a) providers of data related services, including data storage and processing service providers;</li> <li>b) other service providers, subcontractors, agents and other third parties acting on behalf of any PwC network firm;</li> </ol>

	<p>c) current/perspective clients, and other business contacts; and</p> <p>d) government and regulatory authorities; institutional, industry or organizational bodies; and professional bodies.</p>
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## Appendix 2: Transparency Notice for Data subject in the EEA under the EU General Data Protection Regulation

**Note:** If you are a data subject in the EEA and you are contacted by another PwC entity or a third party from within in the EEA who collects and processes your personal data in the EEA in connection with your ongoing or potential Employment or contractual relationship with PwC, this addendum, which forms part of the wider Statement, sets out the additional information that we are required to provide to you, and the additional rights that you may have in respect of your personal data. You should read this together with the main body of the Statement.

*Example: this would apply where an EU-based entity corresponds with you on behalf of PwC in connection with backgrounds checks that it undertakes in the EU in respect of your Employment or contractual relations with PwC. If you are a data subject located in the EU and require further information of where these additional requirements apply in the context of our use of your personal data, please contact us.*

### A. How do we collect information about you?

We usually collect information from you directly, but we also collect it from Third Party sources such as your previous employers, referees, education institutions, law enforcement agencies and government bodies.

### B. What legal basis do we have for using your personal data?

When we use your information, we take care to ensure that it is used in an appropriate way. Use of personal data under EU data protection laws must be justified under one of a number of legal “grounds” and we are required to set out the grounds in respect of each use in this policy. An explanation of the grounds can be found here.

For the purposes of complying with European law, we do not need to collect your consent in order to process your personal data (except in limited circumstances where we process your sensitive personal data, where we may sometimes require your consent (see section below on our use of your sensitive personal data)). Instead, we rely on the grounds described in this section to justify our use of your personal data. Therefore, where we request your consent to the processing of your personal data, other than in the limited circumstances where consent is required under European law (as described below), we are seeking this consent pursuant to other laws that we are subject to and the consent collected applies to the processing of personal data that is subject to those laws.

*These are the principal legal grounds that justify our use of your information:*

<p><b>Consent:</b> where you have consented to our use of your information (you will have been presented with a consent form in relation to any such use [and may withdraw your consent through the privacy preferences dashboard]).</p>
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<p><b>Contract performance:</b> where your information is necessary to enter into or perform our contract with you.</p>
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<p><b>Legal and regulatory obligation:</b> where we need to use your information to comply with our legal and regulatory obligations.</p>
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<p><b>Legitimate interests:</b> where we use your information to achieve a legitimate interest and our</p>
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*reasons for using it outweigh any prejudice to your data protection rights.*

**Legal claims:** *where your information is necessary for us to defend, prosecute or make a claim against you, us or a third party.*

**Employment legal obligations and rights:** *where our legal duties as employers necessitate the processing*

Generally, where we are processing your personal data in an Employment context, we process your personal data on the basis that it is necessary to do so in connection with your individual contracts of Employment and where our legal duties as an employer necessitates it. We may also process your Personal Data for our legitimate interests, such as to defend and prosecute legal claims and rights, and our other business interests. Where we do so we will mitigate any effect this may have on your privacy by appropriately minimizing our use and putting in place adequate access and security safeguard to prevent unauthorized use.

More specifically, we justify our use of your personal data in the manner set out in section 3 of the Statement as follows.

**i. Performing and managing the employment and / or our contractual relationship**

*Use justification:* contract performance, employment legal obligations and rights, legal obligations and legitimate interests (to enable us to effectively manage our staff and contractors and their fitness for work)

**ii. Managing our business**

*Use justification:* legal obligations, legal claims, and legitimate interests (to enable us to cooperate with law enforcement and regulatory authorities and to allow us to operate and change our business)

**iii. IT systems and applications**

*Use justification:* legitimate interest (ensuring the smooth operation of our IT infrastructure)

**iv. Compliance with applicable laws, policies and professional rules**

*Use justification:* legal obligations, legitimate interests (to enable us to achieve a consistent approach to compliance across our business)

**v. Internal surveys and event organization**

*Use justification:* legitimate interests (to enable us to monitor the satisfaction and views of our staff and to help us grow our business)

**vi. IT support, security and staff authentication and identification**

*Use justification:* contract performance / employment legal obligations and rights, legitimate interests (to enable use to ensure the security of our systems)

**vii. Staff monitoring**

*Use justification:* legal obligation/ employment legal obligations and rights, legitimate interests (to assist with the prevention of crime and fraud)

### **Use of Special Categories of personal data**

In limited the circumstances in which we may need to process your Special Categories of personal data, e.g. in connection with criminal records checks, such use of your Special Categories of personal data will generally be justified on the employment legal obligations and rights or legal claims ground (as indicated above). Where this is not the case we will generally ask for your consent unless we can rely on another legal ground, in which case we will inform you of such ground.

### **C. Where do I go for further information?**

If you have questions about how we use your information, please contact [HR Helpdesk@Asia](mailto:HR.Helpdesk@Asia).

### **How do we transfer and store information about you?**

Please see “**4. Classes of Transferees/Categories of Recipients**” above for details of who we may share your personal data with.

Your personal data may be accessed by staff or suppliers in, transferred to, and/or stored at, a destination outside of the EEA in which data protection laws may be of a lower standard than in the EEA.

Certain countries and territories outside the EEA have been approved by the European Commission as providing essentially equivalent protections to EEA data protection laws and therefore no additional safeguards are required to export personal information to these jurisdictions. In countries and territories, which have not had these approvals, we will transfer it:

- i. to other PwC Member Firms subject to terms of an intra-group data transfer agreement;
- ii. to third parties subject to an export solution that is permitted under applicable laws that imposes data protection obligations directly on the recipient,

unless we are permitted under applicable data protection laws to make such transfers without such formalities.

Please contact us at the contact details in C above if you would like to see a copy of the specific safeguards applied to the export of your personal information.

### **D. How long will we keep information about you?**

Please see under “**6. Retention Period**” above.

### **E. Your rights**

FOR USE FROM 25 MAY 2018: If you have any questions in relation to our use of your personal data, you should first contact your home firm or our Human Capital Administrator through [HR Helpdesk@Asia](mailto:HR.Helpdesk@Asia).

Under certain circumstances, you may have the right to require us to:

- provide you with a copy of your information;
- provide you with further details on the use we make of your information;
- update any inaccuracies of personal data that we hold; or
- delete any personal data that we no longer have a lawful ground to use,

or you may have the right to:

- where processing is based on consent, withdraw your consent so that we stop that particular processing;
- object to any processing based on the legitimate interests ground under our reasons for undertaking that processing outweigh any prejudice to your data protection rights; or
- restrict how we use your information whilst a complaint is being investigated.

Your exercise of these rights is subject to certain exemptions to safeguard public interest (e.g. the prevention or detection of crime) and our interests (e.g. the maintenance of legal privilege). If you exercise any of these rights, we will check your entitlement and respond in most cases within a month.

If you are not satisfied with our use of your personal data or our response to any exercise of these rights, you have the right to lodge a complaint with a relevant supervisory authority.