



# KPMG Central Privacy Statement

# KPMG Central Access Privacy Statement

The KPMG Central application is a collaboration tool provided by KPMG International Cooperative, along with the KPMG member firm (individually and collectively “KPMG”) engaged by your company or the company for whom you are granted authorized access to KPMG Central, that allows a group of users to access a virtual data repository for the purpose of sharing information and engaging in online discussions.

This Privacy Statement explains what personal information related to users is collected in connection with the operation of KPMG Central, how this information is used and what controls are in place.

## PERSONAL INFORMATION COLLECTED BY KPMG CENTRAL

KPMG Central collects personal information, including personal data, about users in connection with the engagement or project for which the KPMG Central system has been provided. Personal information may include name, role, country, e-mail address, office phone number, cell phone number, and other information that is directly relevant to user authentication or the fulfilment of KPMG's business obligations under the engagement or project.

Where we will process personal data, we will do so as outlined in the KPMG International Privacy Statement ([LINK](#)), as further outlined in this KPMG Central Access Privacy Statement and in the KPMG Central Cookies Notice ([LINK](#)).

Access to personal information about a user is only permitted to those individuals who need to know that information in connection with the engagement or project for which the KPMG Central system has been provided. KPMG Central incorporates technological and operational security policies and procedures to protect user's personal information from loss, misuse, alteration or unintentional destruction. Where KPMG Central is supported by KPMG, its personnel who have access to such information have been trained to maintain the confidentiality of such information.



Once a site has been deleted pursuant to the retention policies outlined below, personal information will also be deleted if there is no longer a legitimate business need to keep such information.

## **DISCLOSURES OF PERSONAL INFORMATION**

Where KPMG supports KPMG Central due to the particular engagement or project for which KPMG Central has been provided, then KPMG does not disclose any personal information about the user, except as indicated herein or otherwise agreed with the user, or as permitted or required by applicable law (for example if required by a Court Order or if KPMG believe that such action is necessary to prevent fraud or cyber-crime or to protect KPMG Central or the rights, property or personal safety of any person) or professional standards. Additionally, KPMG may, in providing supported KPMG Central services, receive personal information from its clients or may contract with other service providers to assist in performing certain services. Any such services are provided under KPMG's supervision, and the service providers agree to maintain the confidentiality of the user's personal information to only use this personal information to the extent necessary to perform their functions and to comply with KPMG's policies regarding the use of such information.

## **TRANSFERS OF PERSONAL INFORMATION**

KPMG may, depending on the engagement or project for which KPMG Central has been provided, transfer, process and use user's personal information outside the country in which the user is located in order for KPMG to fulfill its business obligations. For example where KPMG Central – External Collaboration is supported by KPMG across its global data centers rather than through local hosting of KPMG Central, personal information may be accessed in any country in which KPMG member firms operate. Accordingly, a user's data may be accessed, processed and used in countries where the data protection laws of the country in which user is located do not apply.

Where KPMG provides hosted or supported services depending on the engagement or project for which KPMG Central is deployed, KPMG may, store a user's personal information anywhere in the world in facilities operated by KPMG and/or third parties on behalf of KPMG. Therefore, the

user's information may be shared in part with third party suppliers to KPMG, provided that the third parties have agreed to maintain the security and confidentiality of such personal information. A user's personal information will never be sold or made available to other parties for any other purposes unless required by law, other legal processes or professional standards. KPMG may track the usage of the site by a user, but information about such usage of the site will only be shared with selected internal (i.e., KPMG) audiences and used in order to evaluate the site and its features so that KPMG may make improvements to it. KPMG may also make a user's personal information anonymous (e.g., remove any identification about user and preserve user's confidentiality). Anonymous data may be placed in a KPMG database for the development of future products.

## **RETENTION OF DATA**

Data within KPMG Central may be deleted by each site user as per their access rights. A governance process has been put in place to require the Primary Site Owner to validate that their site is still in use every six months. When a site is deleted (and such request for deletion has been confirmed with the Primary Site Owner), or when data is removed from the system, such data will be held on the backup tapes until overwritten, which occurs on a 90 day cycle. KPMG Central 2013 provides the ability for member firms to adjust the data retention policy based on local requirements, and it is the member firm's responsibility to notify the KPMG Central 2013's administration team accordingly.

## **CONTACTING KPMG**

KPMG recognizes its responsibility for protecting the privacy of your personal information. If you have questions or comments about our administration of your personal information or wish to change or delete your personal information in KPMG Central, please contact your KPMG Client Service Team or Engagement contact. The KPMG Client Service Team or Engagement contact can also address any concerns you may have regarding compliance with this Privacy Statement for KPMG Central.

