

Last updated: September 2022

Privacy Notice / EY MillionYou Platform

1. Introduction

This Privacy Notice is intended to describe the practices EY follows in relation to the EY MillionYou Platform (the “Platform”) with respect to the privacy of all individuals whose personal data is processed and stored in the Platform. This Privacy Notice should be read together with the [ey.com Privacy Statement](#), and in case of any conflict with the [ey.com Privacy Statement](#), the terms of this Privacy Notice will prevail. Please read this Privacy Notice carefully.

2. Who manages the Platform?

“EY” refers to one or more of the member firms of Ernst & Young Global Limited (“EYG”), each of which is a separate legal entity and can determine the purposes and means for data processing in its own right (i.e. act as a data controller or in a similar capacity). The entity that is acting as data controller (or similar capacity) by providing this Platform on which your personal data will be processed and stored is EY Crowdsourcing sp. z o. o., Rondo ONZ 1, 00-124 Warszawa, Poland.

The personal data in the Platform is shared by EY Crowdsourcing sp. z o. o. , Rondo ONZ 1, 00-124 Warszawa, Poland, Poland, with one or more member firms of EYG and EYGS LLP (see “Who can access your personal data” section 6 below).

The Platform is hosted externally in an EY Azure Platform (CTP Managed) in Amsterdam, the Netherlands.

3. Why do we need your personal data?

To facilitate live collaborations and conversations with EY users and Clients. The platform allows many to many interactions and authentic conversations. The users connect to a large group to collaboratively drive inspiration, insights, ideas, validation, and advocacy while working with the clients to meet at the intersection of business objectives to ensure high engagement levels and drive long term value.

Your personal data processed in the Platform is used as follows:

The Tool uses data to prepare synthesized reports from the data collected by the users without disclosing the user information where they could answer the client challenges and objectives. The tool also uses data to prepare anonymised reports about the user activity and personalised reports about the best comments, ideas on the platform where the participation of users is voluntary. The tool also analyses the sentiments in the discussions to provide indication to the moderators about positive or negative sentiment, based on users’ comments. Data provided by the users might also be used to drive next phases of collaboration through the platform.

Clients can decide if discussions on the platform are anonymous (i.e. users won’t see who submitted a specific comment) or not. Surveys, contests are always anonymous as only the user can see their answer.

Data left by the users might also be used to drive next phases of collaboration i.e. ask follow-up questions about opinions/ideas left on the platform.

EY MillionYou team can also reach out to users by email to re-activate them with the hope to increase engagement on the platform or to inform them of functionality/legal changes.

EY relies on the following basis to legitimize the processing of your personal data in the Platform:

For EY Staff:

Legitimate interests, in particular to enable EY to undertake a global survey (via crowdsourcing) which will ultimately assist EY client entities to discuss on EY MillionYou Platform.

Processing of your personal data is necessary for the purposes of the legitimate interests pursued by the data controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data. The specific legitimate interest(s) are to enable EY to undertake a global survey (via crowdsourcing) which will ultimately assist EY client entities to discuss on EY MillionYou.

You have the right to object at any time, on grounds relating to your particular situation, to the processing of personal data concerning you based on the above legitimate interest(s).

For Former EY Partners and employees, EY Alumni, Clients, former clients, vendors and former vendors:

Personal data is processed based on consent. The provision of the personal data to EY is optional. However, if you do not provide all or part of your personal data, we may be unable to carry out the purposes for processing. You have the right to withdraw your consent at any time.

Users are able to opt-out from some notifications (i.e. when someone replies to their comment made on the platform).

4. What type of personal data is processed in the Platform?

The Platform processes these personal data categories:

- First name & last name
- Age range
- Gender
- Country
- Email address
- Office Location/Position
- Sub-service line
- Personal views, opinions posted on/reflected on the platform through posts

Categories of Personal data that would be processed for external clients:

- First name (nickname on the platform)
- Last name
- Email address
- Password (specific to the platform)
- Personal views/opinions posted on /reflected on the platform through posts

Depending on the projects, the clients may define some additional onboarding questions, where other personal data based on questions would be processed.

This data is provided directly by EY Partners, employees or contractors and through a feed from other EY systems via GHRDB. The users register or log in themselves in the Platform.

Client data is provided directly by Clients.

External vendors will provide data about users from specific sector/region/social group.

5. Sensitive personal data

No sensitive data is collected by the tool.

Sensitive personal data reveals your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health or data concerning sex life or sexual orientation.

EY does not intentionally collect any sensitive personal data from you via the Platform. The Platform's intention is not to process such information.

6. Who can access your personal data?

Your personal data is accessed in the Platform by the following persons/teams:

Group name	Identify country	The action that the group performs	Identify whether access is read, update, add	Provide the approx. number of users with access
EY Administrator	Global	Management of the users and the platform	Read/Write/Delete Restricted, location-based access may apply due to legal constraints	Less than 10
Moderators	Global	Management of the platform and the content on the platform	Read Write/Delete	Less than 100
EY Clients	Global	Access the platform to participate in activities.	Read/Write (their own data only)	Unlimited
EY professionals	Global	Access the platform to participate in activities.	Read/Write (their own data only)	Unlimited
Client Technology	Global	Server maintenance	Read/Write/Delete	Various
Client's project team	Global	Access to the platform in capacity of normal user & access to reports.	Read/Write (their own data only)	Various
Marketo Platform Administrator	Global	Transfer of user data for users who have requested a subscription to an EY marketing newsletter.	Read/Write (their own data only) - describes access on MillionYou platform	Various

The access rights detailed above involve transferring your personal data to the Netherlands and Poland, both of which are within the European Economic Area. An overview of EY network entities providing services to external clients is accessible [here](#) (See Section 1 (About EY) - “View a list of EY member firms and affiliates”). EY will process your personal data in the Platform in accordance with applicable law and professional regulations in your jurisdiction. Transfers of personal data within the EY network are governed by EY’s [Binding Corporate Rules](#).

We transfer or disclose the personal data we collect to third-party service providers (and their subsidiaries and affiliates) who are engaged by us to support our internal ancillary processes. For example, we engage service providers to provide, run and support our IT infrastructure (such as identity management, hosting, data analysis, back-up, security and cloud storage services) and for the storage and secure disposal of our hard copy files. It is our policy to only use third-party service providers that are bound to maintain appropriate levels of data protection, security and confidentiality, and that comply with any applicable legal requirements for transferring personal data outside the jurisdiction in which it was originally collected.

To the extent that personal data has been rendered anonymous in such a way that you or your device are no longer reasonably identifiable, such information will be treated as non-personal data and the terms of this Privacy Notice will not apply.

7. Data retention

Our policy is to retain personal data only for as long as it is needed for the purposes described in the section “Why do we need your personal data”. Retention periods vary in different jurisdictions and are set in accordance with local regulatory and professional retention requirements.

In order to meet our professional and legal requirements, to establish, exercise or defend our legal rights and for archiving and historical purposes, we need to retain information for significant periods of time.

The policies and/or procedures for the retention of personal data in the Tool are the total retention period is defined and will be implemented in accordance with the EY [Records Retention Global Policy](#) and the relevant [Country Retention Schedule \(CRS\)](#).

Log Data will be retained in accordance with the [EY IT Logging Policy](#).

After the end of the data retention period, your personal data will be deleted.

8. Security

EY protects the confidentiality and security of information it obtains in the course of its business. Access to such information is limited, and policies and procedures are in place that are designed to safeguard the information from loss, misuse and improper disclosure. Additional information regarding our approach to data protection and information security is available in our [Protecting your data](#) brochure.

9. Controlling your personal data

EY will not transfer your personal data to third parties (other than any external parties referred to in section 6 above) unless we have your permission or are required by law to do so.

You are legally entitled to request details of EY's personal data about you.

To confirm whether your personal data is processed in the Platform or to access your personal data in the Platform or (where applicable) to withdraw your consent, contact your usual EY representative or email your request to global.data.protection@ey.com.

10. Object, rectification, erasure, restriction of processing or data portability

You can confirm your personal data is accurate and current. You can object to the processing of your personal data or request rectification, erasure, restriction of processing or a readily portable copy of your personal data by contacting your usual EY representative or by sending an e-mail to global.data.protection@ey.com.

11. Complaints

If you are concerned about an alleged breach of privacy law or any other regulation, contact EY's Global Privacy Leader, Office of the General Counsel, 6 More London Place, London, SE1 2DA, United Kingdom or via email at global.data.protection@ey.com or via your usual EY representative. An EY Privacy Leader will investigate your complaint and provide information about how it will be handled and resolved.

If you are not satisfied with how EY resolved your complaint, you have the right to complain to your country's data protection authority. You can also refer the matter to a court of competent jurisdiction.

Certain EY member firms in countries outside the European Union (EU) have appointed a representative in the EU to act on their behalf if, and when, they undertake data processing activities to which the EU General Data Protection Regulation (GDPR) applies. Further information and the contact details of these representatives are available [here](#).

12. Contact us

If you have additional questions or concerns, contact your usual EY representative or email global.data.protection@ey.com.