

Information to staff on data protection by EY

Effective date: November 22, 2022

1. Method of use of the data subject's personal data

1.1. Introduction

This privacy policy represents a statement regarding how EY entities in Italy (the "**company**" and "**we**") use personal data relating to partners, employees, temporary staff and consultants and interns (the "**data subject**" and "**your**"). "EY" means the global organization and/or one or more of the legal entities that are part of the Ernst & Young Global Network, each of which is an autonomous legal entity.

This privacy policy incorporates [global and local data protection policies \(personal and non-personal\)](#) that define the principles applicable to the use of personal data within EY. The policies and this privacy policy refer to any type of processing of personal data of the data subject.

The purpose of this notice is to provide the data subject with help in understanding why we may use his or her personal data and how. This Notice may be supplemented by additional disclosures, policies or guidelines ("additional policies"). Where such additional policies are in any way inconsistent with this Notice, this Notice will apply only to the extent that it is consistent, or can be made consistent, with those additional policies.

1.2. Types of personal data about the data subject that we may retain

"Personal data" means information about data subject with which the data subject can be identified, including information that may be protected under applicable privacy or data protection laws. EY collects, uses, or otherwise processes different types personal data that relate to the data subject, depending on the circumstances, contract type, role, and under the law; such data may include:

Categories of personal data	Examples of types of personal data <i>Please note that the examples are illustrative and not exhaustive</i>
Data that relate to the data subject:	Name, address, date of birth, marital status, nationality, gender and language spoken, information on any disabilities, work restrictions and/or accommodations required, health and wellness information.
Contact information to track the person (work or home):	Name, address, telephone and e-mail address.
Information on people to contact in case of emergency (from person concerned or from us):	Name, address, telephone, e-mail address and their relationship to the data subject.
Data with which they can be identified:	Photos, passport and/or driver's license details, electronic signatures.

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Data related to the data subject's eligibility to work for us and/or EY's clients:	References, notes following interviews, work permit ID information, such as passport details and driver's license information, documentation/results related to pre-employment checks (work history, certificates and diplomas, registration as a professional or political officer of an organization).
Information on skills and experience of the person concerned:	CVs and/or applications, references, documentation of qualifications, skills, training courses and other compliance requirements.
Data and information on the data subject's conditions of employment with EY:	Letters of offer and acceptance of employment, person's employment contract, location, billing and underwriting information.
Information needed to be able to pay the person concerned:	Bank details, social security or national insurance numbers (if any and where necessary), compensation and benefits, expense reimbursement.
Information necessary to ensure benefits and other rights to the data subject:	Information, health information, leave requests.
Information related to business travel expenses:	Bank details, passport, driver's license, vehicle registration and insurance details.
Information needed to be able to grant <i>fringe benefits</i> and other rights to the data subject:	Information on working hours, requests for special leave.
Information related to the data subject's pension rights:	Social security benefits, pension base, annual pension accrual, pension rights
Information related to the job performance of the person concerned:	Performance evaluations and judgments, leadership judgments, financial interests, management positions, goals, records performance reviews, development records and/or notes individual and other meetings, personal development plans, training courses indicated and completed, personal improvement plans, postings, correspondence, reports.
Information related to sickness and absence management:	Absence and attendance records, start and end dates of sick reporting, sick certificates, percentage of sickness and absences per employee, address at which an employee is being treated (if different from home address)
Information on disciplinary actions, grievances, and other work-related proceedings:	Notes or documentation concerning interviews/meetings, correspondence.
Information on subject's independence and EY's independence:	Financial interest, including generally available information on debt, stocks, marketable financial bonds issued by banks, mutual funds, funds of hedge funds, money market funds, mutual funds of

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	<p>investment and other investment structures of EY employees or spouses (or equivalent) and/or parties financially dependent on the above. Financial interests held through a financial product or investment arrangement, owned by EY employees, spouse (or equivalent) or financially dependent parties of the above, such as generally available securities related to:</p> <ul style="list-style-type: none"> (i) investment insurance; (ii) retirement investments; (iii) investments in investment companies; (iv) Separate investments in trusts; and (v) Discretionary accounts managed by others. Other financial relationships, such as loans, brokerage relationships, deposits, and insurance data. Information on employment relationships of family members. <p>Intermediaries/investment accounts, deposits, credit cards, other loans, real estate interests, insurance policies, employer-sponsored retirement savings plans, private investments.</p>
Information related to personal and family relationships in the workplace:	<p>Name, function, role, nature of relationship, and whether this relationship may involve a risk of conflict of interest or other risks that need to be addressed to prevent misunderstandings, claims of favoritism, unfair treatment, or claims of sexual harassment.</p>
Information to access our buildings and systems:	<p><i>Global People Number (GPN)</i>, computer or facility access and authentication information, identification codes, passwords, answers to security questions, photographs, video images (including those captured via CCTV).</p>
Information related to the use of corporate computing devices and tools, or personal computing devices (BYOD) used to access corporate resources, information, and tools:	<ul style="list-style-type: none"> • Regarding electronic devices made available to staff by EY Italia or EYG: serial number or unique identifier of the mobile device, MAC (Media Access Control) address, IMEI (International Mobile Equipment Identity), IMSI (International Mobile Subscriber Identity) corresponding to the SIM card, and IP address from which you connect. Device ID (SEP mobile ID), device model, unique device identifier, and serial number. • EY Italia and EYG will process information related to access and use EY's business tools necessary to maintain network security, data such as IP address, user name in the domain and active directory, and dates and times of access and use different applications, such as the Office 365, Canvas or Mercury package, in all cases respecting the privacy protection standards of the data subject; for this, when possible, EY will aggregate or

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will pseudonymize the data of the aforementioned, in accordance with social customs and constitutionally and legally recognized rights.

The personal data of the data subject will be collected by EY during the induction process, at the beginning of the employment relationship and throughout the course of the relationship with the company. To the extent that EY processes the personal data of the person named by the data subject as emergency contact, the data subject confirms that he or she has notified the person that he or she is among EY's emergency contacts and, if necessary, has provided him or her with a copy of this policy.

1.3. What the data subject's personal data are for

EY will process the data subject's personal data if such processing: (i) is reasonably necessary for the performance of its employment contract; (ii) is reasonably necessary for the performance of a legal obligation to which EY is subject (e.g., as part of the employment relationship); or (iii) is in EY's legitimate interest as the data subject's employer and/or principal, primarily for the purposes listed below (items (i), (ii) and (iii) above are also referred to as the "legal basis for processing"). The collection of this personal data by EY is generally mandatory and, if it is not provided, EY will not be able to its legal obligations or perform its role as employer and/or principal. Where the collection of personal data is not mandatory, EY will inform the data subject in advance, as well as inform him or her of the implications of not providing such personal data.

In such cases we have carried out (or will have to carry out) a "legitimate interest assessment," in which an analysis of such legitimate interests, impact, proper balancing, and safeguards has been conducted. You may request a copy of said legitimate interest assessment from the address listed in this Notice. In any case, to the extent that the data processing activity is based on a legitimate interest, at any time the data subject may also exercise his or her right to object to such processing for reasons related to his or her situation. In such a case, we undertake to stop processing the data subject's personal data unless we can demonstrate compelling legitimate grounds for processing that override the interests, rights and freedoms of the data subject or for the establishment, exercise or defense of legal claims.

1.3.1. The company uses the data subject's personal data for a variety of purposes, including but not limited to:

Purposes for which we need the data subject's personal data	Examples Please note that these examples are illustrative and not exhaustive.	Legal basis applicable to treatment	Basis for processing special categories of personal data
Input:	Suitability of the person concerned working for EY	Art. 6, par. 1(b) and Recital 44 of the GDPR: Execution of pre-contractual measures for the execution of the (future) employment contract	Does not apply
	Carry out the activities of management of requests received from the candidates		
	Perform a pairing specific with the vacancies		

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	Conducting screening, assessments and interviews		
	Record keeping correspondence		
	Bidding and propose contracts of work		
	Collect the documents and perform verifications provided for inclusion in EY, including the assessment of the requirements of the candidate to work in EY		
	Carrying out checks on criminal history and administrative records, if required by the law and within the limits of what is specified in this Disclosure.		
Human Resources ("HR"), finance and other purposes of administration corporate:	Insertion of the staff, planning of resources, postings, allocation of skills, engagement management, termination of the employment relationship and the succession of activities in the role	Art. 6, par. 1(b) Of the GDPR: Required for execution of the contract of employment	
	Planning and administration of finance and budget	Art. 6, par. 1(b) Of the GDPR: Required for execution of the labor contract	
	Billing and payments	Necessary for the execution of the labor contract	

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	Register of attendance and hours working	Art. 6(1)(c) of the GDPR: "the treatment is necessary to fulfill an obligation legal to which it is subject the holder of the treatment."	
	Planning and development, organizational and force management work, including the monitoring of the effectiveness of the our policies for equal opportunities and the fair treatment and consistent of members of staff and candidates for recruitment.	Art. 6(1)(c) of the GDPR: "the treatment is necessary for fulfill an obligation legal to which it is subject the holder of the treatment."	Peer data opportunities: the treatment is necessary In the area of law of labor, of the social security and protection social
	Planning and administration of salaries, envelopes pay and benefits, including salaries, deductions tax, equalization tax, premiums, insurance health or other type as well as pensions offered/coordinated by EY as an employer working	Art. 6, par. 1(b) Of the GDPR: Required for execution of the contract of employment	
	Strength development employment, education, training and certification, preservation of updated records of qualifications professional, of the enrollments and of the schedules of continuous development professional	Art. 6, par. 1(b) Of the GDPR: Required for execution of the contract of employment	
	Training purposes and quality	Art. 6, par. 1(b) Of the GDPR: Required	

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		For execution of the labor contract	
	Management and performance evaluation information (including performance and work history)	Art. 6(1)(f) GDPR: EY's legitimate interest in human resources finance and administration	
	Problem resolution, which conducting internal reviews, complaints, investigations, audits, and disciplinary procedures	Art. 6(1)(c) of the GDPR: "processing is necessary for compliance with a legal obligation which the controller is subject."	To the extent that special categories of personal data are processed, the processing is necessary in the context of labor, social security, and social protection law or with regard to the institution, exercise, or defense of legal actions
	Management of corporate travel and expenses	Art. 6(1)(b) GDPR: Necessary for the performance of the labor contract.	
	Business reporting and analysis	Art. 6(1)(f) GDPR: EY's legitimate interest in human resources finance and administration	
	Management of flexible work arrangements	Art. 6(1)(b) GDPR: Necessary for the performance of the labor contract	
	Managing the enrollment and participation of personnel found eligible for the activities and programs offered, donations to entities such as unions, nonprofit organizations, contributions to action committees	Art. 6(1)(b) GDPR: Necessary for the performance of the labor contract	

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	policy and welfare activities		
	Promotional and marketing materials and activities, including the use of quotes, photos and videos of employees	Art. 6(1)(f) GDPR: Legitimate interest of EY in acquiring business and providing customer services	
	Client proposals, offers, and quotes, including the use of employees' resumes and results obtained by employees.	Art. 6(1)(f) GDPR: Legitimate interest of EY in acquiring business and providing customer services	
	Occupational accidents and illnesses, including management of personnel health and safety and management of disabilities, illnesses, and absences.	Art. 6(1)(c) of the GDPR: "processing is necessary for compliance with a legal obligation which the controller is subject."	To the extent that special categories of personal data (e.g., health data) are processed, the processing is necessary in the context of labor, social security, and social protection law
	HR helpdesk support and case management as they arise	Art. 6(1)(b) GDPR: Necessary for the performance of the labor contract	
	Communicating with and facilitating communication between the data subject and others (including through voicemail, e-mail, and electronic collaborations)	Art. 6(1)(b) GDPR: Necessary for the performance of the labor contract	
	Compliance with regulatory requirements, including reporting on conflicts of interest, gifts, and hospitality	Art. 6(1)(c) of the GDPR: "processing is necessary for compliance with a legal obligation which the controller is subject."	

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	Risk management	Art. 6(1)(c) of the GDPR: "processing is necessary for compliance with a legal obligation which the controller is subject."	
	Monitoring and assessing compliance against the EY Code of Conduct and other EY policies and regulations (e.g., the <i>IT Code of Connection</i>)	Art. 6(1)(c) of the GDPR: "processing is necessary for compliance with a legal obligation which the controller is subject."	
Diversity and Inclusion (D&I)	Attention to diversity and inclusion in customer service delivery, people development, and exercising leadership in communities	Art. 6(1)(f) GDPR: Legitimate interest of EY in promoting a culture of respect and equality in the workplace, so that all employees can feel free to be themselves	To the extent that special categories of personal data are processed (e.g., data revealing the ethnic origin of the data subject), processing is necessary in the context of labor, social security, and social protection law
	Achievement of D&I goals (e.g., regarding increasing the number of women and minority members in hiring/promotion)	Art. 6(1)(f) GDPR: Legitimate interest of EY in promoting a culture of respect and equality in the workplace, so that all employees can feel free to be themselves	To the extent that special categories of personal data are processed (revealing the ethnic origin of the data subject), processing is necessary in the context of labor, social security, and social protection law
Alumni	Interaction with EY alumni (former EY staff and consultants)	Legitimate interest in maintaining strong relationships alumni, send publications about EY and its services, invite alumni to the	

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		events and in helping them stay in touch with other alumni	
Security purposes	Physical access control	Art. 6(1)(b) GDPR: Necessary for the performance of the labor contract	
	Authorize, grant, administer, monitor, and terminate access , or use of, EY or third-party facilities, records, property, and infrastructure, including communication services such as company phones, laptops, tablets, and e-mail/Internet use.	Art. 6(1)(b) GDPR: Necessary for the performance of the labor contract	
	Video surveillance/CC TV	Art. 6(1)(b) GDPR: Necessary for the performance of the labor contract, and Art. 6(1)(c) of the GDPR: "processing is necessary for compliance with a legal obligation which the controller is subject."	
	Prevention and detection of violations of EY policies and procedures	Art. 6(1)(c) of the GDPR: "processing is necessary for compliance with a legal obligation which the controller is subject."	
	Crime prevention and detection	Art. 6(1)(c) of the GDPR: "processing is necessary for the performance of an obligation legal to which the	

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		subject is the data controller."	
Purposes of information technology ("IT") infrastructure administration	Access control and monitoring of the use of IT systems	Art. 6(1)(b) GDPR: Necessary for the performance of the labor contract	
	Reporting, management and resolution of IT failures		
	Administration, support, development, management and maintenance of systems		
	Cybersecurity threats		
Legal purposes	Fulfilling our legal obligations, including combating corruption, conflicts of interest, and money laundering	Art. 6(1)(c) GDPR: "processing is necessary for compliance with a legal obligation which the controller is subject"	
	Maintain a record of defaults, incidents, and/or data breaches		
Purpose of M&A	In the event of an acquisition or merger, provide information to a prospective acquirer of an EY legal entity (or part thereof) in Italy.	Art. 6(1)(b) GDPR: Necessary for the performance of the labor contract, and Legitimate interest of EY in handling business transactions, e.g., for purposes of restructuring, divestment, or spinoff of a specific (sub)service line or office.	
Purpose of audit	Provide relevant information to external auditors (e.g.	Art. 6(1)(c) of the GDPR: "the processing is necessary to fulfill an obligation	

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	statutory auditors, ISO auditors, etc.)	legal to which the data controller is the subject."	
Purpose of independence	Comply with EY's independence policy and local independence requirements	Art. 6(1)(c) of the GDPR: "processing is necessary for compliance with a legal obligation which the controller is subject."	
Ensure a safe working environment (avoiding conflicts of interest or other risks)	Comply with EY's policies on personal and family relationships in the workplace	Art. 6(1)(b) GDPR: Necessary for the performance of the labor contract	To the extent that special categories of personal data are processed, processing is necessary in the context of labor, social security and social protection law

1.4. Sensitive personal data (including special data categories)

Certain types of data are classified as "sensitive" for the purposes of European data regulations, so we are subject to additional restrictions on their use and storage.

The so-called "sensitive" personal data can be information related to:

- ▶ union membership.
- ▶ physical or mental health.

In general, explicit consent must be obtained from the data subject before such data can be stored and used. Consent is not required when the processing is necessary for the purpose of fulfilling the obligations and exercising specific rights of the data controller or the data subject in the context of employment, social security and social security law. Nevertheless, we may retain and use such information for limited legal purposes, such as monitoring compliance with our equal opportunity policies and health and safety regulations or, if necessary, to protect the vital interests of the employee, for legal claims or in the public interest.

In each case, we will clarify the purposes for which we wish to use data subject's sensitive data when it is collected as well as the legal basis on which such processing is based (e.g., fulfillment of legal obligations) and, should such processing be based on the data subject's consent, we will request it at that time. In such cases, the data subject may withdraw his or her consent at any time.

2. Quality of personal data

Subject to the steps that EY takes to ensure that the data is always accurate, the data subject is required to inform the company immediately of any changes that occur in relation to his or her data.

3. Sharing and disclosure of personal data

EY is committed to maintaining the confidentiality of information about you, your colleagues, and others with whom you may come into contact. We will also comply with all legal requirements regarding the sharing and disclosure of personal information. EY may disclose information to the following recipients in cases where it is lawful to do so:

- ▶ Central and local government departments and other public or statutory agencies such as tax authorities;
- ▶ Authorities charge of crime prevention and detection;
- ▶ Service Providers: we use third parties to provide services for some of our HR, IT and other activities. We share such information only when the third party has a valid reason to receive them for the purpose of providing the requested service to us. EY will only disclose the data subject's personal data to third parties who have agreed in writing to provide an adequate level of protection;
- ▶ Public Authorities: various regulatory and professional bodies have the power to request information from us our personnel and legal entity. We will strive to assist these bodies and authorities in the their investigations, but we will also try to enforce, as much as possible, the rights and privacy of our staff;
- ▶ External auditors;
- ▶ Insurance service and other flexible remuneration service providers;
- ▶ Other EY network entities: as a member of a global network, we may share information with other legal entities associated with EY. All EY entities are required to comply with the global data protection policy and the global privacy policy, under which information about our personnel is to be treated as confidential and reliably protected;
- ▶ Existing and potential customers;
- ▶ Other staff within the stakeholder's country and EY global network to facilitate systems operation collaborative work;
- ▶ Other third parties, only with the express consent of the data subject, e.g. mortgage lenders and potential employers.

4. International transfer of personal data

European data protection law prohibits the transfer of personal data outside the European Economic Area ("EEA") unless specific requirements for the protection of such personal data are met. We will only make such transfers if we are confident that the level of protection applied to the data subject's data will be similar to that which would have applied had they remained within the EEA. To the extent that this applies to the data subject, EY has adopted the so-called. *Binding Corporate Rules* to protect transfers of personal data within EY's global network. A copy of our *Binding Corporate Rules* is publicly available [here](#). For transfers outside the EY network, e.g., to our service providers, we enter into data transfer agreements based on the "Model Contractual Clauses" or rely on some other approved data transfer method to ensure adequacy.

The following are examples of where and how the data subject's data may be transferred, but keep in mind that this is not an exhaustive list and due to ongoing changes in our IT and operational infrastructure, this list may be subject to change:

- ▶ Germany, Singapore and the United States, where the servers for some of our global systems are located;
- ▶ To GDS centers in Poland, India, China, Argentina and the Philippines where some of our IT, HR and tax processing is done;

- ▶ To all EY legal entities outside the EEA with which we share information from global systems for work-related purposes, such as *LEAD*, *Canvas*, and *PACE*;
- ▶ To non-EEA regulatory bodies, such as the PCAOB, to enable them to assess our compliance with their regulations;
- ▶ To other EY legal entities outside the European Economic Area to systems integration appropriate use of resources;
- ▶ To external service providers who may support our IT or operational infrastructure. These service providers are bound by contractual terms that require them to process our data with a similar level of care and security as would be applied if they were in the EEA.

5. Period of retention of personal data

EY will retain the data subject's data in data retention policies line with its "" and applicable law. We will retain a data subjects personal data only for as long as is appropriate to fulfill the purposes for which EY collected it, unless the law permits or requires EY to retain it longer (for example, for the purpose of administering any benefits to which the data subject is entitled, such as a pension). As a general rule, we will retain a data subject's personal data for the duration of the administration of his or her relationship with EY plus the applicable statute of limitations period for any legal action.

6. Security and integrity of personal data

EY maintains appropriate administrative, technical, and organizational measures to safeguard confidentiality and integrity of the personal data of data subjects and to protect them from accidental or unlawful destruction, accidental loss, alteration, unauthorized disclosure or access, misuse, and any other unlawful form of processing of personal data in its possession. In compliance with data protection laws and EY's internal policies, EY addresses security at all points of its implemented technology infrastructure.

EY trains its staff on its data protection policies and procedures and only allows authorized staff access to the personal data of other data subjects on a ""need to know" basis ("need to have access to the data"), as required by their role in EY.

7. The rights of the data subject

As provided for in local and EU regulations, the data subject may have the right to:

- ▶ Request access to and obtain a copy of their personal data;
- ▶ Have their personal information changed if inaccurate;
- ▶ Under certain circumstances, request the deletion of their personal data;
- ▶ Under certain circumstances, restrict or object to EY's processing of personal data or request that it be sent to another employer;
- ▶ Request to receive their personal data in a structured, commonly used, machine-readable format.

For more information about your rights and how to exercise them, our Data Protection Officer (DPO) in Italy at dpo.italy@it.ey.com

8. Contact

For the purposes of European data protection regulations, the EY legal entity to which the data subject belongs assumes the role of *the data subject's personal data controller*. If you have any questions or complaints about this policy or the way we use your personal data,



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the data subject is requested to contact our Data Protection Officer in Italy at the following e-mail address:
.dpo.italy@it.ey.com

Those in the European Economic Area also have the right to file a complaint with the local supervisory authority:
<https://www.garanteprivacy.it/>

9. Updates to this policy

This Notice may be updated periodically and without notice to reflect changes in EY's privacy practices. EY will notify you of any significant changes to this Notice and will indicate at the top of Notice the date it was last updated.