## Last updated: December 2023

## Privacy Notice – Global Blockchain API Platform

### **Introduction**

This Privacy Notice is intended to describe the practices EY follows in relation to the Global Blockchain API (“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](https://www.ey.com/en_gl/privacy-statement), and in case of any conflict with the [ey.com Privacy Statement](https://www.ey.com/en_gl/privacy-statement), the terms of this Privacy Notice will prevail. Please read this Privacy Notice carefully.

1. **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:

* For the personal data of EY personnel: The data controller is the EY entity which employs you.
* For the personal data of third-party personnel (including EY clients): The data controller is the EY local member firm with which the third party has a relationship.

You can find a list of local EY member firms and affiliates on the [ey.com Privacy Statement](https://www.ey.com/en_gl/privacy-statement).

The personal data in the Platform is shared by the above data controller with one or more member firms of EYG (see “Who can access your personal data” section 6 below).

The Platform is hosted on servers externally in an EY Managed MS Azure Data Centre at US East.

1. **How does the Platform process personal data?**

The Platform serves as a central location for information and access to the API solutions available for subscription, where the clients can manage their account information and subscription information.

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

Personal data is used for identification, authentication, and communication.

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

For EY individuals and Client Individuals:

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 conducting client engagements, complying with regulatory and legal obligations, quality & risk management, including complying with EY policies.

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 Third Parties:

We process your personal data based on your consent. The provision of your 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.

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

The Platform processes these personal data categories:

* **First and Last Name**
* **E-mail Address**
* **Phone numbers**

This data is sourced from:

EY Personnel data is provided directly by EY Partners, employees or contractors and client data is provided directly by clients.

1. **Sensitive personal data**

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.

1. **Who can access your personal data?**

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

* The System Admin of the platform shall have access to the data. Individuals outside EY Organization shall not have access to the data.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **USer Group** | **LOCATION** | **PURPOSE** | **ACCESS** | **AMOUNT** |
| Group Name | Identity Country | Action That The group Performs | Identify if the action is read Update Add | Provide the Aprox Number of Users |
| End users/participants  (Account Owner- EY Partners, employees, EY contractors, EY client personnel) | Global | EY Prduct Access, Account Management, Subscription Management | Read/Write | 0-100 |
| End users/participants (Subscription Admin- EY Partners, employees, EY contractors, EY client personnel) | Global | EY Product Access, Subscription Management, | Read/Write | 0-1000 |
| End users/participants (Subscription users- EY Partners, employees, EY contractors, EY client personnel) | Global | EY Product Access | Read/Write | 1000-9999 |
| System Administrator (EY Personnel) | India, UK | Configuration of the platform -Setting up accounts, setting up subscription plans, creation of plans, products, update subscription for accounts, update user data for accounts/subscriptions | Read/Write | 1-10 |

The access rights detailed above involves transferring personal data in various jurisdictions (including jurisdictions outside the European Union) in which EY operates (EY office locations are listed at <https://www.ey.com/en_gl/locations>). An overview of EY network entities providing services to external clients is accessible [here](https://www.ey.com/en_uk/legal-statement) (See Section 2 (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](https://www.ey.com/en_gl/data-protection-binding-corporate-rules-program).

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.

1. **Data retention**

Our policy is to retain personal data only for as long as it is needed for the purposes described in the section “How does the Platform process 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 Platform are:

The total retention period is defined and will be implemented in accordance with the [EY Records Retention Global Policy](https://find.ey.net/discover/sitepages/home.aspx?detailPath=ZYFCSFS674FF-4-3034#detailPath=ZYFCSFS674FF-4-3034) and the relevant [Country Retention Schedule (CRS)](https://ig2.ironmountainconnect.com/ey/p/grs/section/country-retention-schedules).

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.

1. **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 [ey-protecting-your-data-brochure-v2.pdf](https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fassets.ey.com%2Fcontent%2Fdam%2Fey-sites%2Fey-com%2Fen_gl%2Ftopics%2Fconsulting%2Fey-protecting-your-data-brochure-v2.pdf&data=05%7C01%7CEvangelia.Mavrovounioti%40uk.ey.com%7C1a4a52e2631542f349d908db4bc8f0c2%7C5b973f9977df4bebb27daa0c70b8482c%7C0%7C0%7C638187098628892489%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=4aVx9v7vi%2FC%2Fw7zZjni1F89TCu6LSbe8hAPrfgxxMNA%3D&reserved=0) brochure.

1. **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.

1. **Your rights in relation to your personal data**

Depending on the applicable jurisdiction, you may have certain rights in relation to your personal data, including:

* To request details of the personal data EY processes about you and to access the personal data that EY processes about you
* To have your personal data corrected, for example, if it is incomplete or incorrect
* To restrict or object to the processing of personal data or request the erasure of your personal data
* To receive a copy of the personal data which you have provided to EY in a structured, commonly used and machine-readable format which you can re-use for your own purposes (known as “data portability”)
* Where you have provided consent to the processing of your personal data, the right to withdraw your consent.
* The right to complain to a data protection authority (see section “Complaints”)

If you have any questions about how EY processes your personal data or your rights related to your personal data, please send an e-mail to [global.data.protection@ey.com](mailto:global.data.protection@ey.com).

1. **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, 1 More London Place, London, SE1 2AF, United Kingdom or via email at [global.data.protection@ey.com](mailto: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 may have the right to complain to your country’s data protection authority. You may also have the right to refer the matter to a court of competent jurisdiction.

Certain EY member firms in countries outside the European Union (EU) and the UK have appointed representatives in the EU and the UK respectively to act on their behalf if, and when, they undertake data processing activities to which the EU General Data Protection Regulation (GDPR) and/or the UK General Data Protection Regulation (UK GDPR) applies. Further information and the contact details of these representatives are available below:

[EU data protection representative | EY](https://www.ey.com/en_gl/data-protection-representative)

[UK Data protection representative (ey.com)](https://www.ey.com/en_rs/uk-data-protection-representative)

1. **Contact us**

If you have additional questions or concerns, contact your usual EY representative or email [global.data.protection@ey.com](mailto:global.data.protection@ey.com).