Privacy Notice – Blockchain.ey.com platform

1. Introduction

This Privacy Notice is intended to describe the privacy practices EY follows in relation to the Blockchain.ey.com platform (“Tool”) with respect to the privacy of all individuals whose personal data is processed and stored in the Tool. 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 Tool?

“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 Tool on which your personal data will be processed and stored is Ernst & Young LLP and processed in connection with the Tool may be shared by Ernst & Young LLP with one or more member firms of EYG (see “Who can access your personal data” section 6 below).

The Tool is hosted on servers in an EY Managed MS Azure Data Centre in USA (East).

3. Why do we need your personal data?

The Tool acts as a service platform, and includes several products that leverage blockchain technology and allow the execution of smart contracts.

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

- To use the application
- To support use of the tool
- To register and authenticate user details (the data will be encrypted and unreadable for the vendor)
- To process data for KYC check, the data will be encrypted and unreadable for the vendor
- To gather and process cookies on the website
- To process the payments

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

Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.

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. (for example, in relation to KYC/ background checks).
• Quality & Risk Management, including complying with EY policies.

You may 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).

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

The Tool processes these personal data categories:

For all of the data subjects identified, the following information will be required for the platform to maintain a user profile:

• Full Name
• Email Address
• Password
• Cookie IDs associated with users’ activities on the Tool.

Should a user use an individual product within the Tool, the following additional personal data will be processed:

1. OpsChain Procurement Application
   a) Ethereum address - Used for sending and signing transactions to the Blockchain (ex: Executing Org. Registry Smart Contract to register an organization to the Blockchain). Used as payment address to transfer funds when the buyer issue invoice payment to the supplier

2. OpsChain Traceability
   a) User will be able to upload information or documents to be notarized, which may or may not include confidential or personal data - it is not the intention of the tool to process personal data. The information/document is processed to be notarized. Notarized documents might be stored by user in their user profile.

3. Tax Calculator (Similar process to Tax Chat, leveraging their onboarding process, separate, PIA questionnaire approved)
   a) Address (for KYC)
   b) Post code
   c) Date of birth
   d) Phone number
   e) Tax Calculator will collect the least information needed to properly to prepare a capital gains/loss report and US Form 8949
   f) Whether or not the individual’s spouse are in a Financial Reporting Oversight Role (“FROR”) 
   g) Passport and/or Driver License photo ID and/or Resident Card and/or Identity Card
   h) Individual client photograph

4. Data Visualization
   a) User has ability to input either Ethereum or Bitcoin address to find the transaction on these public networks.

5. Smart Contract testing
a) Smart contract code - users upload code to the application for testing, they can also design their own testing scenarios. They can choose to save and store both the uploaded code and testing scenarios. It is unlikely that any personal data will be processed.

6. Blockchain Analyzer
   a) An analytics product for reconciling clients books and records against the public ledger and analyzing the data uploaded. This includes reconciliation at both a transaction and address balance level. This version will be for public blockchains.

The data is sourced from:
- Client - The client who is using the Tool will provide the company name and the company's jurisdiction of incorporation.
- Created by EY - Based on client's input EY can create a purchase order, RFQ, etc. which might be consider confidential
- Publicly available sources – including public blockchain network which may be considered confidential.

5. 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, or other sensitive personal identifiers.

The following sensitive personal data may be collected and processed in connection with the Tool if a user uses the Global Tax Calculator:

- Personal data relating to criminal convictions and offenses;
- Data that may facilitate identity theft or fraud (like social security files, financial account numbers, credit card details and government identification numbers). ID for KYC and credit card information for payment

6. Who can access your personal data?

Your personal data may be accessed in the Tool by the following persons/teams:

The access rights detailed above may involve transferring personal data in various jurisdictions in which EY operates (EY office locations are listed at www.ey.com/ourlocations). 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 Tool 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.

7. Sharing your information

We may also 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 deidentified, aggregated or otherwise 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.

For data collected in the European Economic Area (EEA) or which relates to individuals in the EEA, EY requires an appropriate transfer mechanism as necessary to comply with applicable law. The transfer of personal data from the Tool to third party vendors, if any, is governed by an agreement between EY and the service provider that includes standard data protection clauses adopted by the European Commission.

8. 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:

- Data retention is in accordance with EY Records Retention Global Policy and the applicable Global, Area, Region or Country Retention Schedule. Please provide details of applicable retention period. If you do not have these details, please contact the Records and Information Management (RIM) team within Risk Management for assistance;
- Common Data is stored for the time period in which the user maintains a profile. If the user does not maintain a profile, this data is deleted after 2 years.
- Data from Tax Calculator will be stored in EY internal system (EY Interact) for 7 years to comply with EY Tax internal policies.

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

9. Cookies

The Tool uses first and third party "Cookies" in order to conduct data analytics and to collect data about content you interact with on the Tool to optimize your user experience.

A "cookie" is technology that allows the Tool to store tokens of information (an 'identifier') on your device while you are using the Tool. Cookies serve to help us track a user’s preferences when they use the Tool.

How do I disable cookies?

By accepting the “cookie banner” on the Tool and using the Tool you agree that we can place cookies in your browser. If you do not want to receive a cookie from the Tool, you have the option of setting your browser to notify you when you receive a cookie, so that you determine whether to accept it or not. However, please be aware that if you do turn off 'cookies' in your browser, you won't be able to fully experience some of the features of the Tool.

10. 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.

11. Controlling your personal data

EY will not transfer your personal data to non-EY third parties (other than any external parties referred to in Section 7 above) unless we have your permission or are required by law or professional obligation to do so.

You may be legally entitled to request details of EY’s personal data about you.

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

12. Rectification, erasure, restriction of processing or data portability

You can confirm your personal data is accurate and current. You can 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.

13. 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.

14. California Residents

If you are a resident of the State of California, you may have certain additional rights with respect to your personal data. Please visit our California Privacy Statement for more information. EY does not sell personal data collected in connection with the Services.

15. Contact us

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