

Last updated: 18 April 2022

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 a MS Azure Data Centre in USA (East) managed by EY.

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 of 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 Contract Manager

- 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 invoices payment to the supplier. Transactional information and information about the user's role within an organization with regards to those approving and viewing those transactions that may be stored to this product are for demonstration purposes only, per our website's terms and conditions defining that the Tool is intended for individual use only.

2. OpsChain Traceability

- a) User has the ability to upload information or documents to be notarized, which may or may not include confidential or personal data. It is not the intended function 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.
- b) Information that the user might add as metadata to tokens minted from this product should not be considered personal or private, and will be viewable on the public Testnet. Tokens minted on the Testnet from this product should be for demonstration purposes only, per our website's terms and conditions defining that the Tool is intended for individual use only.

3. Tax Calculator This Tool is currently only accessible to EY tax professionals and is not available for public use.

- 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 is 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. Event Monitor

- User has ability to input either Ethereum or Bitcoin address to find the transaction on these public networks. A record of a user's search for any wallet address or transactional hash may be stored by the website to aggregate and display most popular searches on our product.
- Smart Contract Testing Smart contract code: User has the ability to upload or paste code to the Tool for testing, and they can also design their own testing scenarios. They can choose to save and store both the uploaded code and testing scenarios. Personal data is not stored as part of this process unless the user inserts personal data into the smart contract code that they test with this tool. Smart contracts tested on this Tool should be for demonstration purposes only, per our website's terms and conditions defining that the Tool is intended for individual use only.

5. Blockchain Analyzer

This Tool is currently only accessible to EY professionals and is not available for public use. Future releases of this product that will be available for public use will allow the user to upload transactional data to the Tool for analyzation against the public ledger, which includes reconciliation at both a transactional and address balance level. Transactional data on the current and future versions of this Tool is stored securely within the Tool in accordance with EY's data protection and privacy policies.

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 the client's input, EY can create a purchase order, RFQ, etc. which might be considered confidential.
- Publicly available sources: including public blockchain networks, 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
{200707705 01062647}

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.