**Data privacy**

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**1. Introduction**

This Privacy Notice is intended to describe the practices EY follows in relation to the Ernst & Young Foundation’s Academic Resource Center (EYARC) website (the “Site”) and the EYARC Experience platform (the “Platform”) with respect to the privacy of all individuals whose personal data is processed and stored in connection with the Site or 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.  ​​​​​​​

**2. Who manages both the Site and 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 Site or the Platform on which your personal data will be processed and stored is the Ernst & Young Foundation (US).

The personal data in either the Site or the Platform may be shared by the Ernst & Young Foundation with one or more member firms of EYG (see “Who can access your personal data” section 6 below).

The Site is hosted on Microsoft Azure servers located in the U.S. The Platform is hosted on Amazon.

**3. Why do we need your personal data?**

The Site and the Platform both provide free educational resources for non-profit, higher education staff as part of the Ernst & Young Foundation’s philanthropic mission to support higher educations

Your personal data processed in the Site or the Platform is used to provide you access to the Site or the Platform and to analyze usage.

EY relies on your consent to legitimize the processing of your personal data in the Site and the Platform. 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.

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

The Site processes these personal data categories, sourced through the Site signup process.

* External users: First and last name, Email address, Name of associated educational institution
* Internal EY users: Rank, Service Line, Sub Service Line, Country, Office Location.

The Platform processes these personal data categories, sourced through the Platform’s signup process.

* External users: User (faculty) and participant (students) first and last names, email address, name of associated education institution, and performance on assignments on the platform.

The Site also uses Adobe Analytics (“Adobe”) in order to collect site usage analytics (e.g., page views, average time spent on page, links clicked, videos viewed, Country/City based on IP address, etc.) tagged to the visitor’s associated educational institution but not to name or email address. Data collected by Adobe is used for the following purposes: (i) to capture web metrics about the journey of users within the Site (e.g. pages viewed and links clicked); (ii) to analyse and understand overall Site traffic information; and (iii) to allow us to make informed decisions about our Site. EY Global Services Limited is the data controller for the purposes of this processing and licenses Adobe from Adobe Systems Software Ireland Limited, 4-6 Riverwalk, Citywest Business Campus, Saggart, Dublin 24, Ireland, who hosts it in London, United Kingdom.

The Platform also uses Google Analytics to collect site usage analytics (e.g., page views, average time spent on page, links clicked, videos viewed, location based on IP address, etc.) linked to the visitor's associated educational institution but not to personal identifiers like name or email address. Data collected by Google Analytics is used for the following purposes: (i) to capture web metrics about user journeys within the Site (e.g., pages viewed and links clicked); (ii) to analyze and understand overall Site traffic information; and (iii) to enable us to make informed decisions about the Site's content and design. The data controller for this processing is EY Global Services Limited, which licenses Google Analytics from Google LLC, located at 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. The data is hosted on Google's servers.

**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.

EY does not intentionally collect any sensitive personal data from you via the Site or from you or the student users via the Platform. Both the Site and Platform’s intentions are not to collect or process such information.

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

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

* Members of the Ernst & Young Foundation team who manage the Site and Platform, including content and results.
* Members of EY Technology who provide technical support for the Site and the Platform.

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](http://www.ey.com/ourlocations)). An overview of EY network entities providing services to external clients is accessible [here](https://www.ey.com/en_uk/legal-statement) (See Section 1 (About EY) - “View a list of EY member firms and affiliates”). EY will process your personal data in the Site 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).

**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.

**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 Site are as follows: once your access to the Site is deactivated, we will retain your data for 37 months and archive it for 90 days, after which the data will be deleted. For the Platform, we will "delink" student responses, making it impossible to associate specific responses with individual students, at the request of the faculty. If the faculty does not request this, we will still perform this delinking process at least annually. Additionally, we will delete student usernames and email information every three years, unless students have consented to participate in research studies. In such cases, we will retain email information until a request for deletion is made. We will delete faculty information when they request it.

**9. 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](https://assets.ey.com/content/dam/ey-sites/ey-com/en_gl/topics/consulting/ey-protecting-your-data-brochure.pdf) brochure.

**10. 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 6 above) unless we have your permission or are required by law or professional obligation to do so.

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

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

* 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.

**12. 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](https://www.ey.com/en_gl/data-protection-representative).

**13. US State Privacy Rights**

Depending on the US state you reside in, you may have certain additional rights with respect to your personal data.  Please visit our [US State Privacy Statement](https://www.ey.com/en_us/california-privacy-statement) for more information. EY does not sell personal information collected in connection with the Tool.

**14. Contact us**

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