## **Accenture Skills to Succeed Learning Exchange**

## **Summary of Privacy Policy**

Accenture believes that providing accurate and adequate notice about the services will inform choices and decisions about how to use the service and will better protect its users' privacy. If you have any questions or comments about this Policy, please contact us using the contact information provided at the end of this section. What do you need to know? This privacy policy sets out the rules on how we handle your personal information, it explains why we collect your information, what we do with it and when we will destroy it.

To make it easier to understand we have provided a summary of our policy. The summary is not the complete set of rules, it is just an overview. The official set of rules always count and are binding. For example, if you think something went wrong, we will check the full set of rules and summary - the full set of rules (i.e., our full privacy policy) can be found below the summary.

We collect the information that you give us when you fill in registration forms. We can use this information to register you or address your questions / complaints or give you information.

We also collect information you upload on our website or from your registering organization. We use information about you to improve our program or website or do research. Except as otherwise outlined in this Policy, we do not collect personal information from the users of services.

Your experience is useful so we may ask you questions about your experience during the program or afterwards. For instance, we may ask you what has happened since completing the program, for example have you started a new job or gone into further education. We do this because we want to know if our program is of benefit to you or if we need to change anything.

You don't have to provide us with any information, or answer any of our questions if you don't want to. If you don't do so, we may however not be able to provide you with the Skills to Succeed Learning Exchange.

We use a program to keep track of your IP address, so that we can analyze data of the people visiting our website. When someone visits our website, a little program is put on your computer. This is called a cookie. We use several cookies, most of them will not identify you or your behavior. One cookie we use, remembers your personal settings or likings for our website. For example, you may increase the font when reading or makes it possible for you to comment on a blog. Do not worry, our cookies cannot track what you do on other sites. They are only there to help us understand our visitors and their behavior. They don't gather any other information about you.

The Skills to Succeed Learning Exchange may have links to other websites, we do not make those websites, so what happens there is out of our control and we cannot be blamed if something goes wrong there. We advise you to read their privacy policies as well.

After completing your course, you may choose to set up a LinkedIn.com Profile as part of your future career development. LinkedIn.com is a third party application and you should check their privacy policy for how they will collect and use your information. Any information you post on your LinkedIn.com Profile Page will be publicly available subject to the settings you choose in LinkedIn.com.

Your personal information will be stored on secured servers which may not be located in your own country, and it will remain secure at all times.

You can exercise certain rights in relation to your personal information, including the right to reach out to us and ask what information we have on you by emailing us at Learningexchange.Can@accenture.com.

## **Full Privacy Policy**

## Your privacy

The Skills to Succeed Learning Exchange is an online employability learning solution managed and run by Accenture PLC and/or its affiliates ("Accenture").

You can read more about who we are on our website and at https://www.accenture.com/us-en/legal-countries-incorporation.aspx. Any Accenture entity located outside the European Union will be represented by Accenture PLC.

The purpose of the Skills to Succeed Learning Exchange ("Learning Exchange") is to provide online learning content and off-line exercises to support job seekers and their employment advisors / job coaches. This policy explains how any personal data we may collect from or about you for the purpose set out above by means of this site, will be processed, and protected by Accenture.

This site may, from time to time, contain links to and from the sites of our partner network and others. If you follow a link to any of these sites, please be aware that these sites have their own privacy policies. Please check these policies before you submit any personal data by means of these sites. If you have any questions now or during your visit of the site, please contact us at Learningexchange.Can@accenture.com.

## What information do we gather?

Accenture collects information relating to you in two ways: (1) directly (for example, when you provide information to sign up to use the Learning Exchange); and (2) indirectly (for example, through our site's technology or registering organizations). We do not make participation conditioned on the disclosure of more personal information than is reasonably necessary to participate in the Learning Exchange.

We may collect and process the following information:

- Information that you provide by registering to use the Learning Exchange and filling in forms during and/or after using the Learning Exchange.
- If you contact us or send us feedback, we may keep a record of that correspondence.
- Any postings, comments or other content that you upload or post to this site.
- Our site collects information about your computer, including (where available) your IP address, operating system and browser type, for system administration, to filter traffic, to look up user domains and to report on statistics.
- Details of your visits to our site and resources you access (including but not limited to, traffic data, location data, weblogs and other communication data). Please see the Cookies section below for more information.
- Information that we receive about you from our partners in the Learning Exchange, including
  your registering organization. This information will also be subject to that partner's privacy
  policy.

When this information relates to or identifies you, it is "personal data".

Except for certain information that is required by law, your decision to provide any personal information to us is voluntary. You will therefore not be subject to adverse consequences if you do not provide personal information. However, please note that if you do not provide certain information, we may not be able to accomplish some or all of the purposes outlined in this privacy policy, and you may not be able to use the Skills to Succeed Learning Exchange where it requires the use of such personal data.

# How and on what legal basis do we use information that we collect from the site?

We use your personal data for the following purposes, and on the following legal bases:

Purpose	Legal basis
To provide you with information that you request from us.	Justified on the basis of our legitimate interests of communicating with participants of the Skills to Succeed Learning Exchange.
To allow you to participate in interactive features of the Learning Exchange, when you choose to do so.	Justified on the basis of our legitimate interests of managing the Skills to Succeed Learning Exchange.
To notify you about changes to the Learning Exchange and its services.	Justified on the basis of our legitimate interests of communicating with participants to the Skills to Succeed Learning Exchange.
To ensure that content from the Learning Exchange is presented in the most effective manner for you and for your device.	Justified on the basis of our legitimate interests of managing and improving the Skills to Succeed Learning Exchange.
To follow up with you in the future directly by email or via your learning provider to check your progress or to ask if you want to test new material.	Justified on the basis of our legitimate interests of communicating with participants to the Skills to Succeed Learning Exchange.
To follow up with you in the future directly by email or via your learning provider to track your experience so we can use this for research, development and enhancement purposes.	Justified on the basis of our legitimate interests of managing and improving the Skills to Succeed Learning Exchange.
To track your use of the Learning Exchange (e.g., courses completed) and create aggregate reports of this for reporting purposes.	Justified on the basis of our legitimate interests of managing the Skills to Succeed Learning Exchange.
We analyze your IP and browser information to determine what is most effective about our site, to help us identify ways to improve it and, eventually, to determine how we can tailor our site to make it more effective.	Justified on the basis of our legitimate interests of managing and improving the Skills to Succeed Learning Exchange.

You will read that we often justify our use of your personal data on the basis of our legitimate interests. Where this is the case, we take great care to ensure that we take into account your rights, for instance by being transparent to you on how we use your personal data, and by giving you the rights described in the section "Your rights" below.

In addition, we may use your personal data, for such other purposes which we would describe to you at the point where it is collected.

Will we share your personal data with outside parties?

We generally only disclose personal data to the following third parties:

- our contracted service providers and advisors;
- third parties in the event that we sell or liquidate any part of our business or assets, including the running of the Learning Exchange;
- public authorities where necessary in order to comply with any legal obligation.

Where we disclose your personal data we shall do so in accordance with our legal obligations. Before sharing any personal data with third parties, we take steps to ensure that your personal data will be given adequate protection as required by relevant data protection laws and Accenture's internal policies. Any transfers of your information to third parties outside the European Economic Area (EEA) will be based on an adequacy decision or are governed by the standard contractual clauses (a copy of which can be obtained from dataprivacyofficer@accenture.com). Any other non-EEA personal data-related transfer will take place in accordance with the appropriate international data transfer mechanisms and standards.

#### What about data security?

We take appropriate steps to maintain the security of personal data collected via Accenture's site. You should understand that the open nature of the Internet is such that information and personal data may flow over networks connecting you to our systems without security measures and may be accessed and used by people other than those for whom the data is intended.

Our site may, from time to time, contain links to and from the sites of our partner networks, advertisers and affiliates. If you follow a link to any of these sites, please note that these sites have their own privacy policies and that we do not accept any responsibility or liability for these policies or sites. Please check these policies before you submit any personal data to these sites.

# Where will your personal data be processed?

As a global organization, personal data we collect may be transferred internationally throughout Accenture's worldwide organization.

If you are based within Europe this may include transferring your information to outside the European Economic Area. We have internal policies in place to ensure an equivalent level of protection is in place for your information throughout across our organization. Specifically, any transfers of your information to other Accenture offices outside the European Economic Area will be governed by Accenture's binding corporate rules (a copy of which can be found <a href="here">here</a>). A list of the Accenture offices that may process your information, and their contact information, can be found <a href="here">here</a>.

## How long do we retain your personal data?

We determine the retention period of your personal data based on the following retention criteria:

- we retain your personal data as long as we have an ongoing relationship with you;
- we retain your personal data where we are required to do so by a legal obligation to which we are subject;
- we retain your personal data where this is advisable to safeguard or improve our legal position (for instance in relation to statutes of limitations, litigation, or regulatory investigations).

## **Your rights**

You are entitled (in the circumstances and under the conditions, and subject to the exceptions, set out in applicable law) to:

- request access to your personal data this right entitles you to know whether we hold personal data about you and, if we do, to have access to that personal data;
- request rectification of your personal data: this right entitles you to request your personal data to be corrected or completed if it is inaccurate or incomplete;
- request erasure of your personal data: this right entitles you to request the erasure of your personal data, including where such personal data would no longer be necessary to achieve the purposes;
- object to the processing of your personal data: this right entitles you to request that Accenture no longer processes your personal data;
- request the restriction of the processing of your personal data: this right entitles you to request that Accenture only processes your personal data in limited circumstances, including with your consent;
- request a copy or the portability of your personal data: this right entitles you to receive a copy
  of personal data that you have provided to Accenture.

Please contact us at <u>Learningexchange.Can@accenture.com</u>, or contact our data protection officer at dataprivacyofficer@accenture.com, if:

- you have a general question about how Accenture protects your personal data privacy;
- you wish to exercise your data privacy rights;
- you wish to make a complaint about Accenture's use of your data;
- vou have general gueries about Accenture.

If, despite our commitment and efforts to protect your personal data, you believe that your data protection rights have been violated, you have the right at all times to lodge a complaint with a supervisory authority, either in the country where you live, the country where you work or the country where you deem that data protection law has been infringed.

## **Cookies**

One way that we collect information is through the use of cookies. Cookies are small files of information that save and retrieve information about your visit to our tools and websites. Please read our cookies policy for further information on this.

If, despite Accenture's commitment and efforts to protect your personal data, you believe that your data privacy rights have been violated, we encourage and welcome individuals to come to Accenture first to seek resolution of any complaint. You have the right at all times to register a complaint directly with the relevant supervisory authority or to make a claim against Accenture with a competent court (either in the country where you live, the country where you work or the country where you deem that data privacy law has been infringed). CONTACT US to exercise any of your rights.

**ADDITIONAL INFORMATION.** For complete details and additional information as to how Accenture processes and secures your personal data and Accenture's commitment to protecting your privacy, review Accenture's **GLOBAL PRIVACY STATEMENT.**