

## **Third Party Tracker Privacy Statement**

Last updated: April 2021

### ***Introduction***

Third Party Tracker is an offering of PricewaterhouseCoopers Advisory Product Sales LLC (“PwC”), a wholly-owned subsidiary of PricewaterhouseCoopers LLP, the US firm of the PricewaterhouseCoopers global network of firms. For further details on the structure of the global network of firms, please [www.pwc.com/structure](http://www.pwc.com/structure).

PwC is committed to protecting your privacy. This privacy statement explains the types of information we collect when you use or access Third Party Tracker (also referred to as the “Site”), and how we use, share, and protect this information. Note, this privacy statement applies solely to Third Party Tracker and does not apply to other PwC websites or applications.

### ***Information Collection***

When you access or otherwise use the Site, we will collect information about you and how you interact with the Site. We collect information about you through: (i) information you provide; (ii) automated technologies; and (iii) third parties.

### ***Information You Provide***

We collect information, including personal information that you provide. PwC will collect limited personal information as part of the user registration process, either directly from you or transferred to PwC by your employer or an organization with which you are affiliated, including your name and business contact information, such as your email address and phone number. We also collect information about your device, browser, IP address and location when you log on and use Third Party Tracker.

Companies licensing Third Party Tracker (“Companies”) may request that third parties provide additional personal information through survey responses into Third Party Tracker. Companies may also request that PwC assists them in collecting additional personal information about these third parties from publicly accessible data sources. PwC processes such information under the direction of such Companies, and has no ownership of such information. PwC also is not responsible for how Companies use such information. Companies are responsible for complying with any regulations or laws that require providing notice, disclosure, and/or obtaining consent prior to the collection and processing of such information.

Please do not provide information about yourself or otherwise that you do not wish for PwC or the applicable Company to collect, use, or otherwise process. If you have any concerns or questions about the collection and processing of your personal information, please contact the Company in question.

### ***Automatically Collected Information***

We may use online identification technologies, such as cookies. The information we collect using these technologies includes: user name, device, usage details, browser, IP address, operating system, browser type, mobile information, and location. Cookies are small text files placed on your device that assist us in providing a more customized website experience. For example, a cookie can be used to store registration information in an area of the site so that a user does not need to re-enter it on subsequent visits to that area.

In order to properly manage the Site, we may also anonymously log information on our operational systems, and identify categories of visitors by items such as domains and browser types. These statistics are reported in the aggregate to our webmasters. This is to ensure that our website presents the best web experience for visitors and is an effective information resource. Further information about cookies used on Third Party Tracker is available [here](#).

If you are concerned about cookies, most browsers permit individuals to decline cookies. In most cases, you may refuse or delete one or more cookies and still access the Site, but Site functionality may be impaired. After you finish browsing the Site, you may delete cookies from your system if you wish.

### ***Information from Third Parties***

A Company may request that PwC assist them in collecting, from publicly accessible data sources, personal information about the third parties with whom the relevant Company has a relationship. As noted above, PwC processes such information under the direction of the relevant Company, and has no ownership of such information. PwC also is not responsible for how the relevant Company uses such information. Companies are responsible for complying with any regulations or laws that require providing notice, disclosure, and/or obtaining consent prior to the collection and processing of such information.

### ***Information Use***

Each Company using Third Party Tracker is responsible for the management of their survey data and other information collected about third parties in accordance with their privacy policies. PwC's use of such information is limited to the purpose of providing the service for which the Company has engaged PwC. Specifically, PwC may use such information for the following purposes:

- To create an account for users to enable them to access and use Third Party Tracker;
- To operate, administer, manage and improve Third Party Tracker and the user experience and to communicate with users as needed regarding the same;
- To monitor activity on Third Party Tracker for security-related purposes and to check compliance with applicable obligations, laws, professional standards and PwC policies and guidance;
- To conduct data analysis, including with regard to the performance and use of Third Party Tracker for use by PwC;
- To conduct quality and risk management reviews;
- To carry out our legal and contractual obligations, enforce our rights, or as otherwise permitted by the contract between PwC and the relevant Company;
- To protect against fraud; and
- To notify users when updates are available.

PwC may also use personal information of Company users to communicate with such users and to develop and manage our business, services and relationship with Company users, including by providing information that may be of interest to them. If Company users do not want us to use the information we collect about them through their use of the Application to provide them with information about our services, they can opt out of receiving these communications by following the unsubscribe instructions at the end of the email or contacting [US\\_Third-Party-Tracker-Admin@pwc.com](mailto:US_Third-Party-Tracker-Admin@pwc.com).

Third Party Tracker does not intend to collect or compile personal information for dissemination or sale to outside parties for consumer marketing purposes, or host mailings on behalf of third parties.

### ***Information Sharing***

We are part of a global network of firms. In common with other professional service providers, PwC may transfer or disclose the information it collects, including your information, to third party contractors, subcontractors, subsidiaries, affiliates and/or other PwC firms for the purposes for which you have submitted the information and for the administration of our system or Site and/or other internal, administrative purposes. We transfer your information to third party service providers of identity management, website hosting and management, data analysis, data back up security, and storage services. PwC also shares information stored in Third Party Tracker about users and third parties associated with a Company with such Company in accordance with our contract with such Company.

PwC may disclose information to third parties under the following circumstances:

- As required by applicable law, statute, rule, regulation or professional standard, or through subpoena, search warrant or other legal process;
- For regulatory compliance purposes;
- When explicitly requested by a Company user;
- As necessary in connection with a corporate reorganization, merger, sale, joint venture or other disposition of all or any portion of our business, assets or capital

PwC does not sell personal information collected in connection with the Site.

### ***Information Transfer***

Your information may be transferred outside of the U.S. or your country of residence. This includes countries outside the European Economic Area (“EEA”) and to countries that do not have laws that provide the same degree of protection for personal information. In accordance with applicable legal requirements, we take appropriate measures to facilitate adequate protection for any information so transferred.

Where we transfer personal information outside of the EEA to a country or framework not determined by the European Commission as providing an adequate level of protection for personal information, the transfers will be under an agreement which covers European Union requirements for such transfers, such as standard contractual clauses. The European Commission approved standard contractual clauses are available [here](#).

Although not currently relied upon as an authorized mechanism for cross border transfers, PricewaterhouseCoopers LLP and its affiliated U.S. subsidiaries also adhere to the privacy principles in the EU - U.S. Privacy Shield Framework and the Swiss - U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce. To learn more, see our [Privacy Shield Policy](#).

### ***Third Party Sites***

Third Party Tracker may link to other websites which do not operate under PwC's privacy practices. When you link to other websites, PwC's privacy practices no longer apply. We encourage visitors to review each site's privacy policy before disclosing any personal information.

### ***Your Choices***

#### ***Unsubscribe***

Should you wish to unsubscribe from our mailing list or any registrations, we will provide instructions within the appropriate area of the Site or in communications to you; or you may contact us at: [US\\_Third-Party-Tracker-Admin@pwc.com](mailto:US_Third-Party-Tracker-Admin@pwc.com).

#### ***Managing Cookies***

If you are concerned about cookies, most browsers permit individuals to decline cookies. In most cases, you may refuse or delete one or more cookies and still access Third Party Tracker, but Site functionality may be impaired. After you finish using the Site, you may delete Third Party Tracker cookies from your system if you wish.

#### ***Do Not Track***

Do Not Track ("DNT") is a privacy preference that you can set in your web browser to send a message to the website operator requesting not to be tracked. Currently, we do not respond to these DNT signals. For more information about DNT, visit <https://allaboutdnt.com/>.

#### ***Updates***

If you would like to update your information or request to have outdated information removed, please contact us at: [US\\_Third-Party-Tracker-Admin@pwc.com](mailto:US_Third-Party-Tracker-Admin@pwc.com).

#### ***Rights***

Depending on the jurisdiction in which you are located, you may have certain rights with respect to your personal information. Subject to applicable law, these rights may include:

- the right to know what personal information about you we have collected, disclosed, and/or sold, as applicable;
- the right to obtain a copy of your personal information;
- the right to have your personal information deleted;
- the right to direct us not to sell your personal information (but as noted above, we do not sell personal information collected about you in connection with the Site);
- the right to rectify or update your personal information;
- the right to restrict the processing of your personal information;

- the right to object to the processing of your personal information;
- the right to withdraw your consent for processing (where processing is based on your consent). Please note that if you withdraw your consent, we may not be able to provide you the services for which it was necessary to process your information based on your consent; and
- the right to exercise your privacy rights without discriminatory treatment from us.

To exercise any of the rights described above, please submit a verifiable request to us by either using our [request form](#) or calling us at 1-888-438-4427.

The verifiable request must describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it, and provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative. Please, however, refrain from sending us sensitive personal information.

Where permitted by law, you may use an authorized agent to submit a request on your behalf if you have provided the authorized agent written and signed permission to do so. We may not be able to fulfill your request if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable request does not require you to create an account with us. We will only use personal information provided in a verifiable request to verify the requestor's identity or authority to make the request.

We will respond to your request within a reasonable timeframe in accordance with applicable law. We reserve the right to charge an appropriate fee for complying with a request where permitted by applicable law, and to deny a request where it may be manifestly unfounded, excessive, or unwarranted under applicable law.

We hope that you won't ever need to, but if you do want to complain about our use of personal information, please send us a message with the details of your complaint using our [general contact form](#). You may also contact our EU Representative, PwC Malta, by completing our [EU Representative contact form](#). Applicable laws may also give you the right to lodge a complaint with the data protection authority in your country.

### ***Information Retention***

We will retain the personal information collected by us through Third Party Tracker for as long as is necessary for the purpose(s) for which it was collected as set out in this Privacy Statement, provided that personal information may be held for longer periods where extended retention periods are required by law, regulation and/or professional standards, and in order to establish, exercise or defend our legal rights.

### ***Children***

PwC understands the importance of protecting children's privacy, especially in an online environment. The Site is not intentionally designed for or directed at children under the age of 13 and we do not knowingly collect or maintain personal information from children under the age of 13.

## ***Security***

PwC has implemented generally accepted standards of technology and operational security designed to protect personal information from unauthorized access, loss, misuse, alteration, or destruction. Only authorized PwC personnel and the third parties described in this privacy statement are provided access to personal information and these employees and third parties have agreed to maintain the confidentiality of this information.

## ***Modifications***

PwC may update this statement at any time by publishing an updated version here. You can access the most current version of this privacy statement at any time on this Site.

## ***Contact Us***

If you have questions about this Privacy Statement or about our privacy practices, please contact us at [US\\_Third-Party-Tracker-Admin@pwc.com](mailto:US_Third-Party-Tracker-Admin@pwc.com).