



excelerateds2p Privacy Statement

Status FINAL
Issue Date 14 AUG 2022

Partners



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1 Introduction

excelerateds2p is strongly committed to protecting personal data. This privacy statement describes why and how we collect and use personal data and provides information about individuals' rights. It applies to personal data provided to us, both by individuals themselves or by others. We may use personal data provided to us for any of the purposes described in this privacy statement or as otherwise stated at the point of collection.

"excelerateds2p" (and "we," "us," or "our") refers to the company excelerateds2p,

Personal data is any information relating to an identified or identifiable living person. When "you" or "your" are used in this statement, we are referring to the relevant individual who is the subject of the personal data. excelerateds2p processes personal data for numerous purposes, and the means of collection, lawful basis of processing, use, disclosure, and retention periods for each purpose may differ.

2 Security

We take the security of all the data we hold very seriously. We adhere to internationally recognised security standards and our Information Security Management System relating to client confidential data is independently certified as complying with the requirements of ISO/IEC 27001: 2013. We have a framework of policies, procedures and training in place covering data protection, confidentiality and security and regularly review the appropriateness of the measures we have in place to keep the data we hold secure.

3 Business Contacts

excelerateds2p processes personal data about individuals with whom we come into contact in the course of our business activities. These business contacts include existing and potential private clients, business relationship partners, employees, officers and directors, or other representatives and contacts at corporate clients, legal and business advisers, suppliers, and other third parties and intermediaries excelerateds2p interacts with in the course of business.

excelerateds2p may collect business contacts' details directly from the individuals themselves or the organization they work for or represent. Alternatively, we may obtain this information indirectly from publicly available sources, including social media sites and/or third parties such as companies operating public relations or business development databases. excelerateds2p collects details including name, contact details (such as email address, phone number, and address), and other information (such as job title, employer/organization associated with, and areas of business interest).

excelerateds2p processes personal data about its business contacts using a customer relationship management system (the "excelerateds2p CRM"). In addition to the above, the excelerateds2p CRM may collect data from excelerateds2p email and calendar systems (names, date, and time) in respect of interactions between excelerateds2p users and others.

3.1 Use of Personal Data

Personal data relating to business contacts is used for excelerateds2p's legitimate interests for the following purposes:

3.1.1 Administering, managing and developing our businesses and services

We process personal data in order to run our business, including:

- managing and improving our relationship with clients;
- developing and promoting our businesses, products and services (including identifying client requirements and improvements in service offerings and delivery);
- performing analytics for reporting and statistical purposes,
- using and maintaining IT systems, and protecting the security of these;
- hosting or facilitating the hosting of events and meetings; and
- administering and managing our website, systems and applications, and protecting the security of these.

3.1.2 Conducting corporate research and market analytics

We use business contacts' information to conduct surveys or other forms of market research, and to carry out market analytics and profiling, in order to develop and offer our products and services.

3.1.3 Providing information about us and our professional services

We process business contact details to inform our clients and relevant others about our professional services.

3.2 Data Retention

Personal data of business contacts will be retained in line with our retention policy.

Personal data may be held for longer periods where extended retention periods are required by law or regulation, and/or where this may be needed to establish, exercise or defend our legal rights.

3.3 When and how we share personal data and locations of processing

The excelerateds2p CRM is provided by Salesforce and is hosted in Salesforce's European data centres.

Where we have entered into a business relationship, a collaboration agreement or joint marketing venture, we will share your personal data with the associated organisation to provide a service.

4 Corporate Clients (and individuals associated with our corporate clients)

Our policy is to collect only the personal data necessary for agreed purposes. We ask our clients to only share personal data with us where it is strictly needed for those purposes.

Where we need to process personal data to provide professional services, we ask our clients to provide the necessary information to the data subjects regarding its use. Our clients may use relevant sections of this privacy statement or refer data subjects to this privacy statement if they consider it appropriate to do so.

The categories of personal data processed by us in relation to the services we provide are:

- Personal details (name, country of residence);
- Contact details (email address, contact number, postal address);
- Job details (role)

4.1 Use of Personal Data

We process personal data for the following purposes:

4.1.1 Administering, managing and developing our businesses and services

We may process personal data in order to run our business, including:

- managing our relationship with clients and prospective clients;
- developing our businesses and services (such as identifying client needs and improvements in service delivery);
- maintaining and using IT systems;
- hosting or facilitating the hosting of events; and
- administering and managing our website and systems and applications.
- Performing analytics for reporting and statistical purposes

Legal grounds: Legitimate interests

This processing is necessary for the purposes of the legitimate interests pursued by us to administer, manage and develop our business and services.

4.1.2 Security, quality and risk management activities

We have security measures in place to protect our and our clients' information (including personal data), which involve detecting, investigating and resolving security threats. Personal data may be processed as part of the security monitoring that we undertake; for example, automated scans to identify harmful emails.

We monitor the services provided to clients for quality assurance purposes, which may involve processing personal data stored on the relevant client file.

We collect and hold personal data as part of our client engagement and acceptance procedures. We carry out searches using publicly available sources (such as internet searches and checking against sanctions lists) to identify politically exposed persons and heightened risk individuals and organisations, and to check that we are not prohibited from providing our services (for example due to sanctions, criminal convictions (including in respect of company directors), conduct or other reputational issues).

Legal grounds: Legitimate interests

This processing is necessary for the purposes of our legitimate interests in ensuring network and information security, managing risks to our business and checking the quality of our services.

4.1.3 Providing our clients and prospective clients with information about us and our professional services

- Business contact details to inform our clients and relevant others about our professional services

Legal grounds: Legitimate interests

This processing is necessary for the purposes of our legitimate interests promoting and growing our business and our range of professional services.

4.2 Data Retention

We retain the personal data processed by us for as long as is considered necessary for the purpose for which it was collected (including as required by applicable law or regulation).

In the absence of specific legal, regulatory or contractual requirements, our standard retention period is 6 years.

Personal data may be held for longer periods where extended retention periods are required by law or regulation and/or where this may be needed to establish, exercise or defend our legal rights.

5 Individuals whose personal data we obtain in connection with providing services to our clients

Our policy is to collect only the personal data necessary for agreed purposes and we ask our clients only to share personal data with us where it is strictly needed for those purposes.

Where we need to process personal data to provide our services, we ask our clients to provide the necessary information to the data subjects concerned regarding its use.

We collect and use contact details for our clients in order to manage and maintain our relationship with those individuals. Please see the Business contacts section of this privacy statement for more information about our processing of this type of data.

Given the diversity of the services we provide to clients, we may process the following categories of personal data, including:

- Personal details (e.g. name, country of residence);
- Contact details (e.g. email address, contact number, postal address);
- Job details (e.g. role)

5.1 Use of personal data

We use personal data for the following purposes:

5.1.1 Providing professional services

Some of our services may require us to process personal data in order to provide advice and deliverables

Legal grounds: Legitimate interests, legal obligation, public interest or consent

This processing of personal data by us is necessary for the purposes of the legitimate interests pursued by us in providing professional services and our client in receiving professional services as part of running their organisation and, in some cases, we have a legal obligation to provide the services in a certain way (e.g. statutory audit). Where we process special categories of personal data, we rely on a relevant public interest condition or consent.

5.1.2 Administering, managing and developing our businesses and services

We may process personal data in order to run our business, including:

- managing our relationship with clients;
- developing our businesses and services (such as identifying client needs and improvements in service delivery);
- maintaining and using IT systems;
- hosting or facilitating the hosting of events; and
- administering and managing our website and systems and applications.

Legal grounds: Legitimate interests

This processing is necessary for the purposes of the legitimate interests pursued by us to administer, manage and develop our business and services.

5.1.3 Security, quality and risk management activities

We have security measures in place to protect our and our clients' information (including personal data), which involve detecting, investigating and resolving security threats. Personal data may be processed as part of the security monitoring that we undertake; for example, automated scans to identify harmful emails. We monitor the services provided to clients for quality purposes, which may involve processing personal data stored on the relevant client file. We have policies and procedures in place to monitor the quality of our services and manage risks in relation to client engagements. We collect and hold personal data as part of our client engagement and acceptance procedures. As part of our client and engagement acceptance, we carry out searches using publicly available sources (such as internet searches and sanctions lists) to identify politically exposed persons and heightened risk individuals and organisations and check that there are no issues that would prevent us from working with a particular client (such as sanctions, criminal convictions (including in respect of company directors), conduct or other reputational issues).

Legal grounds: Legitimate interests

This processing is necessary for the purposes of the legitimate interests pursued by us to ensure network and information security, manage risks to our business and check the quality of our services.

5.1.4 Complying with any requirement of law, regulation or a professional body of which we are a member

As with any provider of professional services, we are subject to legal, regulatory and professional obligations. We need to keep certain records to demonstrate that our services are provided in compliance with those obligations and those records may contain personal data.

Legal grounds: Legal obligation or legitimate interests

This processing is necessary for us to comply with a legal obligation; for example, when conducting customer due diligence checks to comply with anti-money laundering regulations and, where we do not have a legal obligation, we have a

legitimate interest in processing personal data as necessary to meet our regulatory or professional obligations.

5.2 Data retention

We retain the personal data processed by us for as long as is considered necessary for the purpose for which it was collected (including as required by applicable law or regulation).

In the absence of specific legal, regulatory or contractual requirements, our baseline retention period for records and other documentary evidence created in the provision of services is 7 years.

Personal data may be held for longer periods where extended retention periods are required by law or regulation and in order to establish, exercise or defend our legal rights.

6 Recruitment Services

In connection with your application for work with us, we may collect, store, and use the following categories of personal information about you:

Categories of personal data	Where we collect this from
Personal details including name, address, telephone number, email address, date of birth, gender, employment history and qualifications.	From you (or the recruitment agency who introduces you to us) in your application form, curriculum vitae and covering letter, or during an interview. Third parties who provide references about you, including your current and former employers.
Sensitive personal data including race or ethnicity, religious beliefs, sexual orientation, or information about your health, including any medical condition.	From you (or the recruitment agency who introduces you to us) in your application form, curriculum vitae and covering letter, or during an interview, if you choose to provide this information to us.
Information about any criminal convictions or offences.	From you and/or third party agencies who carry out pre-employment checks on our behalf.
Evidence of your right to work in the UK, which may include your passport details or work visa details.	From you and/or third party agencies who carry out pre-employment checks on our behalf.

6.1 Use of Personal Data

Your personal data will be used for the following purposes:

- To attract talent and market opportunities at excelerateds2p including by arranging, hosting and participating in events, marketing and advertising our job opportunities, and using recruiters to help find talent for us.
- To identify and source talent including by searching our existing talent pool and publicly available sources (such as social media and job websites of which you are a member).
- To process and manage applications for roles at excelerateds2p, and evaluate you for open positions that match your interests and experience.
- To manage your candidate profile, send you email notifications and other announcements, request additional information or otherwise contact you about your application.
- To screen and select talent by evaluating your suitability for employment with excelerateds2p, including through face-to-face interviews, video interviews, and online and video assessments, and conducting appropriate background checks.
- To hire and onboard talent by making offers of employment and carrying out pre-employment screening checks (which vary from role to role).
- To conduct statistical analyses and create internal reports, for example regarding usage of our careers websites, demographic analysis of candidates, on our recruitment activities, and analysis of candidate sourcing channels.
- To administer and manage our careers websites, and other recruitment tools and solutions.
- To communicate with you about careers at excelerateds2p.
- To make reasonable adjustments to our selection processes (including using health and other special category data as outlined below).
- Any other purposes stated when you provide your personal data information to us.
- To send you, by email or post, welcome information or items once an offer is made.

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

Legal grounds: Legitimate interests

This processing is necessary for the purposes of the legitimate interests to manage our recruitment process, including to assess and confirm suitability for employment.

Substantial public interest

This processing is necessary for the purposes of the legitimate interests to manage our recruitment process, including to assess and confirm suitability for employment.

We collect and use information about race, ethnicity and health data for the following purposes:

- For reasons of substantial public interest, including to identify or keep under review the existence or absence of equality of opportunity or treatment.
- For carrying out our obligations and exercising our specific rights under employment, social security and social protection law and for health and social care purposes, including to comply with our legal obligation to make reasonable adjustments (for example, as a result of the outcome of a pre-employment medical assessment).
- If necessary, for the establishment, exercise and defence of legal claims.

We carry out criminal records checks for the following purposes:

- To comply with our legal obligations to ensure an individual is eligible to work in the UK and to report relevant information to the Home Office as part of PwC sponsored visa applications.
- For our legitimate interest or that of a third party to carry out pre-employment screening including a full background and criminal records check, depending on the role: (i) to establish whether an applicant has committed an unlawful act or been involved in dishonesty, malpractice or other seriously improper conduct; or (ii) to comply with government and public sector clearance requirements.

It is in our legitimate interests to decide whether to appoint you to the role you are applying for since it would be beneficial to our business to appoint someone that is suitable for that role.

We also need to process your personal information to decide whether to enter into a contract with you.

6.2 Automated Decision Making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

6.3 Data Retention

We will retain your personal information for a period of two years after you have submitted your application. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with applicable laws and regulations.

If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will

write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

7 Suppliers (including subcontractors and individuals associated with our suppliers and subcontractors)

We collect and process personal data about our suppliers (including subcontractors and individuals associated with our suppliers and subcontractors) in order to manage the relationship, contract, to receive services from our suppliers and, where relevant, to provide professional services to our clients. The personal data is generally business card data and will include name, employer name, phone, email and other business contact details and the communications with us.

7.1 Use of Personal Data

We use personal data for the following purposes:

7.1.1 Receiving services

We process personal data in relation to our suppliers and their staff as necessary to receive the services. For example, where a supplier is providing us with facilities management or other outsourced services, we will process personal data about those individuals that are providing services to us.

Legal grounds: Legitimate interests

This processing of personal data by us is necessary for the purposes of the legitimate interests pursued by us in receiving services.

7.1.2 Providing professional services to clients

Where a supplier is helping us to deliver professional services to our clients, we process personal data about the individuals involved in providing the services in order to administer and manage our relationship with the supplier and the relevant individuals and to provide such services to our clients (for example, where our supplier is providing people to work with us as part of a PwC team providing professional services to our clients).

Legal grounds: Legitimate interests

This processing of personal data by us is necessary for the purposes of the legitimate interests pursued by us in providing professional services and our client in receiving professional services as part of running their organisation.

7.1.3 Administering, managing and developing our businesses and services

We may process personal data in order to run our business, including:

- managing our relationship with suppliers;

- developing our businesses and services (such as identifying client needs and improvements in service delivery);
- maintaining and using IT systems;
- hosting or facilitating the hosting of events; and
- administering and managing our website and systems and applications.

Legal grounds: Legitimate interests

This processing is necessary for the purposes of the legitimate interests pursued by us to administer, manage and develop our business and services.

7.1.4 Security, quality and risk management activities

We have security measures in place to protect our and our clients' information (including personal data), which involve detecting, investigating and resolving security threats. Personal data may be processed as part of the security monitoring that we undertake; for example, automated scans to identify harmful emails. We have policies and procedures in place to monitor the quality of our services and manage risks in relation to our suppliers. We collect and hold personal data as part of our supplier contracting procedures. We monitor the services provided for quality purposes, which may involve processing personal data.

Legal grounds: Legitimate interests

This processing is necessary for the purposes of the legitimate interests pursued by us to ensure network and information security, manage risks to our business and check the quality of the services.

7.1.5 Providing information about us and our range of services

Unless we are asked not to, we use business contact details to provide information that we think will be of interest about us and our services. For example, industry updates and insights, other services that may be relevant and invites to events.

Legal grounds: Legitimate interests

This processing is necessary for the purposes of the legitimate interests pursued by us to promote our business and services.

7.1.6 Complying with any requirement of law, regulation or a professional body of which we are a member

As with any provider of professional services, we are subject to legal, regulatory and professional obligations. We need to keep certain records to demonstrate that our services are provided in compliance with those obligations and those records may contain personal data.

Legal grounds: Legal obligation or legitimate interests

This processing is necessary for us to comply with a legal obligation; for example, when conducting supplier due diligence checks and, where we do not have a legal

obligation, we have a legitimate interest in processing personal data as necessary to meet our regulatory or professional obligations.

7.2 Data Retention

We retain the personal data processed by us for as long as is considered necessary for the purpose for which it was collected (including as required by applicable law or regulation). Personal data will be retained about our contacts at our suppliers for as long as it is necessary for the purposes set out above (e.g. for as long as we have, or need to keep a record of, a relationship with a contact, which is for the duration of our relationship with a contact or their organisation) and then deleted in line with our deletion and retention policies.

Personal data may be held for longer periods where extended retention periods are required by law or regulation and in order to establish, exercise or defend our legal rights.

8 Visitors to our website

Visitors to our websites are generally in control of the personal data shared with us. We may capture limited personal data automatically via the use of cookies and analytics tools on our website. Please see the section on Cookies below for more information.

We receive personal data, such as name, title, company address, email address, and telephone numbers from website visitors; for example when an individual registers updates from us.

Visitors are also able to send an email to us through the website. Their messages will contain the user's screen name and email address, as well as any additional information the user may wish to include in the message.

We ask that you do not provide special categories of personal data (such as race or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; physical or mental health; genetic data; biometric data; sexual life or sexual orientation; and, criminal records) to us when using our website.

8.1 Use of Personal Data

When you provide personal data to us, we may use it for any of the purposes described in this privacy statement or as stated at the point of collection (or as obvious from the context of collection), including:

- where you submit your contact details, unless we are asked not to, we may contact you with information about excelerateds2p's business, services and events, and other information which may be of interest to you. Should visitors subsequently choose to unsubscribe from mailing lists or any registrations, we will provide instructions on the appropriate webpage, in our communication to the individual.

- to communicate with you in order to distribute requested materials or ask for further information;
- to determine the company, organisation, institution, or agency that you work for or with which you are otherwise associated;
- to develop our businesses and services, including aggregating data for website analytics and improvements;
- to understand how people use the features and functions of our websites in order to improve the user experience;
- to monitor and enforce compliance with our terms, including acceptable use policies; and
- any other purposes for which you provided the information to excelerateds2p (such as to subscribe you to the updates you request).

Our websites do not collect or compile personally identifying information for sale to external parties for their marketing purposes.

8.2 Cookies

We use small text files called 'cookies' which are placed on your hard drives to assist in personalising and enriching your browsing experience by displaying content that is more likely to be relevant and of interest to you. The use of cookies is now standard operating procedure for most websites. However if you are uncomfortable with the use of cookies, most browsers now permit users to opt-out of receiving them. You need to accept cookies in order register on our website. You may find other functionality in the website impaired if you disable cookies. After termination of the visit to our site, you can always delete the cookie from your system if you wish.

8.3 Third Party Links

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement.

8.4 Data Retention

Personal data collected via our websites will be retained by us for as long as it is necessary (e.g. for as long as we have a relationship with the relevant individual).

9 Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact info@excelerateds2p.com.

10 Data Protection Officer

We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact info@excelerateds2p.com. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO) who is responsible for data protection issues in the UK. If you are based outside the UK, you have the right to lodge your complaint with the relevant data protection regulator in your country of residence.