

## Data Privacy Statement

Last updated: February 2023

Privacy Notice – SAP SuccessFactors Recruiting

### 1. Introduction

This Privacy Notice is intended to describe the practices EY follows in relation to the SAP SF Recruiting (“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:

- For the personal data of EY personnel: The data controller is the EY entity which employs you.
- For the personal data of third-party personnel (including EY clients): The data controller is the EY local member firm with which the third party has a relationship.

You can find a list of local EY member firms and affiliates on the [ey.com Privacy Statement](#).

The personal data in the Tool is shared by the above data controller with one or more member firms of EYG (see “Who can access your personal data” section 6 below).

The Tool is hosted on servers externally by SAP Success Factors, which is hosted in data centers in St. Leon Rot, Germany and Amsterdam, the Netherlands.

### 3. How does the tool process personal data?

The Tool will be EY’s Applicant Tracking System and support EY’s recruitment process including sourcing, recruiting, selecting and hiring new employees and contractors. The SAP Offer Tool is integrated with SAP AF Recruiting where SF Recruiting will receive offer letter information consisting of offer letter approvers, offer letter status updates, identification numbers and signed offer letters.

Your personal data processed in the Tool is used to source, assess, select, and hire employees for EY job openings.

EY relies on the following basis to legitimize the processing of your personal data in the Tool:

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 legitimate interests in ensuring the success of our recruitment practices, including sourcing, recruiting, selection and hiring of new employees.

You 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:

- EY Partners / Employees / Contractors: Basic user contact and organizational data from SuccessFactors Core HR (EC). As part of the recruiting process, for these individuals to be considered internal candidates, mobility preferences, and personal contact information is included
- External Candidates: Basic candidate profile information including First name, Last name, basic contact information, and resume/CV, work experience, languages spoken, geographic preferences
- Applicants: Information required to consider the candidate an applicant for a specific requisition including candidate profile information above plus interview information, assessment information, and offer details. Other data elements collected based on country specific regulatory or operational requirements.
- Agency representative contact information: First name, Last name and email address, name of agency

This data is sourced:

- Directly by EY partners, employees or contractors
- From a feed from other EY systems (SuccessFactors / Employee Central; Yello)
- From the candidate or applicant themselves
- From third parties in connection with your application such as referees, recruiters, organizations that provide background checks and assessment results (e.g. CappFinity, Saville, Pymetrics, HireVue, RAI)
- Information is sourced from SAP Offer Tool where SF Recruiting will receive information on offer letters consisting of offer letter approvers, offer letter status updates, identification numbers and signed offer letters.

## 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 and government identifiers such as passport numbers, visa details and national ID numbers.

Sensitive personal data is collected on a country basis in the applications and / or Offer as requested by the country based on regulatory or operational needs. For example, the Tool may collect sensitive personal data such as race and sexual orientation for equal opportunities and diversity monitoring purposes.

## 6. Who can access your personal data?

Your personal data is accessed in the Tool by the following persons/teams:

- EY Employees, Partners, and Contractors
- EY Hiring Managers
- Recruiters
- Recruiting Talent Shared Services and Recruiting Coordinators
- Sourcing Recruiters
- Recruiting Leads
- Global System Support
- Global Reporting

- Candidates / Applicants
- Staffing Agency representatives
- SAP Support staff
- Tata Consulting Services (TCS)
- IBM IT Support Team

USER GROUP	LOCATION	PURPOSE	ACCESS	AMOUNT
EY Employees, Partners, and Contractors	Global	May refer other individuals for jobs. May apply as candidate for positions. May serve as adhoc approvers.	Will have write access with the ability to create a job requisition to be approved. Will have write access with ability to apply to EY positions as internal candidates. Will have write ability to add referrals. Will have ability to approve requisitions that are sent to them.	300,000
EY Hiring Managers	Global	The individual(s) from the business that will ultimately manage this role and will make hiring decision.	Will have access to see job requisition, review applicants and approve offers for the job requisitions that they are listed as hiring manager on.	100,000
Recruiters	Global	The individuals responsible for managing the overall sourcing, recruiting, selection and hiring process.	Will have access to job requisition, candidates, applicants and offer information for the jobs they are recruiting for.	1800
Recruiting Talent Shared Services and Recruiting Coordinators	Global	To support the recruiting process are given the Talent Transactional (TT) and/or Admin Hub roles	Will have access to job requisition, candidates, applicants and offer information for the job requisitions that they are supporting.	2500
Sourcing Recruiters	Global	Provide sourcing/recruiting support (ex. identifying potential candidates/applicants for various roles, interview support)	Will have access to job requisition, candidates, applicants and offer information for jobs requisitions that they are supporting.	350
Recruiting Leads	Global	Provide oversight and leadership for recruiting team. Will have reporting role.	Will have access to job requisition and candidate reports for the managerial regions they oversee.	500
Global System Support	Canada, India, New Zealand, US, Poland	Granted to a limited number of individuals at EY to oversee and manage the tool at a	Has overall access to system data and functionality required for system support	9

		global level including overseeing SuccessFactors Recruiting support and release activities.		
Global Reporting	US, Poland, India	Provides global reporting support. To create and manage reports across all data.	Has read only access required for report creation globally. Has permission to create and run reports.	8
Candidates / Applicants	Global	To allow individuals to express interest in EY and apply for any open jobs.	Has access to their own personal data. Has access to create, edit and delete data on their candidate profile. Has access to apply for any posted EY jobs.	Unknown
Staffing Agency representatives	Global	Has access to add candidates that they are referring as an agency	Has access to add candidates that they are referring as an agency	500
SAP Support staff	EU	IT Support	Has access to system data and functionality required for system support	3 to 5
Tata Consulting Services (TCS)	Mexico and India	To provide system support	Has read/write/edit/delete access to all personal data in the Tool. Has access to a range of capabilities within the Admin Center.	
IBM IT Support Team	Multiple (Canada, China, Czech Republic, Hungary, India, Malaysia, Mexico, Oceania, Philippines, Poland, UK, the US, Costa Rica and Australia)	To provide IT support Services including the Digital Talent System Support Services to level 2 and 3 operational and release management.	Has read/write/edit/delete access to all personal data in the Tool. Has access to a range of capabilities within the Admin Center.	The access to this tool will be given based on need and role. For Level 2 and Level 3 support, access will be provided to 40 (approx.) IBM IT support team members.

The access rights detailed above involves transferring personal data in various jurisdictions (including jurisdictions outside the European Union) in which EY operates (EY office locations are listed at [https://www.ey.com/en\\_gl/locations](https://www.ey.com/en_gl/locations)). An overview of EY network entities providing services to external clients is accessible [here](#) (See Section 2 (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](#).

We 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 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 SAP Success Factors, recruiters and agencies and Tata Consulting Services (TCS) and IBM, are governed by agreements which includes standard data protection clauses adopted by the European Commission.

## 7. Data retention

Our policy is to retain personal data only for as long as it is needed for the purposes described in the section “How does the Tool process 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:

- If you are an EY user of the Tool: in accordance with the EY Records Retention Global Policy and the relevant Country Retention Schedule. The retention period is triggered based on the last activity date.
- If you are an external candidate / applicant or otherwise not an EY user of the Tool: your data will be held in line with your country retention regulations. The retention period is triggered based on the last activity date.

After the end of the data retention period, your personal data will be deleted.

## 8. 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 [ey-protecting-your-data-2018.pdf](#) brochure.

## 9. Controlling your personal data

EY will not transfer your personal data to third parties (other than any external parties referred to in section 6 above) unless we have your permission or are required by law to do so.

## 10. Your rights in relation to your personal data

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

- 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](mailto:global.data.protection@ey.com).

## 11. 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](mailto: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 may have the right to complain to your country’s data protection authority. You may also have the right to refer the matter to a court of competent jurisdiction.

Certain EY member firms in countries outside the European Union (EU) and the UK have appointed representatives in the EU and the UK respectively to act on their behalf if, and when, they undertake data processing activities to which the EU General Data Protection Regulation (GDPR) and/or the UK General Data Protection Regulation (UK GDPR) applies. Further information and the contact details of these representatives are available below:

[EU data protection representative | EY](#)

[UK Data protection representative \(ey.com\)](#)

## 12. Contact us

If you have additional questions or concerns, contact your usual EY representative or email [global.data.protection@ey.com](mailto:global.data.protection@ey.com).