

# Privacy Statement

KPMG LTD (“KPMG”) is dedicated to protecting the confidentiality and privacy of information entrusted to it. As part of this fundamental obligation, KPMG is committed to the appropriate protection and use of personal information (sometimes referred to as “Personal Data”) that we collect about you.

Please review this privacy statement (“Privacy Statement”) to learn more about how we collect, use, share and protect the personal information that we have obtained.

## 1. Collection and use of personal information

### What information we collect

We obtain your personal information through our registration form for the purpose of facilitating your registration in any of the trainings held by KPMG Academy, issue your certificate and invite you to any other future training event, if we receive your consent. Depending on the training you choose to attend, we collect the following personal information:

#### **Face to face seminars (free or paid):**

We collect personal information such as your name, surname, job title, duties, contact details and bank details (where necessary).

The personal information provided to us by you, will not be used for any other purpose, other than the purposes mentioned above.

#### **Webinars (free or paid):**

We collect personal information such as your name, surname, job title, duties, contact details and bank details (when a fee is charged).

The personal information provided to us by you, will not be used for any other purpose, other than the purposes mentioned above.

#### **Self-taught seminars (free or paid)**

We collect personal information such as your name, surname, job title, duties, contact details and bank details (when a fee is charged).

The personal information provided to us by you, will not be used for any other purpose, other than the purposes mentioned above.

#### **Recorded seminars**

We collect personal information such as your name, surname, job title, duties, contact details and bank details.

The personal information provided to us by you, will not be used for any other purpose, other than the purposes mentioned above.

## The legal grounds we have to use your personal information

KPMG generally collects only the personal information necessary to fulfill the registration process. General Data Protection Regulation allows us to process personal information, so long as we have a legal ground under the law to do so. It also requires us to tell you what those grounds are. As a result, when we process your personal information, we will rely on the following processing condition(s):

- The lawful basis we rely on, for processing your personal data is your consent under article 6(1)(a) of the GDPR
- Performance of a contract: this is when the processing of your personal information is necessary in order to perform our obligations towards you
- Legitimate interests: we will process information about you where it is in our legitimate interest in running a lawful business to do so in order to further that business, so long as it doesn't outweigh your interests.

### **2. Sharing and transfer of Personal Data**

We do not share personal information with third parties, except as necessary for our legitimate professional and business needs to carry out your requests and/or as required or permitted by law or professional standards. This includes:

- Audits: disclosures of personal information may also be needed for data privacy or security audits and/or to investigate or respond to a complaint or a security threat
- KPMG will disclose personal information to the Human Resource Development Authority of Cyprus (HRDA) in order to receive any subsidy offered, when applicable.

### **3. Your rights**

When KPMG processes personal information about you, you have the following rights:

- Access and correction: you have the right to access that data. This is sometimes called a 'Subject Access Request'. If we agree that we are obliged to provide personal information to you, we will provide it to you free of charge. Before providing personal information to you, we may ask for proof of identity and sufficient information about your interactions with us in order to locate your personal information. If the information we hold about you is incorrect, you are entitled to ask us to correct any inaccuracies in the personal information.
- Object to processing: you have the right to object to us processing your personal information if we are not entitled to use it anymore.
- Other Rights: in addition, you may have rights to have your information deleted if we are keeping it too long, restrict its processing in certain circumstances and/or obtain copies of information we hold about you in electronic form.

You can make a request or exercise these rights by contacting KPMG at [DataProtection@kpmg.com.cy](mailto:DataProtection@kpmg.com.cy) and we will make all reasonable and practical efforts to comply with your request, so long as it is consistent with applicable law and professional standards.

### **4. Data security and integrity**

KPMG has reasonable security policies and procedures in place to protect personal information from unauthorized loss, misuse, alteration or destruction. Despite KPMG's best efforts, however, security cannot be absolutely guaranteed against all threats. To the best of our ability, access to your personal information is limited to those who have a need to know. Those individuals who have access to the data are required to maintain the confidentiality of such information.

We also make reasonable efforts to retain personal information only for so long i) as the information is necessary to comply with an individual's request, ii) as necessary to comply with legal, regulatory, internal business or policy requirements, or iii) until that person asks that the information be deleted. The period for which data is retained will depend on the specific nature and circumstances under which the information was collected; however, subject to requirements of i-iii above, personal information will not be retained for more than 4 years.

## **5.Changes to this statement**

KPMG may modify this Privacy Statement from time to time to reflect our current privacy practices. When we make changes to this statement, we will revise the "updated" date at the top of this page.

## **6.Policy questions and enforcement**

KPMG is committed to protecting the privacy of your personal data. If you have questions or comments about our administration of your personal data, please contact us at [DataProtection@kpmg.com.cy](mailto:DataProtection@kpmg.com.cy). You may also use this address to communicate any concerns you may have regarding compliance with our Privacy Statement. If you are not satisfied with the response you receive, you may escalate your concern to the KPMG Cyprus Data Protection Officer (DPO) by sending an email to [christina.hadjistilli@kpmg.com.cy](mailto:christina.hadjistilli@kpmg.com.cy).

We will acknowledge your email within 15 days and seek to resolve your concern within one month of receipt. Where the concern is complex or we have a large volume of concerns, we will notify you that the concern will take longer than one month to resolve and we will seek to resolve your concern within three months of the concern being first raised. We may accept your concern (and in that case implement one of the measures set out in the 'Your Rights' section above), or we may reject your concern on legitimate grounds.

In any event, you always have the right to lodge a complaint with the regulator in charge of protecting personal information, at the Office of the Commissioner for Personal Data Protection.