

# McKinsey & Company “Got a Concern?” Hotline Privacy Notice

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*Effective date February 28, 2019*

This “Got a Concern?” hotline Privacy Notice (“Privacy Notice”) describes how we handle and protect your personal data in connection with McKinsey’s Got a Concern? hotline (the “hotline”). McKinsey & Company Inc., and its subsidiaries and affiliates (“McKinsey”, “us” or “we”), understand that your privacy is important to you. [McKinsey subsidiaries and affiliates](#) may process your personal data in their capacity as data controllers. We are committed to respecting your privacy and protecting your personal data, which is any information that is capable of identifying you as an individual person.

The hotline is a private channel (web and phone-based) that we have deployed to enable our Firm Members to raise concerns that they may have about suspected violations of laws or regulations or company policies related to:

- Financial, accounting, or auditing (e.g., finance and expenses, falsification of contracts, reports or records)
- Corruption (e.g., bribes, kickbacks, illegal or fraudulent conduct)
- Anti-competitive practices (e.g., antitrust activity)
- Discrimination, harassment or retaliation
- Health, hygiene and security in the workplace (e.g., substance abuse, violence or threat to safety)
- Firm values and policies (e.g., Firm and client confidentiality, misuse of intellectual property, assets or services)

If your concern is not included in the categories listed above, we will not be able to address your concern through the hotline. In this event, we would encourage you to use the other reporting channels available to you.

This Privacy Notice only applies to the personal data of Firm Members who raise a concern through the Got a Concern? hotline and the personal data of individuals who are the subject of the concern or whose personal data is otherwise shared in connection with the concern. It does not apply to our contractors or clients, or other personal data that McKinsey collects for other purposes.

Note that depending upon the laws of the country in which you are residing, the concern that you raise may not be able to be made anonymously; however, your personal data will be treated confidentially and will only be disclosed as set out below.

## **Special considerations related to the “Got a Concern?” hotline**

If you believe that you have witnessed a violation of our personal conduct policies, [you can raise a concern](#) by talking to the individuals involved, speaking with your manager, PD, HR representative, cell or department leadership, or even the Chief People Officer. For issues outside of personal conduct, you may also speak to senior leaders for your engagement or CST, a trusted partner or functional leader, or our [Firm’s Legal department or Risk department](#).

If you do not feel comfortable raising a concern directly, you also have the option of utilizing our Got a Concern? hotline to raise your concern. Notwithstanding, your use of this hotline is completely voluntary. The Firm will then look into and address these concerns in the same manner as if the issue had been raised through any of the other reporting channels.

We encourage you to identify yourself when reporting a concern to enhance our ability to gather necessary information related to the concern that you have raised. If you provide your contact information when you raise your concern through the hotline, we may contact you directly about your concerns. Although we do not encourage anonymous reporting because it is not as helpful to the individual who must examine the facts that you have alleged, we will still proceed with the investigation if it is submitted anonymously, provided the country where you are based allows this. To help you maintain your anonymity, you will be given a unique report key and provided with an opportunity to create a password so that you may check on the status of your question or report, to add information to the report, and/or to correspond privately and anonymously with the Firm. At the conclusion of an investigation, we will update you about the status of the investigation.

We will promptly notify any person who is the subject of a concern that has been raised through the hotline except where notice needs to be delayed to ensure the integrity of the investigation and preservation of relevant information.

**If you do not wish to raise a concern in a manner that is subject to the terms set forth herein, we would be unable to accept any of your information through our Got a Concern? hotline. We**

**recommend that you report your concern directly to your manager, PD, HR representative, cell or department leadership. For issues outside of personal conduct, you may also speak to senior leaders for your engagement or CST, a trusted partner or functional leader, our [Firm's Risk department](#), or our [Firm's Legal department](#)**

## **Information we collect**

The Got a Concern? hotline collects the following personal data and information that you provide when you make raise a concern over the hotline: (i) your name and contact details (unless you raise a concern anonymously); (ii) the name and other personal data of the persons you identify in the concern that you have submit over the hotline to the extent that you provide such information; and (iii) a description of the alleged incident that has caused you to raise a concern through the hotline.

## **Use of information and the legal basis by which we process your personal data**

Information submitted over the Got a Concern? hotline is collected by representatives of our service provider, NAVEX Global, who will document the concern and pass it along to the Firm. The Firm will then look into and address these concerns in the same manner as if the issue had been raised through any of the other reporting channels.

McKinsey has a legitimate interest in the processing of this personal data. Upholding our Firm values and professional standards means that we must have ways to discuss and investigate when there are instances of questionable conduct. It is crucial that we make a variety of accessible, appropriate channels available to our Firm Members when they believe an action or event deserves examination.

## **Data recipients and international data transfers**

To process and investigate your concern and subject to the provisions of local law, the personal data you provide through the Got a Concern? hotline may be accessed, processed and used by representatives of the relevant teams within McKinsey, including Human Resources, Finance, Internal Audit, Legal, Firm leadership and our external advisors (e.g., legal advisors).

Personal data collected through the hotline may be transferred from time to time to McKinsey subsidiaries and affiliates and their personnel across our global organization, as well as to our third-party service providers located throughout the world, including in countries where the local law may grant you fewer rights than you have in your own country. Where required by law, we have put in place legal mechanisms designed to ensure adequate data protection of your personal data that is processed by McKinsey subsidiaries, affiliates and third- party service providers, including the transfer of your personal data to countries other than the one in which you reside. If you would like more information about these legal mechanisms, which may include the EU's Standard Contractual Clauses, please contact us at the address below.

We also may share your personal data, in limited circumstances, with technical staff at NAVEX Global.

In addition, we may disclose information about you:

- If we are required to do so by law or legal process;
- To law enforcement authorities or other government officials;
- When we believe disclosure is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity;
- If disclosure is necessary to protect the vital interests of a person;
- To protect our property, services and legal rights;
- To prevent fraud against McKinsey, our subsidiaries, affiliates and/or business partners;
- To support auditing, compliance, and corporate governance functions; or
- To comply with any and all applicable laws.

Notwithstanding the foregoing, McKinsey is committed to protecting your identity and will not disclose it unless we are required by applicable law, due to an investigation resulting in legal proceedings or where there is malicious intent or false testimony submitted.

We maintain processes designed to ensure that any processing of personal data by third party service providers is consistent with this Privacy Notice and protects the confidentiality, availability, and integrity of your personal data.

In addition, we may disclose or transfer the personal data submitted through the Got a Concern? hotline in the event of a re-organization, merger, sale, joint venture, assignment, or other transfer or disposition of all or any portion of our business.

## **Security**

McKinsey has implemented generally accepted standards of technology and operational security to protect personal data from loss, misuse, alteration, or destruction. Only authorized McKinsey personnel and third-party service providers are provided access to personal data, and these employees and service providers are required to treat this information as confidential. Despite these precautions however, McKinsey cannot guarantee that unauthorized persons will not obtain access to your personal data.

## **Data retention**

The personal data you provide will be kept as long as necessary to investigate the concern that you raised through the Got a Concern? hotline, and to pursue any legal proceedings or disciplinary measures arising out of the report. We may also retain personal data for longer than the duration of the investigation should we need to retain it to protect ourselves against legal claims, use it for analysis or historical record-keeping, or comply with our information management policies and schedules. If you request that we delete your personal data and your request is granted, McKinsey will make reasonable attempts to delete all instances of the information in its entirety. For requests for access, corrections, or deletion, please refer to the “Your rights” section of this Privacy Notice.

## **Your rights**

Where granted by local law, the individuals raising a concern through the Got a Concern? hotline and the individuals who are the target of the investigation may have the right to request access to the personal data that we have collected for the purposes of reviewing, modifying, or requesting deletion of the data. These individuals may also have the right to request a copy of the personal data that we have collected and to have any inaccuracies in that data corrected. In certain circumstances, these individuals may also request that we cease processing their personal data.

If you qualify as one of these individuals described above and you would like to make a request to access, review, or correct the personal data we have collected about you, or to discuss how we process

your personal data, please contact us at [Hotline Privacy Notice Questions@McKinsey.com](mailto:Hotline_Privacy_Notice_Questions@McKinsey.com). To help protect your privacy and security, we will take reasonable steps to verify your identity, such as requiring a password and user ID, before granting access to your personal data. We will make reasonable attempts to promptly investigate, comply with, or otherwise respond to your requests as may be required by applicable law. Different laws may prevent us from providing access to your personal data or otherwise fully complying with your request depending upon the circumstances and the request, such as for example, where producing your information may reveal the identity of someone else. We reserve the right to charge an appropriate fee for complying with your request where allowed by applicable law, and/or deny your requests where they may be manifestly unfounded, and/or excessive, or otherwise objectionable or unwarranted under applicable law.

In addition, and where granted by local law, you have the legal right to lodge a complaint with a competent data protection authority.

## **Contact us**

If you have any questions about our Got a Concern? hotline, please contact us at:

[Hotline Privacy Notice Questions@McKinsey.com](mailto:Hotline_Privacy_Notice_Questions@McKinsey.com).

If you have any questions about our Privacy Notice, please contact us at:

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