

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

*Effective date August 1, 2022*

“Got a Concern?” is provided by McKinsey & Company Inc., and its subsidiaries and affiliates (“**McKinsey**”, “**we**”, “**our**”, “**us**”). This website, through which you may raise a concern or ask a question (submit a report), is operated by NAVEX Global, established at 5500 Meadows Road, Suite 500, Lake Oswego, OR, 97035, United States (“**NAVEX**”), McKinsey’s independent service provider of Got a Concern?. The use of Got a Concern? is voluntary.

This Privacy Notice addresses the handling of your personal data by McKinsey in connection with a report you submit via Got a Concern?. We are committed to respecting your privacy and protecting your personal data, whereby privacy rights and practices may vary among the countries in which we operate due to local practices and legal requirements.

We encourage you to identify yourself when raising a concern. We may be able to do a better job of investigating your report if you let us know who you are. Please note that in some countries, applicable law may prohibit anonymous reporting and/or may only allow reports on a defined category of violations. We may need to handle your report accordingly.

## Collection and Use of Personal Data

McKinsey may collect the following information through Got a Concern?: your name and contact details and whether you are employed by McKinsey; the name and other information about individuals that are named in your report; a description of the reported matter in your report including the date and location, as well as other pertinent information; and any questions you may have. McKinsey may also collect other relevant information about you from other sources during any subsequent review/investigation.

We will use your personal data as necessary and appropriate in the context of any review/investigation initiated, or action taken based on your report. We may also use your personal data to follow-up with you in the course of or after the review/investigation as required. The information provided by or about you will always be treated confidentially.

McKinsey may use the information mentioned above because we have to either comply with a legal obligation imposed on McKinsey or we have a legitimate interest to investigate the report that you submitted to us in order to abide by our own high professional standards and/or in line with our aspiration to create a safe work environment for anyone working at or with McKinsey.

## Personal Data Disclosure/Transfer and Retention

McKinsey has contracted with NAVEX to protect the confidentiality and security of your personal data, and NAVEX is only permitted to use your personal data for the provision of Got a Concern?. Information we receive from NAVEX about you and any personal data that you provide to us will be dealt with on a strict “Need-to-Know”-basis.

Where required by law, we will promptly notify any person who is the subject of a report that has been submitted through Got a Concern? except where such notice needs to be delayed to ensure the integrity of the investigation and preservation of relevant information. Where we know your identity, we will seek not to disclose it unless necessary or legally required.

Depending on the nature of the matter, the report and related documentation may need to be communicated to appropriate personnel at McKinsey, such as representatives of Legal, Human Resources, Finance or Audit or our leadership for further investigation and resolution. Where necessary, members of Legal/Human Resources or McKinsey's leadership may need to be informed of any finding of a violation for the purposes of determining any disciplinary action and for transparency purposes. The information may also be shared with McKinsey's external advisers (such as lawyers and/or auditors) and competent authorities (such as regulators and/or police). We may furthermore disclose your personal data, 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; 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.

In this context, personal data may be transferred to countries that have different data protection rules than are found in the country from where you are based, including to other McKinsey affiliates and/or service providers, as required to use our processing capabilities to investigate the report and administer Got a Concern?.

Where legally required, we have put in place adequate measures, such as Standard Contractual Clauses adopted by the European Commission and/or issued by the UK Information Commissioner, to always protect your personal data. If you would like more information about these measures, please contact us at the address below.

Information relating to a report made via Got a Concern? will be retained in accordance with applicable legal requirements and otherwise for as long as necessary for the investigation and any related ongoing or future proceedings in line with internal retention guidelines.

## Security

McKinsey has implemented generally accepted standards of technology and operational security designed to protect personal data from loss, misuse, alteration, or destruction. Only authorized McKinsey personnel and authorized third-party service providers are provided access to personal data as necessary, and these employees and service providers are required to treat this information as confidential.

## Your Privacy Rights

Where granted by applicable law, you may have the right to request access to the personal data that we have collected about you for the purposes of reviewing, modifying, or requesting deletion of the data. You may also have the right to request a copy of the personal data that we have collected about you and to have any inaccuracies in that data corrected. In certain circumstances, you may also request that we cease processing your personal data.

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. 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.

If you would like to make a request to access, review, or correct the personal data we have collected about you, or if you have any questions regarding your privacy and the processing of your personal data, or if you want to connect with any of our Data Protection Officers, please contact us at

McKinsey & Company

Legal Department

711 Third Avenue

New York, NY 10017

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[privacy@mckinsey.com](mailto:privacy@mckinsey.com).

For questions regarding the report you submit via Got a Concern? or the related investigations, please contact [here](#).

## Changes

We will update this notice from time to time. Any changes will be posted on this page with an updated revision date. If we make any material changes that affect your privacy rights, we will provide notice through Got a Concern? or by other means.