



L.E.K. Consulting LLC

L.E.K. Consulting Website Privacy Notice

February 2019



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1. IMPORTANT INFORMATION AND CONTACT DETAILS

L.E.K. Consulting LLC (together with its global associated offices, “L.E.K. Consulting”, “we”, “us” or “our”) respects your privacy and is committed to protecting the personal data of yours that we may hold. This privacy notice applies to the www.lek.com website (the “Website”) and describes the types of personal identifying information we may collect from you when you visit this Website and our practices for collecting, using, maintaining, disclosing and transferring that information. It also informs you of your privacy rights and how the law protects you in certain jurisdictions.

This version of the Privacy Notice was last updated in February 2019. By accessing the Website, you agree to this Privacy Notice. L.E.K. Consulting reserves the right to modify this Privacy Notice at any time and to use user information for new, unanticipated uses not previously disclosed in this Privacy Notice. However, if our information practices change at some time in the future, we will post the policy changes to our Website to notify you of these changes and provide you with the ability to opt out of these new uses. Your continued use of the Website after such changes are made is considered to be your acceptance of those changes. If you are concerned about how your information is used, you should check back at our Website periodically.

This Website is not directed at children 16 years of age or younger. L.E.K. Consulting, therefore, will not intentionally collect information about any user under the age of 16 and our website or communications are not extended to such persons.

Contact:

If you have questions or comments about this Privacy Notice or our privacy practice or any of the other terms set out in notice, please contact us via e-mail at: info@lek.com or at our postal address which is:

L.E.K. Consulting
Attn: Legal
75 State Street, 19th Floor
Boston
MA 02109

If you are a data subject protected by the EU General Data Protection Regulation ((EU) 2016/679) (“GDPR”) please address your queries to the dataprivacymanager@lek.com.



2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the personal identifiers has been removed (anonymous data).

Automatic collection of information upon visiting L.E.K. Consulting's site

When you access our Website, L.E.K. Consulting will collect and store certain information, such as: the domain name and host from which you access the Internet, the browser software and operating system of your computer, the Internet protocol (IP) address of your computer, the pages accessed or visited on the site, the Internet address of the site from which you directly linked to L.E.K. Consulting's Website, as well as your browser's country setting. If you leave our Website via an external link to another site/domain name, we will not collect any information that you share on the external site/external domain name.

Collection of voluntary information by L.E.K. Consulting

By writing (including by way of email) to L.E.K. Consulting or by filling out certain forms or data requests from L.E.K. Consulting, or otherwise voluntarily requesting or supplying information to L.E.K. Consulting, you are volunteering to provide such information, including but not limited to, your contact information and/or site registrations, name and address, telephone number or fax number, to us. If you e-mail us, we will collect your e-mail address and IP addresses.

If you do not want to receive non business related e-mail communications from us in the future, please let us know by sending us an e-mail at info@lek.com. If you supply us with your postal address online you will only receive the information for which you provided us your address. Persons who supply us with their telephone numbers online will only receive telephone contact from us with information relating to their particular request.

We also collect, use, store and share **Aggregated Data** such as statistical or demographic data for our or third party use for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data as this data does not directly or indirectly reveal your identity. For example, we may aggregate your use of this Website data to calculate the percentage of users accessing a specific Website feature or particular content. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Notice or any other privacy notice we may have sent or provided you access to at the time or soon after its collection.

Other than in the context of our recruitment activities for monitoring and equality purposes, see our [Recruitment Notice](#), we do not collect any **Special Categories** of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, criminal convictions, criminal offenses, information about your health and genetic and biometric data, etc.).

3. HOW WE COLLECT INFORMATION AND USE COOKIES

Our Website uses “Cookies,” which are text files placed on your computer or mobile device when you visit the Website to store certain preferences and information. Your browser includes instructions to allow you to establish certain settings on your computer to warn you before a Cookie is stored, block all Cookies or erase Cookies from your hard drive, if you wish to do so. If you do decide to disable cookies, you may not be able to access some areas of our website. By continuing to use our Website without changing your settings, you consent to our use of cookies as described above.

Our Website uses both session cookies and persistent cookies. The use of cookies in these ways is to improve the functionality of our Website and your experience when using it. Session cookies enable you to move from page to page within our website and any information you enter to be remembered. A session cookie is deleted when you close your browser or after a short time. Persistent cookies allow our Website to remember your preferences and settings when you visit our Website in the future. Persistent cookies expire after a set period of time. Cookies are used in the following ways on our Website:

- **Contact Forms** - we use a session cookie in our contact forms to allow you to contact us via our Website.
- **Content Management System** - we use persistent cookies and session cookies in our content management system to enable the Website to work effectively and to remember your preferences and settings.
- **Google Analytics** - we use Google Analytics to provide us with information about how you use our Website. We use this information to compile statistics and to help us to improve our website and the services we offer. Google uses cookies as part of this process to collect anonymous information, including the number of visitors to the Website, where they have come to the Website from, the pages they visit and the length of time they have spent on the Website.
- **E-mail Subscriptions Service** - session cookies are used in our e-mail subscriptions service to track recipients' interaction with our e-mail updates and to facilitate our online subscriptions manager website.
- **LinkedIn** – session cookies are used to track basic demographic information of LinkedIn visitors to our website
- **Online Application System** - we use session cookies on our online application system to assist in the navigation around the site.
- **Video Content** - we use an online video software provider to host and play our video content. That provider uses session cookies to collect certain non-personally identifiable information about you when you view our videos, including your IP address, browser type, Internet Service Provider and operating system. They also collect information relating to how videos are played, including when and for long, and whether they are played in full screen mode. This information



helps them to monitor how their software is being used and us to monitor how our videos are being viewed.

- **Alumni Section** – we use persistent and session cookies to help you access the L.E.K. Alumni Network Website and to remember your preferences and settings. For further details about the processing of personal data in the context of the L.E.K. Alumni Network please contact us by emailing info@lek.com or see our [Marketing, Business Development and Alumni Privacy Notice](#).

You can learn more about cookies at www.allaboutcookies.org and www.youronlinechoices.eu.



4. HOW WE USE YOUR PERSONAL DATA

L.E.K. Consulting will only use your personal data when the laws of the jurisdiction of specific L.E.K. Consulting entity allow. Most commonly, we will use your personal data where L.E.K. Consulting has a legitimate interest in, or other legal basis for, processing your information, including where we need to comply with a legal or regulatory obligation or in relation to legal claims. We may also process your personal data where we have your consent to process your personal information and, when we rely on your consent for the processing, you may withdraw such consent at any time. Other lawful basis for us processing your data may be that such processing is necessary for the performance of a contract we have entered or at your request are entering with you. However, please note that where we have relied on more than one legal basis for processing, we may continue the processing without your consent.

The information we collect from you may be used to improve the content of our Website, to fulfill your requests for information, provide services and marketing information to you, recruit and evaluate job applicants and otherwise communicate with you, and to serve the appropriate region data to you. We may also keep your personal data and use it to contact you in the future.

Data submitted on the Website will be used for the purposes specified in the relevant part of the Website and, where relevant, for other purposes for which you give your consent.

You have the right to withdraw your consent where this has been provided, or to unsubscribe to mailings lists or registrations at any time by either using the unsubscribe link within our email communications or by writing to us at info@lek.com.



5. DISCLOSURES OF YOUR PERSONAL DATA AND INTERNATIONAL TRANSFERS

L.E.K. Consulting does not sell or license personal information to third parties. We may disclose the information collected with third-party marketing service companies which may process your data on our behalf and under our instruction. These third-party service providers include, dotMailer, HubSpot, LinkedIn, Grove Marketing, Google Analytics New Relic and AddThis, who assist us in maintaining our Website, analyzing our Website traffic, and in providing services and information to users of our Website. We require all third parties to respect the security of your personal data and to treat it in accordance with applicable law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

With respect to Ad Servers: we do not partner with or have special relationships with any ad server companies.

L.E.K. Consulting reserves the right to disclose your information where required by law or to comply with valid legal or regulatory processes to protect L.E.K. Consulting's rights.

In addition, we may also disclose your personal data to third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets, or alternatively, if we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners, or combined group, may use your personal data in the same way as set out in this Privacy Notice, otherwise you will be notified of any change by an updated privacy notice on this Website. With regard to personal data processed in connection with our recruitment activities and information on the use of personal data provided on our online application system, please see our online application system and [Recruitment Notice](#).

The information collected may also be shared within the L.E.K. Consulting Group companies on a global basis and globally with third parties who may be providing services to any L.E.K. Consulting company. Those countries may not provide an adequate level of protection in relation to the processing of personal data but, in connection with the processing of personal data to which GDPR applies where required by law, we have put in place legal mechanisms designed to ensure adequate data protection. Such mechanisms include the [EU Model Clauses](#) and the use of European Commission: [EU-US Privacy Shield](#) contracts. For transfers within L.E.K. Consulting Group of companies, we ensure each office complies with our internal policies on personal data.

By your use of this Website, you agree to the transfer and hosting of your personal information anywhere in the world within the L.E.K. Consulting Group.

Please [contact us](#) if you want further information on transferring your personal data.



6. LINKS TO THIRD-PARTY SITES

The lek.com website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.



7. SOCIAL NETWORKING

The lek.com Website may allow you to sign into and associate your social network accounts, with L.E.K. Consulting. This includes, but is not limited to, LinkedIn, Twitter, Facebook and YouTube. The Website may also allow you to log in to a L.E.K. Consulting account using your social network credentials. By doing this, you consent to us accessing the personal data that you have made publically available on the social media platform, which could include, but is not limited to, your email address, your profile name and picture and location. We will process this information in accordance with this Privacy Notice, but we are not responsible in any way for the terms of use of the social network, their privacy notice or how they process your data. To manage the information that is shared through your account with L.E.K. Consulting and other third party applications, or to disconnect a social media account from us, please refer to the privacy notice of your social network account.



8. DATA SECURITY

L.E.K. Consulting has put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. For the processing of data subject to GDPR, they will only process your personal data on our instructions and where they are subject to a duty of confidentiality, and we will also deal with personal data breaches and will notify you and any applicable regulator of a breach where we are legally required to do so. In the EU, the relevant authority is the UK's [Information Commissioner's Office \(ICO\)](#).

Despite these precautions, L.E.K. Consulting cannot guarantee the security of the information collected from third parties or transmitted through our Website or guarantee the security of emails. Therefore, we assume no liability for any disclosure of information collected arising from the acts of third parties or other events, acts or omissions outside of our control, including, but not limited to, interruption of service or any issues related to the use of the internet. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.



9. DATA RETENTION

L.E.K. Consulting will only retain your personal data for as long as necessary to fulfill the purposes we collected it for, including, where applicable, for the purposes of satisfying any legal, accounting or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means and the applicable legal requirements.

Details of retention periods applied to your personal data can be requested by [contacting us](#). For data subjects protected by GDPR we keep basic information about you for six years after you cease to use our services or hold other communication with us. This data retention schedule comes into effect January 2020, six years since the launch of our current contact database. Personal information collected in relation to money laundry requirements will be kept for up to 10 years. In some circumstances, you can ask us to delete your data: see request erasure below for further information.

We may anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.



10. L.E.K. CONSULTING RECRUITMENT PROGRAM

We collect and process your personal data in connection with our recruitment processes. Our [Recruitment Privacy Notice](#) gives full details of how L.E.K. Consulting protects your data in relation to our recruiting activities. You can apply for roles at L.E.K. Consulting through our third-party [recruitment portal](#) accessed via our website. When you first register with the portal, you will be asked to acknowledge that you have read the terms of our [Recruitment Privacy Notice](#) and also provide explicit consent to certain processing activities if this is required.



11. L.E.K. CONSULTING ALUMNI WEBSITE

If you are a user of the alumni section of our Website and you choose to provide your contact or other personal information in our searchable directory, other alumni and L.E.K. Consulting staff will also have access to that information and may use such information to contact you. If you are a data subject protected by GDPR, L.E.K. Consulting will only contact you in connection with the L.E.K. Alumni Network if we have your consent to do so or as we have otherwise stated in this Privacy Notice. You have the right to withdraw your consent at any time by emailing dataprivacymanager@lek.com.

As a user of the alumni section of our Website you also agree to the use of cookies to help you access the site and to remember your preferences and settings as outlined above.

12. YOUR LEGAL RIGHTS

Under local data protection laws, you may have rights in relation to your personal data. In the processing of your personal data, certain of your rights are protected by the GDPR, and these rights will include the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction** of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent



If you are protected by GDPR and wish to exercise any of the rights set out above, please [contact us](#). However, there are circumstances in which those rights may not be available to you and we may not satisfy your request.

You will not have to pay a fee to access your personal data or to exercise any of the other rights, where these rights apply in our processing of your personal data. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

In addition, where granted by local law, you may also have the right to make a complaint at any time to the relevant data protection authority. We would, however, appreciate the chance to deal with your concerns before you approach any authority so please contact us in the first instance.



13. YOUR CALIFORNIA PRIVACY RIGHTS

California Civil Code Section 1798.83 permits users of the Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an e-mail to info@lek.com or write us at

L.E.K. Consulting
Attn: Legal
75 State Street, 19th Floor
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