



Incremental Borrowing Rate Calculator (IBR) Privacy Notice

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This notice covers your use of this system and the limited processing of personal information that Deloitte Touche Tohmatsu Limited with registered office at 1 New Street Square, London, United Kingdom, EC4A 3HQ ("DTTL", "Deloitte Global") performs as a data controller. This notice does not apply where Deloitte Global processes your personal information as a processor. When used in this Privacy Notice, "we", "us" and "our" refers to Deloitte Global.

This system is intended for use by organizations such as entities of the [Deloitte Network](#). If such organization (e.g., a Deloitte Member Firm or a client of a Deloitte Member Firm) decided to grant you access to use this system or is involved in the provision of professional services, then Deloitte Global acts as a processor for all processing of your personal information through this system, other than the limited uses mentioned below. If you have questions about or wish to exercise your personal information protection rights in connection with the personal information processing by this system that are not covered by this privacy notice, please contact the organization that decided to grant you access to use this system or is involved in the provision of professional services or refer to its privacy notice.

Deloitte Global is committed to protecting your information by handling it responsibly and safeguarding it using appropriate technical, administrative, and physical security measures. Although we use appropriate security measures once we have received your personal information, the transmission of data over the internet (including by e-mail) is never completely secure. We endeavour to protect personal information, but we cannot guarantee the security of data transmitted to us or by us over the internet.

Personal information which we process as a controller through this system

When you access this system, Deloitte Global automatically collects information and online identifiers from your device such as IP address, device type, browser type, operating system, current URL, and access times. This information is collected using cookies and similar tracking technologies, as explained further in the Cookie Notice available [here](#).

How we use information about you

Your personal information collected by this system as mentioned above will be used for the following purposes: (i) to enhance your user experience by remembering your choices and preferences; (ii) to capture internal metrics related to Deloitte Network and usage of the system by entities of the Deloitte Network; (iii) to analyze and understand overall system traffic information; and (iv) to make improvements to the system.

Disclosure of personal information to third parties

For one or more of the purposes outlined in the paragraph above, we may transfer personal information to other members of the Deloitte Network and/or third parties that provide services to us and/or the Deloitte Network.

Please note that some of the recipients of your personal information referenced above may be based in countries outside of the UK or the European Economic Area ("EEA") whose laws may not provide the same level of data protection. In such cases, we will ensure that there are adequate safeguards in place to protect your personal information that comply with our legal obligations. The adequate safeguard might be a data transfer agreement with the recipient based on standard contractual clauses approved by the applicable authority (e.g., for personal information subject to the UK GDPR, the UK Information Commissioner's Office) for transfers of personal information to third countries.

Further details of the transfers described above, and the adequate safeguards used by us in respect of such transfers are also available from us. For such information, please contact us by using the "Contact information" section below.

The lawful basis for processing information as a Controller

We use your personal information for the purposes outlined above because of: (a) our legitimate interests in the effective delivery and improvement of the system; (b) our legitimate interests in the effective and lawful operation of the system; and (c) our legitimate interests in measuring content usage and understanding system performance impacts; so long as such interests are not outweighed by your interests.

Information retention

We will hold your personal information on our systems for as long as is necessary for the relevant activity or services.

Your rights

Under your local law, you may have various rights in relation to your personal information. In particular, you may have a right to:

- obtain confirmation that we are processing your personal information and request a copy of the personal information we hold about you;
- ask that we update the personal information we hold about you, or ask that we correct such Personal Information that you think is incorrect or incomplete;
- ask that we delete personal information that we hold about you, or restrict the way in which we use such personal information;
- object to our processing of your personal information;
- obtain a copy of the personal information protection clauses governing data transfers in circumstances where we transfer personal information referenced above to countries that do not offer adequate personal information protection under applicable law; and
- if you are unsatisfied with the way in which we have handled your Personal Information or any privacy query or request that you have raised to us, you have a right to complain to the UK Commissioner.

If you are located in the EEA and are unsatisfied with the way in which we have handled your personal information or any privacy query or request that you have raised to us, you have a right to complain to the Data Protection Authority ("DPA") in your jurisdiction. For such information, please contact us by using the "Contact information" section below.

Contact information

To exercise your rights or if you have any questions concerning your privacy in connection with our processing of your personal information as a controller, please contact DTTLPrivacy@deloitte.com.

DGSL Privacy Services Limited, with registered office at 29 Earlsfort Terrace, Dublin 2, Ireland, is appointed as our representative in the European Union to act on our behalf if, and when, we undertake data processing activities to which the EU General Data Protection Regulation (GDPR) applies. It can be contacted at DTTLPrivacyEU@deloitte.com.

Should you wish to contact our Data Protection Officer, you may write to 1 New Street Square, London, EC4A 3HQ, or send an email to DeloitteGlobalDPO@deloitte.com.